

September 21, 2026

Via Email

Alejandra Zambrano, Interim City Clerk

Honorable Mayor Claire Gunselman and Members of the City Council

Mayor Claire Gunselman

Vice Mayor Julia Sierk

Councilmember Susan Feist

Councilmember Dan Riordan

Councilmember Jim Swift

City of Sutter Creek

18 Main Street

Sutter Creek, CA 95685

**Re: Submission of Independent Traffic Engineering Report for the Administrative Record
— Proposed Cannabis Retail Facility at 11 Ridge Road (APN 044-020-063); City Council
Meeting of September 21, 2026, Consent Calendar Item No. 7.A**

Dear Ms. Zambrano, Mayor Gunselman, and Councilmembers:

On behalf of Sutter Creek Responsible and Compliant Retail LLC (“Applicant”), I write to submit the enclosed independent traffic engineering report, dated September 20, 2026, prepared by Dr. Antonio S. Coco, P.E., of Coco Traffic Planners, Inc., entitled “11 Ridge Road Dispensary Traffic Analysis – Sutter Creek, California” (the “Report”), for inclusion in the administrative record in connection with the Council’s second reading and adoption on September 21, 2026 of the ordinances approving the Development Agreement and amending the Zoning Code for the above-referenced project.

Please distribute to all City Council members and ensure that all have access to our letter and report in advance of the hearing and that it is part of the record.

By way of background, on August 17, 2026 just hours before the Council’s August 17 hearing, Amador County submitted a memorandum prepared by DKS Associates (the “DKS Memorandum”) challenging the City’s transportation analysis. Because of the timing of that submission, no professional engineering response could be prepared before the Council acted. The Council nonetheless properly proceeded on August 17. Its determination was supported by the staff report’s transportation and vehicle-miles-traveled analysis, the ITE trip-generation data in the record, and Applicant’s written response identifying the methodological defects in the DKS Memorandum.

The enclosed Report is the first professional engineering analysis prepared with adequate time to evaluate the DKS Memorandum in full. It confirms the City’s transportation findings and its CEQA determination, concluding: “The analysis conducted shows that the proposed 11 Ridge

Road Dispensary will not increase area traffic volumes by 200 or more daily vehicle trips therefore, no further analysis is required.” Applying the ITE Trip Generation Manual, 11th Edition, the most recent edition providing the complete set of daily and peak-hour factors for both a walk-in bank and a cannabis dispensary, and deliberately conservative assumptions (no pass-by or transit reductions, and treating the former bank’s morning peak as zero), the Report calculates a net increase of approximately 145 daily vehicle trips over the former bank use. Most importantly, the Report reaches that conclusion while using the gross floor area of the entire building (2,662 square feet), the very floor-area assumption on which the DKS Memorandum rested, rather than the 1,300 square feet of customer-accessible retail area used in the City’s screening analysis. Under either floor-area approach, the net increase falls well below the 200-trip threshold. The DKS Memorandum’s higher figure derives not from its floor-area assumption but from substituting a higher-generating drive-in bank baseline for the actual former walk-in bank use and applying no reduction factors. The City’s determination is therefore correct under either methodology.

The Report further notes that the Project’s increase in vehicle trips “will not be perceptible to area drivers therefore, no measurable impact will be possible in area vicinity intersections’ queues as a result of the proposed dispensary.” As to safety, the Report concludes that the conditions identified in the DKS Memorandum are “existing conditions” along the Ridge Road corridor, and that “the proposed project would not create or materially worsen a transportation safety condition, and the DKS memorandum does not provide a traffic engineering basis for concluding otherwise.”

The Report also confirms the City’s VMT findings: “by creating a location in town where customers can travel shorter distances than currently available, the proposed cannabis dispensary will certainly reduce the area VMT. This is consistent with the City’s analysis regarding the net VMT methodology, which correctly stated that the project will reduce the area VMT.”

The Report was prepared by a licensed professional engineer applying the ITE Trip Generation Manual and the Governor’s Office of Planning and Research technical guidance, and it constitutes substantial evidence upon which the Council may rely. It is offered as additional professional confirmation of a determination the record already supports, not as a substitute for it. The Report’s engineering conclusions support the City’s CEQA determinations under both the Class 1 (Existing Facilities) exemption (CEQA Guidelines § 15301) and the common-sense exemption (§ 15061(b)(3)) by confirming the absence of any significant transportation impact.

Applicant respectfully requests that the Council: (a) receive the Report into the administrative record for the September 21, 2026 action; (b) consider it in connection with the second reading and adoption of the Development Agreement ordinance — including the CEQA determinations set forth in the Agreement’s recitals — and the Zoning Code amendment; and (c) to the extent the Council deems appropriate, confirm on the record that its CEQA determinations are supported by, and consistent with, the Report’s analysis.

Thank you for your attention to this submission. Please contact the undersigned with any questions regarding the Report or its transmission to the Council.

Respectfully submitted,



Eric Lightman, Esq.

General Counsel

Sutter Creek Responsible and Compliant Retail LLC

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Enclosure: 11 Ridge Road Dispensary Traffic Analysis – Sutter Creek, California, Coco Traffic Planners, Inc. (Dr. Antonio S. Coco, P.E.), dated September 20, 2026

cc: Tom DuBois, City Manager (tdubois@cityofsuttercreek.org)

Derek Cole, City Attorney (dcole@colehuber.com)

Seena M. Samimi, Esq., Meyers Nave (ssamimi@meyersnave.com)

Erin Ventura, Planning Consultant, Hauge Brueck Associates (eventura@haugebrueck.com)

Josh Lewis, Embarc (jlewis@goembarc.com)



Dr. Antonio S. Coco, P.E.

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September 20, 2026

Mr. Seena Max Samimi, Attorney at Law
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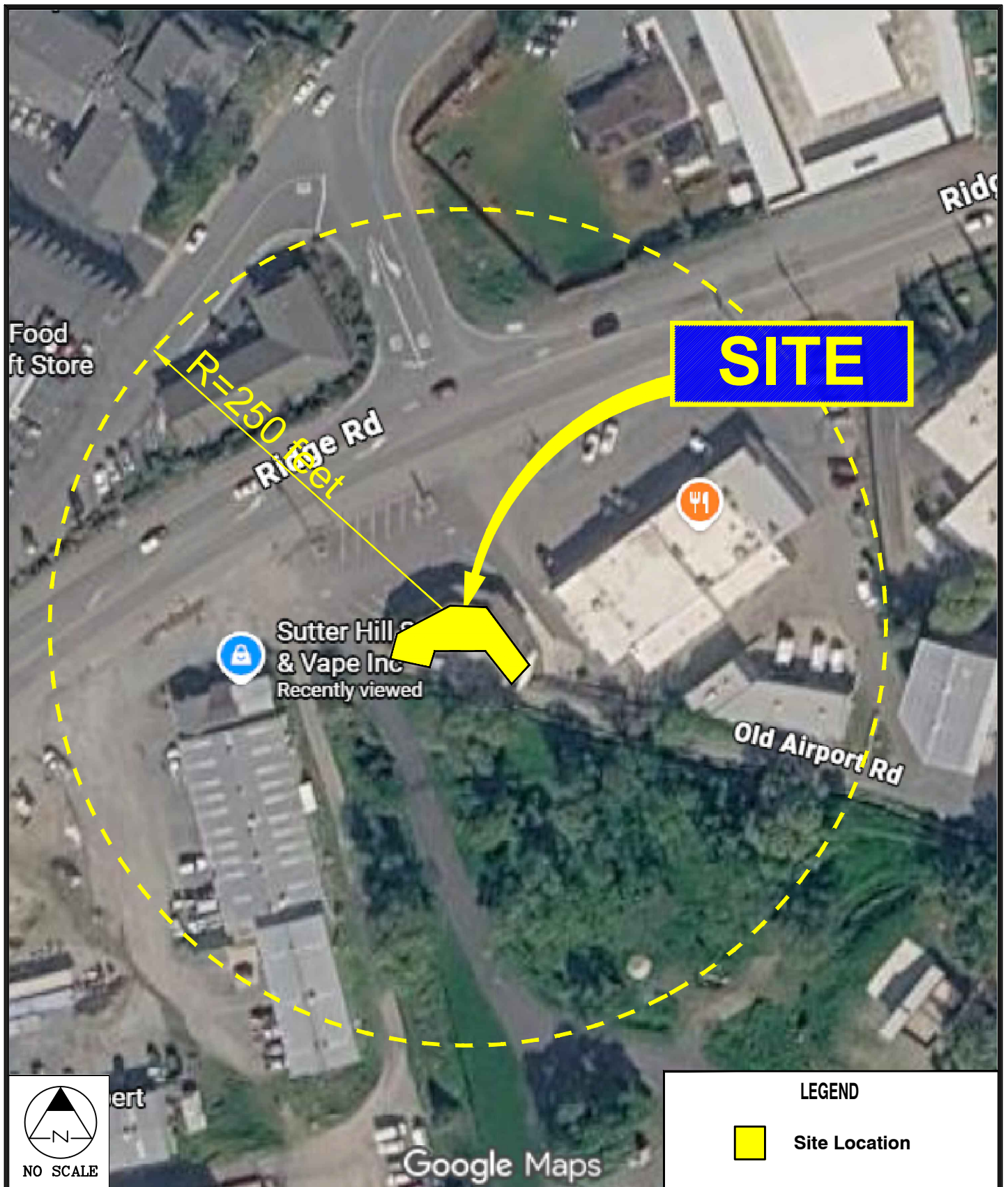
Subject: **11 RIDGE ROAD DISPENSARY TRAFFIC ANALYSIS - SUTTER CREEK, CALIFORNIA**

Dear Mr. Samimi,

Our firm has been retained to provide traffic engineering services associated with the proposed Cannabis Dispensary (Project) located at 11 Ridge Road, in the City of Sutter Creek, California. For the purpose of this analysis we have reviewed the following documents: **1)** 11 Ridge Initial Site Review, prepared by DKS Associates on August 14, 2026; **2)** Embarc Consolidated Response to City Council, prepared by Meyers Nave on August 14, 2026; **3)** Supplemental Response — August 14, 2026 DKS Associates Memorandum, prepared by Embarc on August 17, 2026; and **4)** Report to the City of Sutter Creek Planning Commission, prepared by Erin Ventura, Planning Consultant, and Tom Dubois, City Manager, on July 8, 2026.

The lot has a C2 (Commercial Zoning) explicitly designed to provide office, retail, and convenient services and products to residents. Figure 1 shows the location of the subject site on a local basis. The Project consists of locating the dispensary in an existing 2,662 square feet (SF) building, on a 10,860 SF parcel of land. The building was occupied by a walk-in bank. It should be noted that the bank has been closed for the last seven years. The Project will be supported by a 17 stall surface parking facility. Access to the parking area is provided by two 2-way driveways off Ridge Road.

The purpose of this analysis is to determine the traffic volumes generated by the Project during peak days of the week, versus those generate by the previous Walk-in Bank, and determine whether the Project will add 200 or more daily vehicles to the surrounding area street system, which would require an in depth traffic study for the Project.



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 TRAFFIC AND TRANSPORTATION ENGINEERING AND CONSULTING
 10835 SANTA MONICA BLVD., STE 202, LOS ANGELES CA 90025

SITE LOCATION MAP

Studies by the Institute of Transportation Engineers (ITE), Caltrans, ourselves and others have identified generalized factors which relate traffic characteristics with quantity and type of development. These traffic generation factors are useful in estimating the total future characteristics of a project yet to be constructed and occupied. Judgment is required on the part of the analyst to select the appropriate factors which best match the type of developments contemplated.

The quantity of floor area, the density of the development, the availability of public transportation, and the regional location of the project all affect the traffic generation rate. While there are many different types of uses and many parameters upon which to estimate traffic (acreage, floor area square footage, employment, etc.) the best factors for a walk-in bank, and a dispensary provided by the ITE Manual relate to the gross floor area (GFA) of the development, 2,662 SF.

In order to evaluate the quantity of traffic generated by the site, ITE traffic generation factors from the 11th Edition of the Traffic Generation Manual were applied to the proposed project's land uses, for the daily and the morning and evening peak periods. The AM and PM peak hours relate to a one-hour period within the 7:00 to 9:00 AM and the 4:00 to 6:00 PM peak periods respectively. It should be noted that while the latest edition of the ITE Manual is the 12th, it provides only PM peak hour traffic generation factors for Walk-in Banks, while the 11th Edition provides the full set of factors both for the daily and the PM peak hour. Consequently, since the analysis is based upon the daily traffic impact, it is more accurate and appropriate to use data provided by the 11th Edition, which provides Daily, AM and PM peak hour traffic generation factors for Dispensaries, and Daily and PM peak hour traffic for Walk-in Banks. Consequently, the DKS Associates' use of the Drive-in Bank ITE traffic generation factors to evaluate the traffic associated with the previous site project is incorrect, and inconsistent with commonly accepted traffic generation calculations.

Table 1 shows in detail the generation factors used for analysis purposes along with the related volumes, for the above mentioned conditions. The traffic generation factors used show that the proposed project will generate a total of about **562** vehicle trips per day (281 inbound and 281 outbound). Similarly, during the AM commuter peak hour, the Project will generate a total of **28** vehicle trips (15 inbound and 13 outbound). The PM commuter peak hour traffic generation was estimated at **50** vehicle trips (25 inbound and 25 outbound). These volumes do not include any Transit Credit, or pass-by trips reduction factors.



TABLE 1

TRAFFIC GENERATION
11 Ridge Road Dispensary Traffic Analysis - Sutter Creek

L A N D U S E	SIZE	UNIT	LAND USE CODE	AVERAGE DAILY TRAFFIC		AM PEAK HOUR				PM PEAK HOUR				
				Trip Ends (TE) Rate (1) TE (2)		TE Rate (1) In Out		Trip Ends (2) In Out		TE Rate (1) In Out		Trip Ends (2) In Out		
Site Proposed Project														
Cannabis Dispensary (DKS Study)	2.662	KGFA	882	227.76	606	N/A	N/A	N/A	N/A	6.065	6.065	16	16	
Cannabis Dispensary (11th)	2.662	KGFA	882	211.12	562	5.481	5.059	15	13	9.460	9.460	25	25	
Correct Site Traffic Generation					562	AM Peak = 28			15	13	PM Peak = 50		25	25
Site Existing Development														
Walk-In Bank (DKS)	2.662	KGFA	911	N/A	N/A	N/A	N/A	N/A	N/A	5.340	6.790	14	18	
Walk-In Bank (11th Edition)	2.662	KGFA	911	156.48	417	N/A	N/A	N/A	N/A	5.337	6.793	14	18	
Previous Development Net Vehicular Site Traffic Generation					417	AM Peak = 0			0	0	PM Peak = 32		14	18
Proposed Project Total Future Net Vehicular Traffic Impact					145	AM Total = 28			15	13	PM Total = 18		11	7

Note: Traffic Generation factors per Institute of Transportation Engineers (ITE) Traffic Generation Manual 11th Edition.

1) TE Rate is the average number of Trip Ends generated per "SIZE" Unit (i.e. DU).

2) Trip End is a one-way vehicle movement entering or leaving the traffic generator.

Table 1 also shows in detail the traffic generation factors and related volumes for the above mentioned conditions, as used for analysis purposes. The previous Walk-in Bank was estimated to generate a total of about **417** vehicle trips per day (208 inbound and 209 outbound). Similarly, during the PM commuter peak hour, the Walk-in Bank was estimated to generate **32** vehicle trips (14 inbound and 18 outbound).

As indicated in Table 1, the Project's net traffic impact will determine a net increase of 145 daily vehicle trips (72 inbound and 73 outbound). Similarly, during the AM commuter peak hour, the Project will generate a total of **28** vehicle trips (15 inbound and 13 outbound). The PM commuter peak hour traffic generation increase was estimated at **18** vehicle trips (11 inbound and 7 outbound). These volumes do not include any Transit Credit, or pass-by trips reduction factors. The analysis conducted shows that the proposed 11 Ridge Road Dispensary will not increase area traffic volumes by 200 or more daily vehicle trips therefore, no further analysis is required.

The DKS memorandum identifies existing conditions along the Ridge Road corridor, including roadway geometry, access-management issues, vehicle queues, collision history, and limited pedestrian and bicycle facilities. However, the memorandum does not provide or evaluates in any way how the proposed project would cause or materially worsen those conditions, quantify any project-related increase in collision frequency or severity, or identify any new design feature that would create a safety hazard. It should be noted that the maximum increase in traffic associated with the Project is 15 inbound trips during the PM peak hours. This translates into about one vehicle trip every four minutes (to be further split among different directions). This increase will not be perceptible to area drivers therefore, no measurable impact will be possible in area vicinity intersections' queues as a result of the proposed dispensary. Accordingly, in my professional opinion, the proposed project would not create or materially worsen a transportation safety condition, and the DKS memorandum does not provide a traffic engineering basis for concluding otherwise.

The above findings that the Project's traffic impact is less than significant is consistent with the California Governor's Office of Planning and Research (OPR) VMT recommendations which indicate that a retail project may be presumed to have a less than significant VMT impact if the retail use is under 50,000 SF in size. This is due to the fact that the traveled miles are reduced by the availability of a given service at a shorter distance from the customers place of work or residence. In particular, residents of the City of Sutter Creek, who currently have to drive a reported 22 to 32 miles to other cities to find the closest existing dispensaries, will have a local option for cannabis



dispensary purchases. Therefore, by creating a location in town where customers can travel shorter distances than currently available, the proposed cannabis dispensary will certainly reduce the area VMT. This is consistent with the City's analysis regarding the net VMT methodology, which correctly stated that the project will reduce the area VMT.

* * * * *

Please call me if you have any questions with regard to our analysis. It has been a pleasure to serve you on this most interesting project.

Very truly yours,
COCO TRAFFIC PLANNERS, INC.



Dr. Antonio S. Coco, P.E.
President

ASC/mp
#2k26015AX



