

City of Fairfield Planning Commission

RESOLUTION NO. 2020-15

**RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF FAIRFIELD
RECOMMENDING THAT THE CITY COUNCIL ADOPT THE CITY OF FAIRFIELD
SENATE BILL 743 IMPLEMENTATION PROCEDURES AND THE THRESHOLDS OF
SIGNIFICANCE AND MITIGATION MEASURES FOR VEHICLE MILES TRAVELED
(VMT) AS REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT
(CEQA) GUIDELINES IMPLEMENTING SB743, TO ADDRESS ENVIRONMENTAL
REVIEW OF TRANSPORTATION IMPACTS UNDER CEQA**

THE PLANNING COMMISSION OF THE CITY OF FAIRFIELD HEREBY RECITES,
FINDS, DETERMINES, ORDERS, AND RESOLVES AS FOLLOWS:

Section 1. Procedural Findings.

A. The California Environmental Quality Act Guidelines (CEQA Guidelines) encourage public agencies to develop and publish generally applicable “thresholds of significance” to be used in determining the significance of a project’s environmental effects. CEQA Guidelines Section 15064.7(a) defines a threshold of significance as “an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to less than significant.”

B. CEQA Guidelines Section 15064.7(b) requires that thresholds of significance must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence. Pursuant to CEQA Guidelines Section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies provided that the decision of the agency is supported by substantial evidence.

C. Senate Bill (SB) 743, enacted in 2013 and codified in Public Resources Code Section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects. In 2018, the Governor’s Office of Planning and Research (OPR) proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines Section 15064.3 that identifies vehicle miles traveled (VMT) – meaning the amount and distance of automobile travel attributable to a project per land use unit per day – as the most appropriate metric to evaluate a project’s transportation impacts. As a result, automobile delay, as measured by Level of Service (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. CEQA Guidelines Section 15064.3 went into effect on July 1, 2020.

D. The City of Fairfield retained DKS Associates (Consultant) to develop a strategy for local environmental review of transportation impacts using Vehicle Miles Traveled (VMT), the new metric.

E. Staff and the Consultant team in response to the State guidelines, have developed a *City of Fairfield Senate Bill 743 Implementation Procedures* which contains a goal of 15% reduction below current VMT levels and identifies thresholds of significance and screening criteria for new development projects. The screening criteria include project location, size, and land use.

F. Staff and the Consultant team, using State guidelines, have also developed mitigation options for projects which cannot be determined to have less than significant impacts on the environment and screened from further VMT analysis using the screening criteria.

G. The Planning Commission has held a duly noticed public hearing on September 23, 2020. City staff and the Consultant team presented substantial factual information regarding the proposed standards and criteria in staff reports and through oral presentations before the Commission, and the Planning Commission considered all public testimony and information presented during the public hearing regarding this program.

Section 2. Based on the information presented by staff, the Planning Commission has determined that the proposed action, which is consistent with SB 743, is exempt from CEQA review under CEQA Guidelines Section 15308, as an action involving procedures for the protection of the environment.

Section 3. The Planning Commission hereby finds the thresholds of significance and mitigation measures identified in the *City of Fairfield Senate Bill 743 Implementation Procedures*, as attached hereto as Exhibit A, have been developed through a public review process and are supported by substantial evidence, as required by CEQA Guidelines Section 15064.7.

Section 4. The Planning Commission hereby recommends the City Council adopt the *City of Fairfield Senate Bill 743 Implementation Procedures* and the thresholds of significance and mitigation measures contained therein, as attached hereto as Exhibit A.

Section 5. The record of proceedings shall be located at the City's Community Development Department and the Director of Community Development shall be the custodian of such documents.

PASSED AND ADOPTED this 23rd day of September, 2020.

AYES: COMMISSIONERS: Jerome CHILDS / ~~Michael COAN~~ / Melissa CRUZEN / Lerecia EVANS / Chris MATTHEWS (Vice) / William WESLEY / Charles WOOD (Chair)

NOES: COMMISSIONERS: None

ABSTAIN: COMMISSIONERS: NONE

ABSENT: COMMISSIONERS: Coan

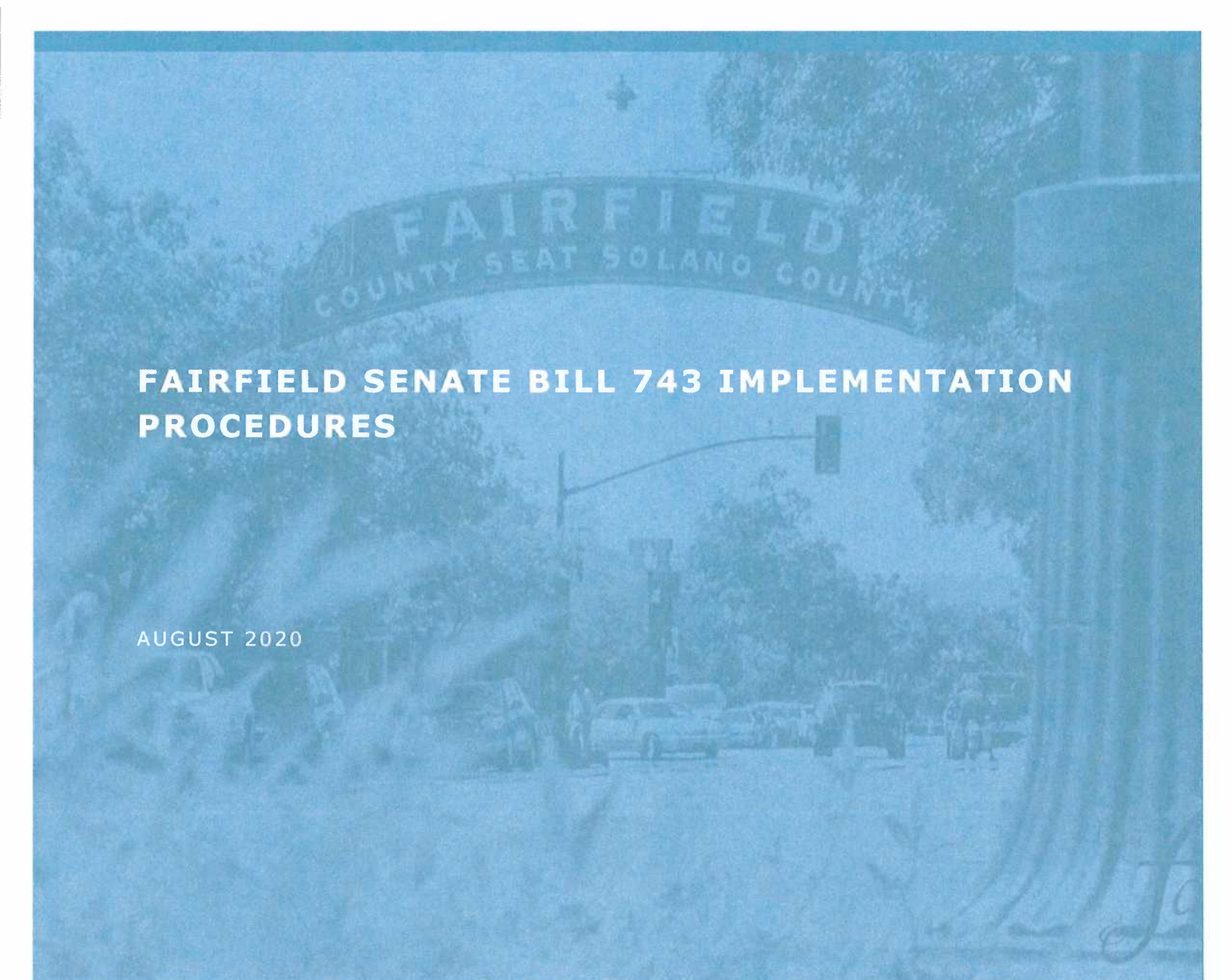


CHARLES WOOD, Chairperson

ATTEST:



DAVID FEINSTEIN, Secretary



FAIRFIELD SENATE BILL 743 IMPLEMENTATION PROCEDURES

AUGUST 2020

PREPARED FOR:

CITY OF FAIRFIELD



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- C. TRAVEL MODEL REFINEMENTS (TECH MEMO #3)
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BACKGROUND AND INTRODUCTION

In accordance with Senate Bill 743 (SB 743) and the resulting changes to the CEQA Guidelines published by the Natural Resources Agency, local agencies may no longer use measures of vehicle delay such as Level of Service (LOS) to quantify transportation impacts on the environment. While agencies may continue to maintain LOS standards and similar measures as a matter of local policy and for project analysis, Vehicle Miles Traveled (VMT) has been codified in the CEQA Guidelines as the most appropriate measure for measuring transportation impacts under the California Environmental Quality Act. This change applies statewide as of July 1, 2020.

The change from LOS to VMT for CEQA purposes requires revision of the City's Transportation Impact Report guidelines, which should address VMT thresholds of significance, screening, and mitigation procedures. This report summarizes previously provided technical material on recommended thresholds of significance and mitigation strategies. Proposed screening and analysis procedures as well as integration into the City's Transportation Impact Report guidelines are also discussed.

The recommendations on VMT thresholds and mitigation strategies in this report draw heavily on technical guidance published by the Governor's Office of Planning and Research (OPR) and an evaluation of greenhouse gas and VMT mitigation strategies from the California Air Pollution Control Officers Association (CAPCOA). These documents are listed in the References section. Standards of practice will evolve as jurisdictions use the revised CEQA guidelines and it is expected that the City of Fairfield will refine its procedures over time.

OVERVIEW AND REPORT ORGANIZATION

Evaluation of projects for potential VMT impacts will take place in parallel with the City's existing transportation analysis procedures.

Section 1 summarizes the recommended thresholds of significance for VMT and approaches to VMT analysis for several types of projects.

Section 2 describes screening of land use projects for VMT impacts. Projects that meet at least one of the screening criteria would not need to perform a formal VMT analysis. Among other screening options, residential and office projects located in low VMT generating areas may be presumed to have less than significant impacts. Rates of VMT per land use unit across different parts of the City have been calculated and can be compared to the recommended thresholds of significance, which are discussed in Section 1.

Section 3 covers VMT mitigation strategies for those projects that have been analyzed and found to have VMT impacts. Methods for assessing the effectiveness of mitigation strategies are also addressed in this section.

SECTION 1. APPROACH TO VMT ANALYSIS AND THRESHOLDS OF SIGNIFICANCE

Projects that are not screened out (see Section 2) will require a formal VMT analysis. Projects that are not screened or those that would significantly alter existing or planned land uses will require project specific VMT calculations. These projects can be analyzed by incorporating the project land uses into the Fairfield travel demand model and running a project scenario. Scripts and a VMT analysis spreadsheet have been developed to aid in this process. Alternatively, and with approval from the City, projects can be assessed with a stand-alone analysis (e.g. VMT based on the market area of a retail establishment) or use other available tools such as the Napa-Solano Activity Based Model.

RESIDENTIAL AND OFFICE PROJECTS

Table 1 summarizes VMT thresholds calculated as described in Tech Memo #4 – Baseline VMT calculations. ***The proposed thresholds are 85 percent of the existing baseline VMT per land use unit, as calculated over the Fairfield model area for office and residential uses.*** These recommendations are consistent with OPR guidance. Projects expected to daily generate VMT per unit under the applicable threshold could be presumed to have a less than significant transportation impact for CEQA purposes. Projects expected to generate VMT over the applicable threshold of significance would have to show how VMT could be mitigated to avoid a finding of impact.

For example, a single-family residential development expected to generate 50 VMT per unit could be presumed to have a less than significant impact and no further analysis would be necessary. A single-family residential project expected to generate 70 VMT per unit would need to reduce VMT per unit by 8.2 VMT per unit (12% or $8.2/70$). Similarly, a multifamily residential project generating 40 VMT per unit could be presumed to have a less than significant impact while one generating 50 VMT per unit would have to propose 5.9 VMT (12%) per unit in mitigations to avoid an impact. Office projects would be compared to the applicable threshold of significance (54.3 VMT per 1000 square feet) in a similar manner.

Note that for residential and office uses, the thresholds of significance are given in terms of VMT rates and the effectiveness of mitigation measures will be given in terms of percent decrease. More information on the estimation of VMT rates and mitigation measures may be found in the final section of this memorandum.

TABLE 1: RECOMMENDED VMT THRESHOLDS OF SIGNIFICANCE

(RECOMMENDED THRESHOLDS IN BOLD)

LAND USE (UNIT)	AVERAGE VMT PER LAND USE UNIT ^a	85% AVG. VMT/UNIT	85% AVG. VMT/CAPITA OR EMPLOYEE ^b
SINGLE FAMILY RESIDENTIAL (SFDU)	72.7	61.8	22.2
MULTIFAMILY RESIDENTIAL (MFDU)	51.9	44.1	18.9
OFFICE (1000 SQUARE FEET)	63.9	54.3	17.7

Notes: a) The VMT rates shown account for VMT that occurs outside the Fairfield area, where are applicable.

b) Conversion from VMT per land use unit as calculated from model output to VMT/capita or VMT/employee is shown for reference and comparison purposes. Occupancy factors are derived from the American Community Survey 2012-2016 Five-Year Estimates. Office employment assumes 325 square feet per employee.

OTHER LAND USE PROJECT TYPES

Retail - The recommended threshold for retail projects is any increase in total VMT that occurs as a result of the project (i.e. any increase in VMT that occurs anywhere as a result of the project). The OPR technical advisory gives 50,000 square feet for an individual retail establishment as a general guideline to distinguishing local from regional serving retail. Projects consisting of multiple spaces totaling more than 50,000 square feet might also be considered local serving retail if no single establishment is larger. For example, neighborhood centers¹ -convenience oriented centers of up to 125,000 square feet leasable area and typically anchored by a supermarket -could be considered local-serving.

Medical – While calculation of baseline VMT rates for medical land uses is possible using the model outputs, we recommend that medical projects be analyzed in terms of net VMT impacts in a manner similar to retail projects. As with retail, providing additional opportunities for healthcare may reduce the lengths of trips made for this purpose. By this line of reasoning, most freestanding clinics, medical practices, and nursing homes could be assumed less than significant with respect to VMT impacts. Larger or regional-serving facilities such as hospitals would likely require an environmental document that considers employee and patient VMT separately.

Industrial – The CEQA guidelines specify that the VMT to be considered when analyzing transportation impacts is passenger vehicle VMT. Truck trips, often the predominant type at industrial facilities, would not come into play as a transportation impact (although they would be considered under noise or air quality). While baseline VMT rates can be developed for industrial

¹ International Council of Shopping Centers, U.S Shopping Center Classification and Characteristics. (January 2017), https://www.icsc.com/uploads/research/general/US_CENTER_CLASSIFICATION.pdf.

land uses using the Fairfield travel demand model, the model does not distinguish between heavy and light duty vehicle traffic and a threshold of significance set using the model is likely to be unnecessarily restrictive. Instead, industrial land uses can be analyzed on a case-by-case basis to determine the net light-duty VMT impacts of proposed projects. If employee travel is the predominant source of light duty trips at a facility, this component might be assessed against the equivalent VMT per employee threshold for office land uses.

Mixed Use Projects - For mixed use projects, OPR recommends either analyzing each component of the proposed project separately or focusing on the predominant land use. For example, a multifamily residential project with some convenience retail might focus on the VMT impacts of the residential use, especially since the retail component could potentially be presumed less than significant if small enough.

Redevelopment Projects –Analysis of redevelopment projects should consider the VMT of the previously existing use to account for the net impact.

TRANSPORTATION INFRASTRUCTURE PROJECTS

This section discusses the approach to estimating VMT impacts of transportation infrastructure projects. Addition of through lanes or new roadways may induce vehicular travel and thus have a potentially significant VMT impact. The recommended approach for estimating the VMT impacts of such projects is to assess the net change over the area that the new or expanded facility is expected to influence. This calculation may be done with a travel demand model or applying an elasticity of demand as described in the OPR guidelines.

Note that new local roadways built primarily to provide access to individual properties would not need to be analyzed separately as their VMT impact is accounted for in the analysis of the new land use. Also note that there are a wide variety of infrastructure projects that are not expected to induce VMT per OPR guidance. Transportation infrastructure projects that are presumed not to have a significant VMT impact include:

- Maintenance and rehabilitation projects
- Reduction in the number of through lanes (i.e. road diets)
- Addition of capacity on local or collector streets in conjunction with pedestrian, bicycle or transit improvements
- Traffic signal retiming
- Installation of roundabouts or traffic circles
- Facilities for non-motorized travel (bike paths or trails)

Caltrans has published documents related to SB 743 implementation as it applies to state highway system. These include the draft Caltrans Transportation Impact Study Guidelines (Draft TISG, February 28, 2020), the draft Caltrans Transportation Analysis Under CEQA (TAC) and the draft Caltrans Transportation Analysis Framework (TAF).

SECTION 2. SCREENING PROCEDURES AND THE TIR GUIDELINES

Screening procedures will play an important part in streamlining project analysis. First, projects may be presumed to have less than significant VMT impacts due to size, proximity to high quality transit, and housing affordability. Second, projects may be screened according to location (see Figures 1-3). Projects located in areas that have been shown to generate VMT below the selected threshold of significance may be presumed to have less than significant impacts and no further analysis or mitigation would be required.

The City will likely want to retain its existing LOS standards for the time being for consistency with the current General Plan. Therefore, projects may be screened from requiring VMT analysis for CEQA purposes but still require analysis of LOS, safety, access, site circulation, and other topics to meet local requirements. These analyses, which will occur in parallel or in addition to CEQA VMT analysis, can continue to inform conditions of project approval by the City. The flowchart shown as **Figure 1** illustrates how the screening process would work in conjunction with local transportation analysis required by the City.

Currently, the City's Transportation Impact Report Guidelines require only a trip generation memo for smaller projects, defined as those with fewer than 100 peak hour project trips for non-residential uses or 50 peak hour trips for residential uses. Projects generating 50 or 100 peak hour trips or more will continue to require additional local transportation analysis topics to be addressed, including trip distribution, assignment, LOS, and sight distance. **Table 2** shows the project size for typical land uses that would fall under the local transportation analysis thresholds.

Once a project's local transportation analysis requirements are determined, VMT analysis requirements can be determined, following the process shown in the flowchart. The VMT screening criteria are further described below.

SCREENING CRITERION: SMALL OR INFILL PROJECTS

OPR advises that **projects generating fewer than 110 trips per day** could be presumed to have less than significant VMT impacts. **Table 3** shows the maximum project size that would correspond to this threshold based on average ITE trip generation rates for selected land uses. This criterion could be applied in conjunction with the City's current guidelines that require only a trip generation memorandum for smaller projects.

SCREENING CRITERION: LOW INCOME HOUSING

OPR advises that residential **projects consisting of 100 percent affordable housing units** may be presumed to have less than significant VMT impacts. The City may wish to specify additional criteria such as proximity to high quality transit or location within a priority development area for application of this screening option.

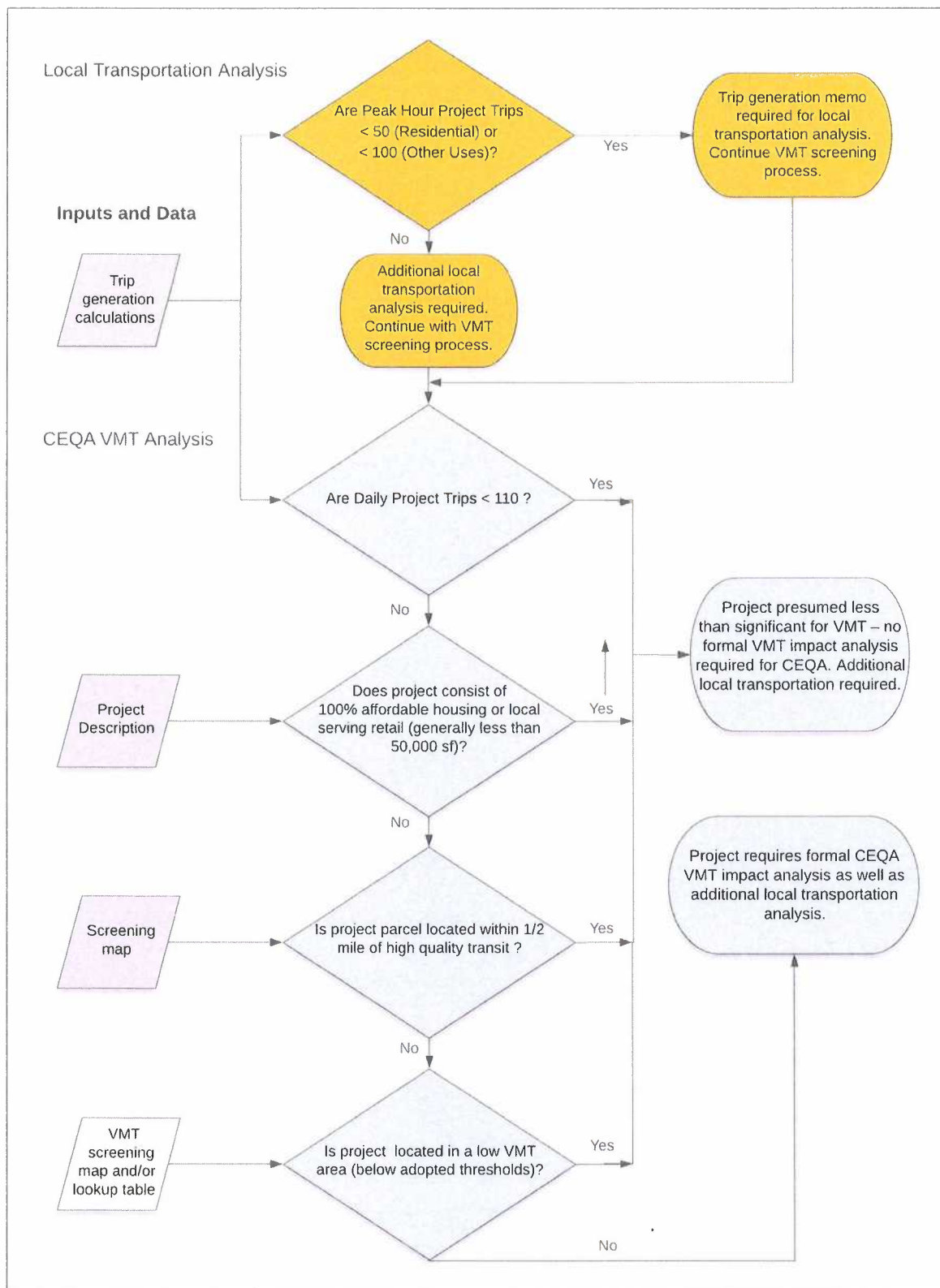


FIGURE 1. SCREENING PROCESS FOR TRANSPORTATION IMPACTS

TABLE 2: PROJECT SIZE THRESHOLDS FOR LOCAL TRANSPORTATION ANALYSIS SCREENING
(PROJECTS GENERATING NO MORE THAN 50 PEAK HOUR TRIPS)

LAND USE	ITE CODE	SIZE THRESHOLD	AM PEAK HOUR TRIPS	PM PEAK HOUR TRIPS
SINGLE FAMILY RESIDENTIAL	210	50 units	37	50
MULTIFAMILY RESIDENTIAL - LOW RISE	220	90 units	41	50
MULTIFAMILY RESIDENTIAL - MID RISE	221	113 units	41	50
MULTIFAMILY RESIDENTIAL - HIGH RISE	222	138 units	43	50
MID-RISE RESIDENTIAL WITH 1ST FLOOR COMMERCIAL	231	138 units	41	50
SMALL OFFICE BUILDING ^a	712	5,000 SF	10	12

Source: ITE Trip Generation 10th Edition (<https://itetripgen.org/>)
a) Houses single tenant and is no more than 5,000 sf

TABLE 3: PROJECT SIZE THRESHOLDS FOR VMT SCREENING
(GENERATION OF 110 OR FEWER DAILY TRIPS)

LAND USE	ITE CODE	SIZE THRESHOLD	DAILY TRIP GENERATION
SINGLE FAMILY RESIDENTIAL	210	11 units	104
MULTIFAMILY RESIDENTIAL - LOW RISE	220	15 units	110
MULTIFAMILY RESIDENTIAL - MID RISE	221	20.0 units	109
MULTIFAMILY RESIDENTIAL - HIGH RISE	222	24 units	107
MID-RISE RESIDENTIAL WITH 1ST FLOOR COMMERCIAL	231	32 units	110
SMALL OFFICE BUILDING	712	5,000 square feet	81
SINGLE TENANT OFFICE BUILDING	715	9,750 square feet	110

Source: ITE Trip Generation 10th Edition (<https://itetripgen.org/>)

SCREENING CRITERION: LOCAL SERVING RETAIL

The OPR technical guidance recommends that retail projects be analyzed in terms of net VMT impacts (i.e. total VMT that would occur with and without the project). By increasing retail opportunities closer to homes and workplaces, local serving retail may decrease overall VMT if it substitutes for longer trips. OPR advises that **projects of 50,000 or fewer square feet for an individual retail establishment** may be used to distinguish local serving retail from more regional establishments that draw customers from greater distances.

SCREENING CRITERION: PROXIMITY TO TRANSIT

Section 15064.3 of the CEQA Guidelines specifies that residential or office **projects within one-half mile of an existing major transit station or stop along an existing high-quality transit corridor** can be presumed to have a less than significant transportation impact. Per OPR guidance and Public Resources Code § 21064.3, major transit stops are defined as a site containing an existing rail transit station or the intersection of at least two bus routes with a frequency of service interval of at least 15 minutes during the morning and afternoon peak commute periods. High-quality transit corridors are defined as having fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours. In Fairfield, the two rail stations would meet the definition of major transit stop. None of the bus routes in Fairfield currently operate at 15-minute frequencies but in combination may meet this criterion at the Fairfield Transit Center.

Figure 2 shows parcels with at least 25 percent of their area falling within one-half mile of a major transit stop or rail station. Office or residential projects located within these parcels may be presumed to have less than significant VMT impacts. The City may wish to set additional criteria such as provision or availability of active transportation infrastructure for application of this screening option.

PROJECT LOCATION SCREENING

The OPR technical guidance discusses screening of residential and office projects based on location. Residential and office projects that locate in areas with low VMT, and that incorporate similar features will also tend to generate similarly low VMT. Maps showing areas of the City that exhibit low VMT characteristics can be used to screen residential and office projects from needing to prepare a CEQA VMT analysis.

Baseline VMT maps have been prepared for the City of Fairfield using the City's travel demand model. Development of the 2020 land use scenario and technical procedures for calculating baseline VMT rates per unit of land use are described in the technical memos compiled as appendices to this report.

Figures 3-5 show the VMT generation rates for **residential and office** uses across the City with respect to the recommended thresholds of significance. These VMT rates have been calculated for the entire area covered by the Fairfield travel demand model and incorporate estimates of VMT that occurs outside the Fairfield area.

The maps show the VMT generation rates for each land use type by Transportation Analysis Zone (TAZ):

- Projects located in TAZs that are shown in **green** would be presumed to generate VMT at 85 percent or less of the baseline average rate for the Fairfield area, have less than significant transportation impacts, and would require no further VMT analysis.

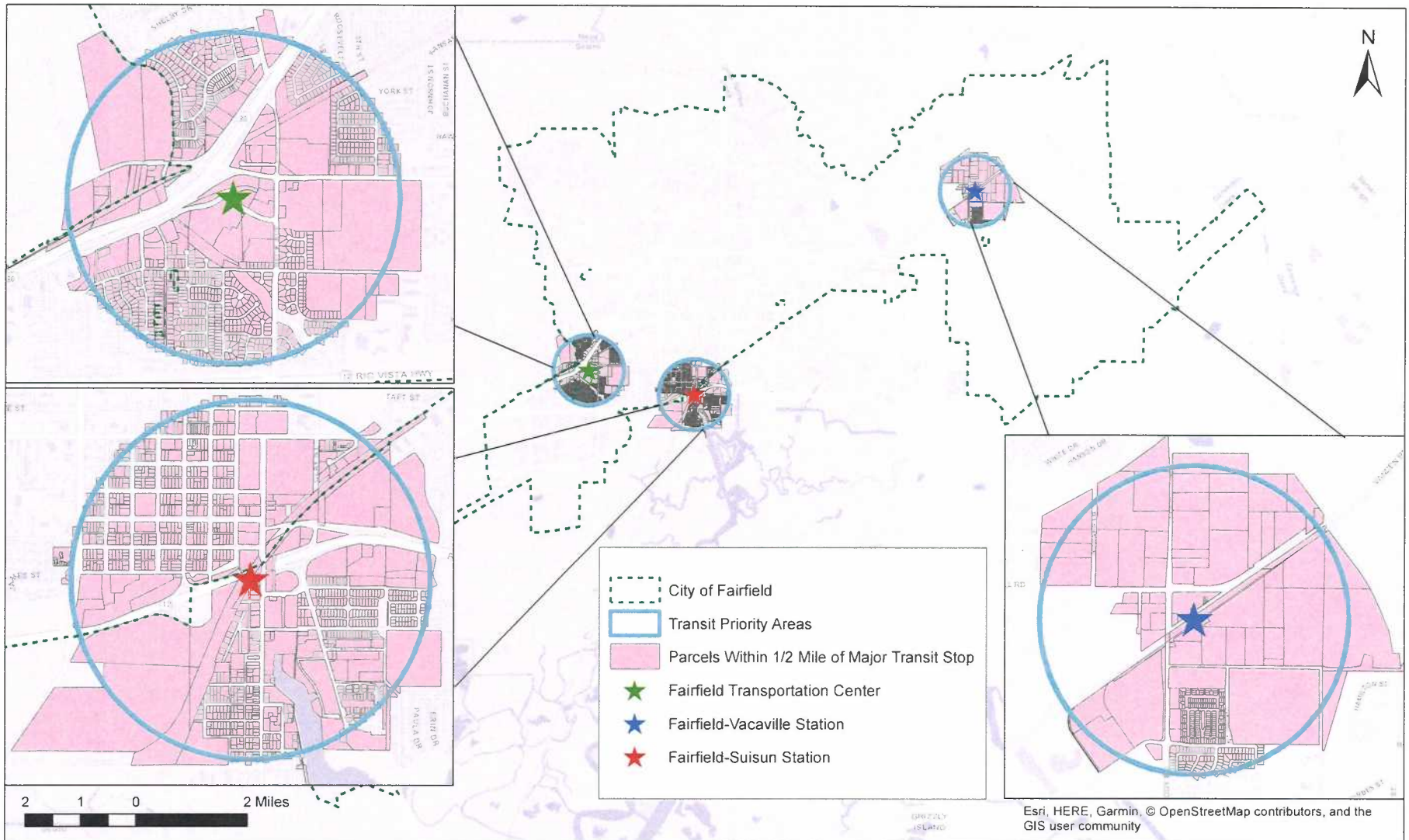


FIGURE 2. PARCELS WITHIN A HALF MILE OF MAJOR TRANSIT STOPS

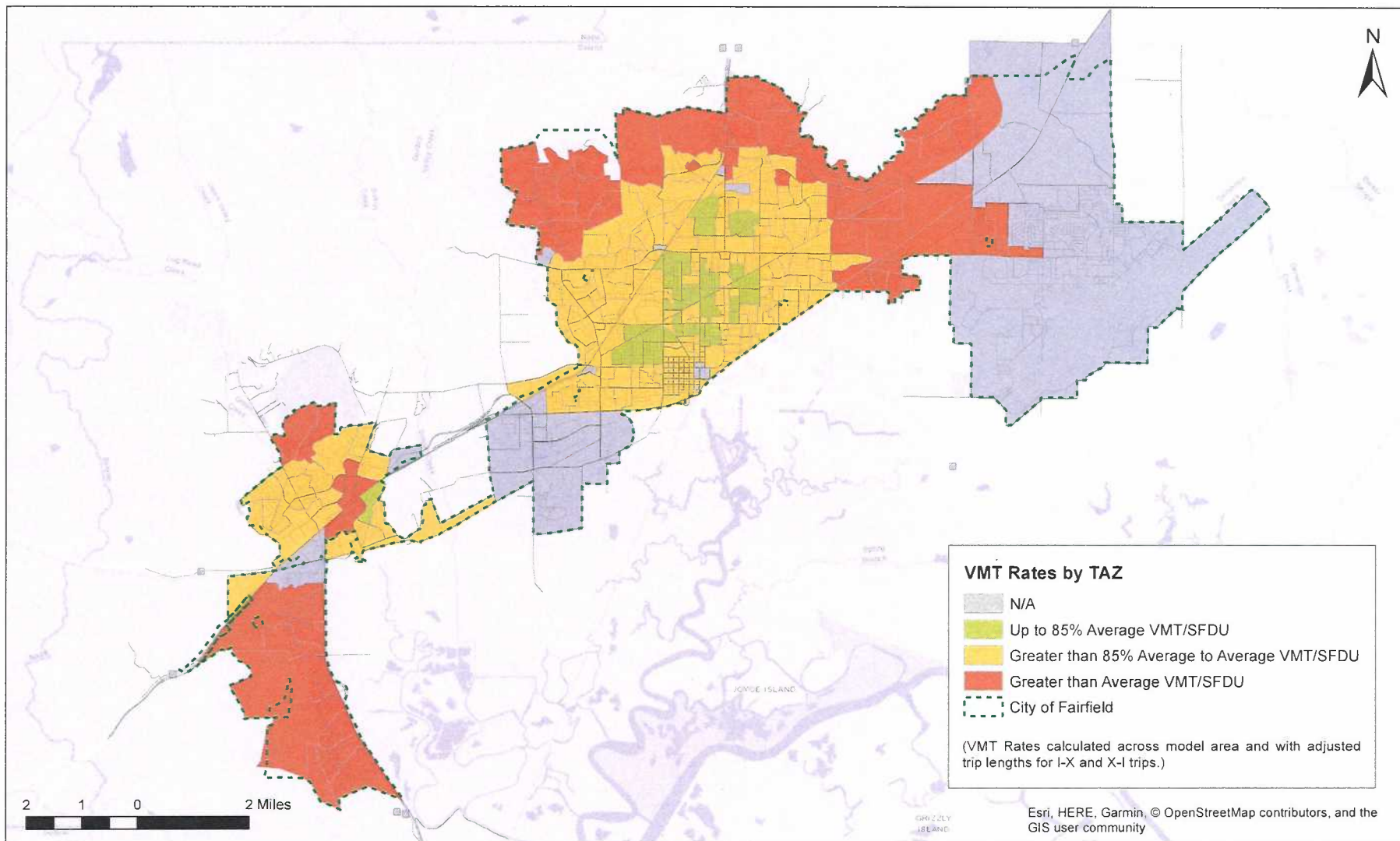


FIGURE 3. SINGLE FAMILY RESIDENTIAL VMT BY TAZ

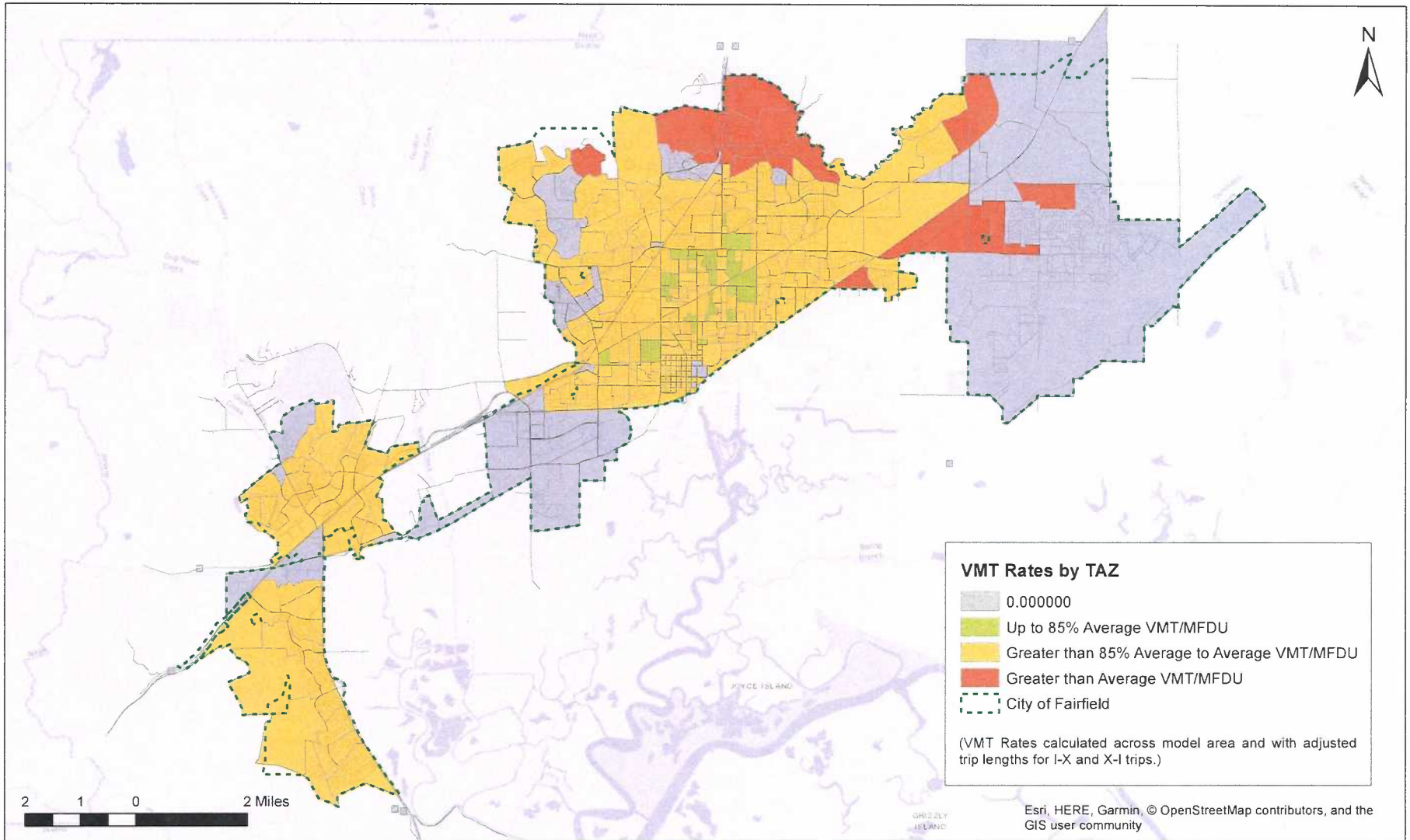


FIGURE 4. MULTIFAMILY RESIDENTIAL VMT BY TAZ

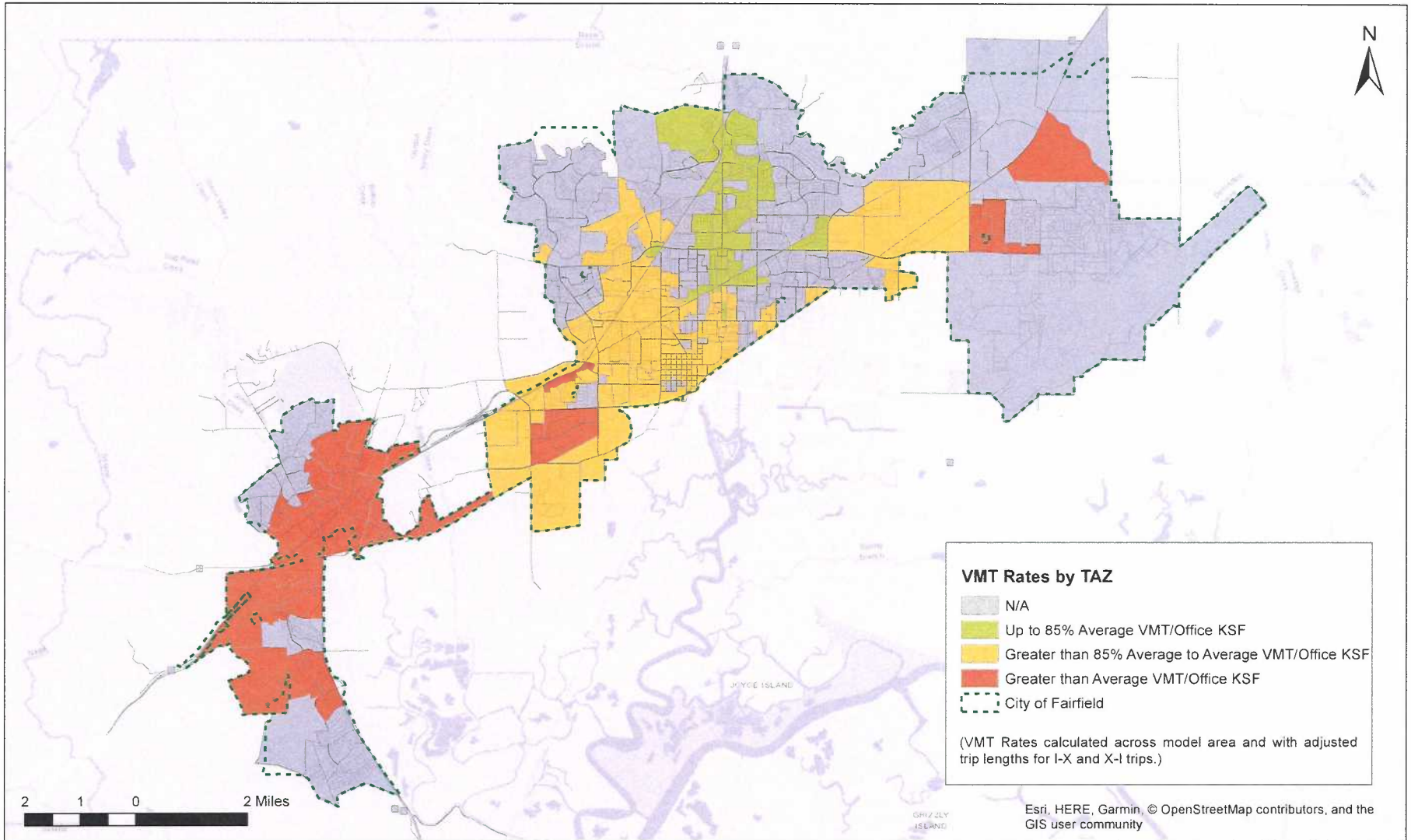


FIGURE 5. OFFICE VMT BY TAZ

- Projects located in the TAZs shown in **yellow** would be presumed to generate VMT at more than 85 percent but less than the baseline average rate for the Fairfield area (i.e. above the recommended threshold) and would require VMT analysis.
- Projects located in the TAZs shown in **red** would be presumed to generate VMT above the baseline average rate for the Fairfield area and would require VMT analysis. Projects located in the “red” TAZs, especially those in suburban greenfield sites, would be the most challenging to mitigate.

Note that many of the parcels within the Train Station Specific Plan (TSSP) area may be presumed to have less than significant VMT impacts due to proximity to the train station. Most of the remaining TSSP parcels falling outside the half mile radius do not have a VMT rate calculated directly from the model. These have been left undefined (shown in gray on the map) since the Train Station Specific Plan has an adopted Environmental Impact Report (EIR). Whether or not projects tiering from a previously adopted environmental document require additional analysis if VMT impacts were not examined is a question that has not been definitively answered from a legal standpoint. Therefore, a conservative approach would be to require VMT analysis for projects in the TSSP area that cannot otherwise be presumed less than significant due to size or transit proximity, or as a local serving retail or affordable housing project.

SECTION 3. VMT MITIGATION AND EFFECTIVENESS

VMT MITIGATION

The CAPCOA report on the effectiveness of various VMT mitigation strategies was used as the operable resource document for identifying the most suitable project level VMT mitigation strategies for the City of Fairfield. **Table 4** summarizes the recommended measures and their documented range of effectiveness. Additional detail on the evaluation of effectiveness for each method may be found in the appendix to this report.

Although the effect of multiple mitigation strategies is additive, CAPCOA establishes overall caps on maximum effectiveness when more than one mitigation strategy is applied. The recommended caps vary by land use context as follows:

- Urban settings – 75 percent maximum VMT reduction
- Compact infill settings – 35 percent maximum VMT reduction
- Suburban settings – 15 percent maximum VMT reduction

Consequently, for some very high VMT locations (red TAZs on screening maps), projects could potentially be unmitigable if located within suburban and/or greenfield settings.

MITIGATION FEE PROGRAMS

VMT mitigation banks or exchanges would provide an alternative to mitigating VMT impacts at the project site level. With a mitigation bank, developers would pay a fee in lieu of specific on-site mitigation measures. The combined fees would then be used to pay for mitigation projects across the City. With a mitigation exchange, developers would select from a pre-approved list of mitigation projects throughout the City.

Any such mitigation fee program or exchange would need to support its mitigation estimates with rigorous analysis and would be subject to the legal requirements of CEQA (i.e., CEQA mitigation monitoring requirements) and the California Mitigation Fee Act. As such, this option would not be a quick or easy undertaking.

CASE STUDY CALCULATIONS

Table 5 provides example projects subject to VMT mitigation under the proposed thresholds. As shown, two of the four example projects are not mitigatable with the candidate strategies and would result in a significant and unavoidable impact under CEQA. The examples illustrate the challenges of mitigating VMT at the project site level. This may have the intended effect for applicants to modify their projects by size, type or location to generate less VMT and align with state objectives for greenhouse gas reduction, land use efficiency, energy efficiency, and less overall reliance on the automobile.

TABLE 4. MITIGATION STRATEGIES

STRATEGY	DESCRIPTION	REPORTED RANGE OF EFFECTIVENESS	NOTES
LAND USE MEASURES			
INCREASE DENSITY	This measure involves increasing the density of the proposed project.	0.8-30%	Project density will be somewhat determined by zoning. Also, increased project densities may result in LOS or other effects during local transportation analysis.
INCREASE DIVERSITY OF URBAN AND SUBURBAN DEVELOPMENTS (MIXED USE)	Involves including more than a single land use(s) in the proposed project.	9-30%	
INTEGRATE AFFORDABLE AND BELOW MARKET RATE HOUSING	While housing developments that are 100 percent affordable may be presumed less than significant, this method provides credit for partially affordable developments.	10.2 – 32.5%	Based on percent affordable by income category.
IMPROVE DESIGN OF DEVELOPMENT (INCREASING NETWORK CONNECTIVITY)	This measure is only appropriate for larger developments and should be implemented in conjunction with complete sidewalk coverage, pedestrian crossings, street trees and other design elements that support a pedestrian-oriented environment	3-21%	Based on intersections per square mile.
NEIGHBORHOOD/SITE ENHANCEMENTS			
PEDESTRIAN NETWORK IMPROVEMENTS	Provide a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site, minimize barriers to pedestrian access and interconnectivity, eliminate physical barriers such as walls, landscaping, and slopes that impede pedestrian circulation.	1-2%	Would need to develop set of standards for pedestrian connections that go "above and beyond" existing requirements.

TABLE 4. MITIGATION STRATEGIES

STRATEGY	DESCRIPTION	REPORTED RANGE OF EFFECTIVENESS	NOTES
PROVIDE TRAFFIC CALMING MEASURES	Project design will include pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements.	0.25-1%	Depends on percent of project intersections and streets where improvements are provided.
PROVIDE BIKE PARKING IN NON-RESIDENTIAL PROJECTS	A non-residential project will provide short-term and long-term bicycle parking facilities to meet peak season maximum demand.	0.63%	Not recommended as a stand-alone strategy in the CAPCOA report but alternative literature cites a modest 0.625% reduction.
PARKING POLICY/PRICING			
LIMIT PARKING SUPPLY	The project will change parking requirements and types of supply within the project site to encourage “smart growth” development and alternative transportation choices by project residents and employees.	5-12.5%	May conflict with existing parking requirements.
UNBUNDLE PARKING COSTS	This project will unbundle parking costs from property costs. Unbundling separates parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost.	2.6-13%	Unbundle costs for parking from building rent. Fairfield market may not support this measure.
VOLUNTARY PARTICIPATION IN COMMUTE TRIP REDUCTION PROGRAM	Sites participating in a commute trip reduction program apply strategies such as preferential carpool parking and subsidized transit passes.	1-6.2%	Fairfield has a trip reduction ordinance for work sites of more than 100 employees. This program could potentially be offered as an option for mitigation but requires ongoing monitoring on part of City.

Source: California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010

TABLE 5. SAMPLE MITIGATION CALCULATIONS

PROJECT:	1. MULTIFAMILY RESIDENTIAL, 830-848 GREAT JONES	2. WISEMAN OFFICE BUILDING	3. 100 UNIT SINGLE FAMILY RESIDENTIAL PROJECT IN TAZ 354	4. 200 UNIT APARTMENT COMPLEX IN TAZ 347
BASELINE VMT PER UNIT	44.5	72.1	71.8	47.7
THRESHOLD	44.1	54.3	61.8	44.1
VMT REDUCTIONS (PERCENT):				
INCORPORATE AFFORDABLE HOUSING				0.083
IMPROVE NEIGHBORHOOD CONNECTIVITY			0.013	
PEDESTRIAN NETWORK IMPROVEMENTS	0.020	0.006	0.020	
PROVIDE TRAFFIC CALMING MEASURES			0.008	0.010
PROVIDE BIKE PARKING		0.006		
UNBUNDLED PARKING COSTS ¹		0.136		
VOLUNTARY TRIP REDUCTION PROGRAM ²		0.054		
TOTAL VMT REDUCTION³	0.020	0.202	0.041	0.093
VMT RATE AFTER MITIGATION	43.6	57.5	68.9	43.3
MITIGATED IMPACT?	Yes	No	No	Yes

Notes:

1. Assumes \$200 monthly parking charge and \$6,000 annual ownership cost
2. Assumes suburban center effectiveness rate and 100% eligibility
3. CAPCOA report recommends capping total reductions at 15% for suburban locations

REFERENCES

Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Mitigation Measures, August 2010.

STAFF REPORT

Meeting

Date: September 23, 2020

To: Chairperson and Members of the Planning Commission

From: Community Development Department

Subject: **ITEM B: SB743 IMPLEMENTATION (CEQA TRANSPORTATION ANALYSIS THROUGH VEHICLE MILES TRAVELED (VMT))**

Resolution No. 2020-15

Special Study: SS2020-003

Location: Citywide

Applicant: City of Fairfield

Property Owners: N/A

Public Hearing on request by the City of Fairfield recommending the City Council Adopt *The City Of Fairfield Senate Bill 743 Implementation Procedures* and the Thresholds of Significance and Mitigation Measures for Vehicle Miles Traveled (VMT) as Required by the California Environmental Quality Act (CEQA) Guidelines Implementing SB743 Addressing Environmental Review Of Transportation Impacts Under CEQA (Planner Brian K. Miller, 707-428-7446, bkmillier@fairfield.ca.gov; Transportation Engineer Garland Wong, 707-434-3803, gwong@fairfield.ca.gov)

BACKGROUND

A project's impacts on transportation is one of the key environmental topics reviewed by the City under the California Environmental Quality Act (CEQA). When the City determines that a project may have "significant impacts," the City may require mitigation measures such as changes in project scope and scale, new or modified traffic signals construction of new turning lanes, or even investment in alternative transportation infrastructure.

As of July 1, 2020, State law and State CEQA Guidelines mandate a change in how lead agencies review transportation impacts under CEQA. The purpose of this workshop is to review and recommend to Council a strategy for project environmental review consistent with the new State mandate.

CEQA and Thresholds of Significance

CEQA requires a lead agency to review the impacts a project would have on the existing environment, to disclose those impacts to the public and decision makers, and to address those impacts that are deemed "significant". CEQA defines a "significant impact" as a "substantial, or potentially substantial, adverse change in the environment," and places potential impacts in four categories: (1) no impact; (2) less than significant impact; (3) less

City of Fairfield
Community Development Department

Prepared by: *BKM*

Reviewed by: *DF*

than significant impact with the adoption of mitigation measures; and (4) significant and unavoidable impact.

A “threshold of significance” for a given environmental impact defines the level of effect above which the lead agency will consider impacts to be significant, and below which it will consider impacts to be less than significant.

Level of Service

In the past, the threshold used by most lead agencies for determining a significant transportation impact under CEQA was through Level of Service (LOS). Level of Service is a measure of the vehicle delay(s) faced by drivers at key intersections or arterials. An analysis of LOS begins by creating a model to study the existing volume and delay data at affected locations and then incorporating vehicle trips anticipated to be generated by the project. Ultimately, the LOS analysis is measuring the impact of new trips on the operation of the existing and proposed transportation network.

The City of Fairfield General Plan establishes a threshold of significance for transportation impacts based on measured delay (Level of Service “A” through “F”) on roadways impacted by proposed projects. In Fairfield, the LOS threshold of significance for purposes of CEQA is “D” for arterial streets during peak afternoon commute periods (PM peak hour) which represented some delay but not gridlock, “C” for collector streets, and “B” for local streets.

Vehicle Miles Traveled

The State enacted Senate Bill 743 (SB 743) in 2013 with the goal of balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions (GHG). To accomplish these goals, the legislation directed the Governor’s Office of Planning and Research (OPR) to develop different metrics for identifying effects on transportation under CEQA. The final OPR Technical Advisory was released in December of 2018 and identified “vehicle miles traveled” (VMT) per day as the most appropriate measure of transportation impacts for land use projects, land use plans, and transportation projects. The Natural Resources Agency also updated the CEQA Guidelines to require lead agencies to use VMT and prohibit the use of LOS or vehicle delay as a criterion for transportation impacts under CEQA. However, Fairfield can continue to review LOS impacts for their consistency with the adopted General Plan standard.

VMT is a measure of the number of trips and total distance in miles that a driver would have to travel between their origin and destination. In general, projects that are farther away from other land uses or that lack nearby transit options tend to generate higher VMT, while projects located closer to a variety of land uses or near high quality transit generate lower VMT. When analyzing proposed projects under CEQA, VMT has previously been used to identify other impacts related to greenhouse gas emissions and air quality. Under the updated CEQA Guidelines, VMT per resident, per employee, per student, etc., replaces LOS in measuring impacts on transportation. Whereas LOS was a measure of the delay experienced by users of the transportation infrastructure, VMT

measures the transportation efficiency of the proposed project with respect to the actual vehicle trips generated by the project.

The CEQA Guidelines and OPR Technical Advisory identify how certain types of projects might be presumed to have less than significant VMT impacts. This guidance will expedite review and approval of certain types of projects. Projects that are near transit, infill housing, centrally located office, locally serving retail, transit projects, bike projects, pedestrian enhancements, livability enhancements, street safety improvements (road diets and street calming) are all examples of projects that can typically be screened from further VMT impact review under CEQA. Note, however, that a project could still be found to have a significant transportation impact if it conflicts with existing plans, results in hazardous conditions, or results in inadequate emergency access.

Applying VMT as the measure of transportation impact will help create or encourage better more walkable neighborhoods that have access to everyday needs. The infill and transit-oriented development supported by VMT analysis can potentially help reduce overall vehicle use, reduce energy consumption, help preserve natural and agricultural lands, and reduce water consumption through more compact land use planning. Further, lower VMT is associated with additional benefits such as placemaking (creation of quality public spaces), reduction in other air pollutant emissions and water pollution, long term reduction in traffic congestion, and improvements in safety and public health, among others.

The CEQA Guidelines required lead agencies to begin using the new VMT metric on July 1, 2020. This implementation can occur on a project-by-project basis, but it is more streamlined and effective when adopted as a local threshold of significance. The VMT process requires a significant change in how the City reviews development projects. The City retained DKS Associates to assist the City with developing this new approach for environmental review under SB743. The project included several key elements:

- Identifying current baseline VMT levels for the multiple traffic analysis zones in the City.
- Developing thresholds for significant impacts under CEQA.
- Using VMT screening to identify project sizes or scopes which can be assumed to have less than significant VMT impacts thereby eliminating the need for further review under CEQA.
- Identifying areas where existing VMT levels are below the thresholds of significance and where new development is likely to also have less than significant impacts under the State requirements.
- Developing a range of project-level mitigation measures to reduce VMT.
- Updating the City Transportation Analysis Guidelines to address changes in CEQA.
- Identifying future City-wide or area-wide strategies for reducing VMT levels. This work would be addressed during the forthcoming General Plan Update.

As required by law, staff have already begun using the recommended screening criteria and thresholds identified in the revised Transportation Analysis Guidelines to review new applications. As under current standards, most smaller projects will continue to be “screened out” under the new VMT standards. However, larger and more complex projects that may generate high vehicle miles travelled numbers will now need to undertake comprehensive VMT analyses as part of their project submittals and environmental review.

DISCUSSION

As part of their scope, DKS Associates (Consultant) prepared a series of Technical Memorandums during their SB743 work for the City. The final document, *Fairfield SB743 Implementation Procedures* (Exhibit A), summarizes the consultants’ recommendations for implanting CEQA review under SB743

Thresholds of Significance and Screening Projects from Review

In order to fully implement SB743, the City needs to adopt a “threshold of significance” for Vehicle Miles Traveled for use in CEQA review of new projects. **Based on State guidance, the consultant and staff are recommending that the threshold of significance be set at 85% of the current calculated baseline VMT per land use unit, as calculated over the Fairfield traffic model area (15% below current calculated VMT levels).** The typical VMT rates for various land uses are summarized in Table 1 in the *Implementation Procedures* memo (Exhibit A).

This threshold of significance will guide staff in identifying impacts under CEQA. As noted in the memo, the City’s review process will also continue to address **locally identified transportation issues** such as safety, circulation and even LOS analysis, although the latter no longer constitutes a transportation impact under CEQA. The threshold of significance also guides the *screening* out of projects that may not need further VMT review under CEQA. The process for reviewing and screening projects is illustrated in the flow chart on Page 9 in the *Implementation Procedures* memo.

Screening can be based on several criteria. Some smaller projects can be screened as less than significant under State guidelines and the consultants’ analysis of existing VMT generation rates in Fairfield. For example, an infill single family subdivision with fewer than 11 units can be presumed to have no significant VMT impacts (Table 3 in the *Implementation Procedures Memo* (See Exhibit A)). For other land uses, the State guidelines use *net increase in VMT* as the criteria. What that means in practice is that local-serving retail (typically less than 50,000 square feet) and smaller scale medical office uses can be screened from further environmental review, as these uses generate few new trips and are likely to serve the local population, reducing the need for people to drive farther away. In the case of industrial uses, State guidance specifies that the VMT analysis pertains only to passenger vehicles and light duty trucks, and the analysis does not address heavy truck trips. Buildings with office uses and employment could use the office land use screening threshold (5,000 square feet).

Other project types that State guidelines will allow the City to screen from further review include low income housing and housing within ½ mile of a major transit facility. In

Fairfield, this would include some properties in the Train Station Specific Plan Area as well as much of downtown Fairfield. The guidelines also allow the City to screen from further review transportation and infrastructure projects unlikely to generate significant net VMT, such as maintenance and rehabilitation projects, road diets, and pedestrian, bicycle or transit improvements.

Finally, the recommended *Implementation* program allows the City to take into account those areas in Fairfield where existing VMT levels fall below the 85% threshold. The rationale here is that the area likely already has a good mix of uses and adding additional uses in this area provides for less and/or shorter trips and bundling of trips. State guidelines will allow the City to exempt from further VMT analysis many infill sites in Central Fairfield, as illustrated on the maps in the *Senate Bill 743 Implementation Procedures* memorandum (Exhibit A).

Analysis and Mitigation

Not all projects will be screened from further review under the new VMT metric. For projects in areas identified as “above” the 85% threshold or that do not meet the size or land use screening criteria, further analysis will be required. Project consultants will be required to use the City’s traffic model to analyze VMT generation rates for their project.

Many of these projects will exceed the threshold of significance, meaning that the project may have a significant effect on the environment. As with all CEQA impacts, significant transportation impacts will require mitigation. The State guidelines published by OPR in response to SB743 establish criteria for mitigation measures (Table 4 in the *Implementation Procedures Memo* (Exhibit A)), which include:

- Increasing project density
- Mixed use development (“Diversity of development”)
- Incorporating affordable housing
- Project design (to reduce trips and trip length)
- Pedestrian network improvements
- Parking demand management

As the *Implementation Procedures* memo makes clear, mitigation measures may be of limited effectiveness in mitigating VMT impacts for large projects located in high VMT areas. In cases where it is not clear that impacts can be mitigated to a less-than-significant level (or if a project has other types of significant environmental impacts), CEQA may require preparation of an Environmental Impact Report and a Statement of Overriding Considerations.

Notably, the forthcoming General Plan Update represents an opportunity to fully integrate the VMT concept and larger scale mitigation measures into the City’s development framework. These larger scale strategies have already been proposed for the Train Station Specific Plan, and the City will be working with developers in that area to recognize the inherent VMT reduction strategies in the Plan for their projects. A similar approach to planning would be appropriate for the City’s General Plan Update.

CORRESPONDENCE

N/A

ENVIRONMENTAL REVIEW

Adoption of a new local CEQA threshold of significance for VMT impacts and the adoption of the *Fairfield Senate Bill 743 Implementation Procedures* will not have a significant environmental impact and is exempt from CEQA review under Section 15308 of the CEQA Guidelines. The actions are being undertaken to comply with a State mandate (SB 743) and will be used in a regulatory process (CEQA review) that involves procedures for the protection of the natural environment.

RECOMMENDATION

Adopt Resolution 2020-15 recommending the City Council adopt a threshold of significance and mitigation measures for local CEQA review, implementing SB 743, and authorizing the Community Development Director to use the procedures and guidelines found in *Fairfield Senate Bill 743 Implementation Procedures* (Exhibit A).

Attachments:

1. Planning Commission Resolution No. 2020-15, with attached:
 - Fairfield Senate Bill 743 Implementation Procedures

**CITY OF FAIRFIELD
PLANNING COMMISSION
M I N U T E S**

Fairfield-Suisun Unified School District Board Room
2490 Hilborn Road

September 23, 2020
Regular Meeting
6:00 p.m.

I. ROLL CALL

Present: Chairperson WOOD, Chuck
Vice-Chairperson MATTHEWS, Chris
Commissioner CHILDS, Jerome
Commissioner CRUZEN, Melissa
Commissioner EVANS, Lerecia
Commissioner WESLEY, William

Absent: Commissioner COAN, Michael

II. PLEDGE OF ALLEGIANCE

The Pledge of Allegiance was led by Commissioner Evans.

III. INFORMATION ON SPEAKER CARDS

IV. APPROVAL OF AGENDA

Vice-Chairperson Matthews made a motion to approve the agenda as proposed. The motion was seconded by Commissioner Evans. Voting was done by roll call, and the motion was approved unanimously, with Commissioner Coan absent.

V. APPROVAL OF MINUTES OF AUGUST 12, 2020

Commissioner Childs made a motion to approve the minutes of July 8, 2020 as proposed. The motion was seconded by Vice-Chairperson Matthews. Voting was done by roll call, and the motion was approved unanimously, with Commissioner Coan absent.

VI. PUBLIC COMMENTS

No persons spoke during Public Comments, and no comments were received via the planning@fairfield.ca.gov inbox.

VII. SCHEDULED MATTERS

ITEM A: 7 FLAGS ELECTRONIC MESSAGE BOARD

Resolution No. 2020-13

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF FAIRFIELD APPROVING SIGN PERMIT (SN2020-027) FOR A MONUMENT SIGN WITH ELECTRONIC MESSAGE BOARD AT 1206 NORTH TEXAS STREET (APN: 030-172-040)

Associate Planner Anna Noel made a presentation on the item.

No persons spoke during the Public Hearing, and no comments were received via the planning@fairfield.ca.gov inbox.

Vice-Chairperson Matthews made a motion to adopt Resolution 2020-14 as proposed. The motion was seconded by Commissioner Childs. Voting was done by roll call, and the motion was approved unanimously, with Commissioner Coan absent.

ITEM B: SB743 IMPLEMENTATION

RESOLUTION 2020-15

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF FAIRFIELD RECOMMENDING THAT THE CITY COUNCIL ADOPT THE CITY OF FAIRFIELD SENATE BILL 743 IMPLEMENTATION PROCEDURES AND THE THRESHOLDS OF SIGNIFICANCE AND MITIGATION MEASURES FOR VEHICLE MILES TRAVELED (VMT) AS REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) GUIDELINES IMPLEMENTING SB743, TO ADDRESS ENVIRONMENTAL REVIEW OF TRANSPORTATION IMPACTS UNDER CEQA

Associate Planner Brian Miller and Erin Vaca, consultant to the City with DKS Associates made a presentation on the item and answered questions.

No persons spoke during the Public Hearing, and no comments were received via the planning@fairfield.ca.gov inbox.

Vice-Chairperson Matthews made a motion to adopt Resolution 2020-15 as proposed. The motion was seconded by Commissioner Evans. Voting was done by roll call, and the motion was approved unanimously, with Commissioner Coan absent.

ITEM C: 2020 BOARDING HOUSE REGULATIONS UPDATE

Resolution No. 2020-16

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF FAIRFIELD RECOMMENDING THAT THE CITY COUNCIL APPROVE AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF FAIRFIELD AMENDING VARIOUS SECTIONS OF CHAPTER 25, ARTICLE I OF THE FAIRFIELD CITY CODE (ALSO KNOWN AS THE ZONING ORDINANCE OF THE CITY OF FAIRFIELD) AMENDING THE DEFINITION OF "BOARDING HOUSE," AMENDING THE DEVELOPMENT STANDARDS FOR BOARDING HOUSES, AMENDING THE LAND USE TABLES PERMITTING "BOARDING HOUSE, SMALL" IN ALL RESIDENTIAL ZONING DISTRICTS, CONDITIONALLY PERMITTING "BOARDING HOUSE, LARGE" IN THE RM, RH, AND RVH ZONING DISTRICTS, CONDITIONALLY PERMITTING "BOARDING HOUSES, SMALL" AND "BOARDING HOUSES, LARGE" IN THE CN, CO, CT, CC, AND CM ZONING DISTRICTS, PERMITTING "BOARDING HOUSES, SMALL" IN THE HO, HR, AND HWT ZONING DISTRICTS, AND PERMITTING "BOARDING HOUSES, LARGE" IN THE HWT AND HTD ZONING DISTRICTS

Associate Planner Brian Miller made a presentation on the item and answered questions. Planning Division Manager Dave Feinstein also answered questions on the item.

No persons spoke during the Public Hearing, and no comments were received via the planning@fairfield.ca.gov inbox.

Commissioner Evans made a motion to adopt Resolution 2020-16 as proposed. The motion was seconded by Commissioner Childs. Voting was done by roll call, and the motion was approved unanimously, with Commissioner Coan absent.

VIII. INFORMATION AND COMMUNICATIONS

ITEM A: DIRECTOR'S REPORT AND COMMISSIONER'S COMMENTS

Planning Division Manager Dave Feinstein noted staff would bring a discussion regarding tiny house regulations to the Commission at its next meeting of October 14. Chairperson Wood asked that the item include a discussion of multifamily height regulations as well, in light of recent higher density projects that required special considerations for height. Mr. Feinstein indicated that that item would be included in the discussion.

Commissioner Wesley asked for additional information be included in the minutes to document comments by the Commission. Mr. Feinstein provided background on the minutes, which simply record actions by the Commission, with full commission discussion available on video record. He indicated that staff would return with further information on the potential to include Commissioner comments in the minutes.

IX. ADJOURNMENT TO NEXT MEETING OF AUGUST 26, 2020

Respectfully submitted,

DAVID FEINSTEIN
Planning Commission Secretary