AGENDA
REGULAR MEETING OF THE CITY OF SUISUN CITY
PLANNING COMMISSION
6:00 P.M., AUGUST 25, 2020

COUNCIL CHAMBERS
701 CIVIC CENTER BOULEVARD
SUISUN CITY, CALIFORNIA 94585

DUE TO CORONAVIRUS COVID-19 RESIDENTS ARE ENCOURAGED TO ATTEND THE PLANNING COMMISSION MEETING VIA THE APPLICATION, ZOOM. ZOOM MEETING INFORMATION:

WEBSITE: https://zoom.us/join
MEETING ID: 818 3208 2339
CALL IN PHONE NUMBER: (707) 438-1720

TO VIEW THE MEETING ON THE SUISUN CITY WEBSITE, LIVESTREAM (URL: https://www.suisun.com/government/meeting-video/)

REMOTE PUBLIC COMMENT IS AVAILABLE FOR THE PLANNING COMMISSION MEETING BY EMAILING JKEARNS@SUISUN.COM (PRIOR TO 5:30PM) OR VIA WEBSITE OR PHONE APPLICATION, ZOOM

Next Resolution No. PC20-06

1. CALL TO ORDER.

2. ROLL CALL:
Chairperson Ramos
Vice-Chair Rowe
Commissioner Borja
Commissioner Clemente
Commissioner Holzwarth
Commissioner Pal
Commissioner Thomas

Pledge of Allegiance
Invocation

3. APPROVAL OF AGENDA:
Approval of Planning Commission agenda of August 25, 2020.

4. APPROVAL OF MINUTES:
Approval of Planning Commission minutes of June 24, 2020.

5. PUBLIC COMMENT:
This is a time for public comments for items that are not listed on this agenda. Comments should be brief. If you have an item that will require extended discussion, please request the item be scheduled on a future agenda.

6. CONFLICT OF INTEREST NOTIFICATION:
(Any items on this agenda that might be a conflict of interest to any Commissioner should be identified at this time.)

7. CONSENT CALENDAR: NONE

8. CONTINUED ITEMS: NONE

9. PUBLIC HEARINGS:
For each of the following items, the public will be given an opportunity to speak. After a Staff Report, the Chair will open the Public Hearing. At that time, the applicant will be allowed to make a presentation. Members of the public will then be allowed to speak. After all have spoken, the applicant is allowed to respond to issues raised by the public, after which the Public Hearing is normally closed. Comments should be brief and to the point. The Chair reserves the right to limit repetitious or non-related comments. The public is reminded that all decisions of the Planning Commission are appealable to the City Council by filing a written Notice of Appeal with the City Clerk within ten (10) calendar days.

10. GENERAL BUSINESS:

A. Resolution No. PC20-___, A Resolution of the Planning Commission of the City of Suisun City Recommending City Council Approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds

11. INFORMATIONAL ITEMS: NONE

12. REPORTS BY STAFF AND PLANNING COMMISSION:

A. Staff

B. Planning Commission

13. AGENDA FORECAST / FUTURE AGENDA ITEMS.

14. ADJOURNMENT.

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MINUTES
SPECIAL MEETING OF THE CITY OF SUISUN CITY PLANNING COMMISSION
6:00 P.M., June 24, 2020

COUNCIL CHAMBERS
701 CIVIC CENTER BOULEVARD
SUISUN CITY, CALIFORNIA
94585

DUE TO CORONAVIRUS COVID-19 RESIDENTS ARE ENCOURAGED TO ATTEND THE PLANNING COMMISSION MEETING VIA THE APPLICATION, ZOOM. ZOOM MEETING INFORMATION:

WEBSITE: https://zoom.us/join
MEETING ID: 883 9045 5279
CALL IN PHONE NUMBER: (707) 438-1720

TO VIEW THE MEETING ON THE SUISUN CITY WEBSITE, LIVESTREAM (URL: https://www.suisun.com/government/meeting-video/)

REMOTE PUBLIC COMMENT IS AVAILABLE FOR THE PLANNING COMMISSION MEETING BY EMAILING JKEARNS@SUISUN.COM (PRIOR TO 5:30PM) OR VIA WEBSITE OR PHONE APPLICATION, ZOOM

Next Resolution No. PC20-05

1. CALL TO ORDER.

2. ROLL CALL:

Commissioners Present:
Chairperson Ramos
Vice-Chair Rowe
Commissioner Clemente
Commissioner Holzwarth
Commissioner Pal

Commissioners Absent:
Commissioner Borja
Commissioner Thomas

Pledge of Allegiance led by Chairperson Ramos
Invocation by Senior Planner Kearns

3. APPROVAL OF AGENDA:

Commissioner Clemente motioned for the approval of Planning Commission agenda of June 24, 2020. Commissioner Rowe seconded the motion. Motion passed: Ayes, Ramos, Rowe, Clemente,

Holzwarth, Pal

4. APPROVAL OF MINUTES:

Commissioner Clemente motioned for the approval of Planning Commission agenda of May 12, 2020. Commissioner Holzwarth seconded the motion. Motion passed: Ayes, Ramos, Rowe, Clemente, Holzwarth, Pal

5. PUBLIC COMMENT:

None

6. CONFLICT OF INTEREST NOTIFICATION

None

7. CONSENT CALENDAR:

None

8. CONTINUED ITEMS:

None

9. PUBLIC HEARINGS:

For each of the following items, the public will be given an opportunity to speak. After a Staff Report, the Chair will open the Public Hearing. At that time, the applicant will be allowed to make a presentation. Members of the public will then be allowed to speak. After all have spoken, the applicant is allowed to respond to issues raised by the public, after which the Public Hearing is normally closed. Comments should be brief and to the point. The Chair reserves the right to limit repetitious or non-related comments. The public is reminded that all decisions of the Planning Commission are appealable to the City Council by filing a written Notice of Appeal with the City Clerk within ten (10) calendar days.

A. Resolution No. PC20-___, A Resolution of the Planning Commission of the City of Suisun City Approving Addition of Parking Stalls and Temporary Storage Containers on Property Located at 621 Railroad Avenue (APN 0037-090-060).

Senior Planner John Kearns gave a brief background of the Addition of Parking Stalls and Temporary Storage Containers at 621 Railroad Avenue.

Senior Planner John Kearns read a letter from Mr. Mark Ellsworth into the record.

Chairperson Ramos asked the Commission for clarifying questions to Staff.

Chairperson Ramos opened the public hearing.

Eric Whann, Cubix Asset Management, representing Vince Schwab, was available to respond to

Commission questions.

Barb Ellsworth spoke in support of project.

Chairperson Ramos closed the public hearing.

Commissioner Clemente motioned for the approval of Planning Commission Resolution PC 20-___: Approving Addition of Parking Stalls and Temporary Storage Containers on Property Located at 621 Railroad Avenue (APN 0037-090-060) with amendments to PW-23, coordination with adjacent landowner regarding a future block wall, allowable hours of operation, and to bring back in one year for review. Commissioner Pal seconded the motion. Motion passed by the following vote:

Commissioners: Ayes: Clemente, Pal, Holzwarth, Rowe, Chair Ramos
Commissioners: Noes: None

10. GENERAL BUSINESS:

None

11. INFORMATIONAL ITEMS:

12. REPORTS BY STAFF AND PLANNING COMMISSION:

A. Staff

Senior Planner John Kearns reported staff be attending a meeting on our Good Neighbor Policy and discuss Conditional Use Permits and how they work together.

B. Planning Commission

Commissioner Pal announced in May he and his wife welcomed a baby girl.

13. AGENDA FORECAST / FUTURE AGENDA ITEMS.

14. ADJOURNMENT. 7:05 P.M.

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Planning Commission Agenda Report Meeting Date 8/26/2020

Files:

DATE: 8/26/2020

TO: PLANNING COMMISSION

FROM: John Kearns, Senior Planner (707.421.7337, jkearns@suisun.com)

RE: Resolution No. PC20-___: A Resolution of the Planning Commission of the City of Suisun City Recommending City Council Approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds.

SUMMARY

Senate Bill (SB) 743 (Steinberg, 2013) and subsequent amendments to the California Environmental Quality Act ("CEQA") CEQA Guidelines (§15064.3, amended December 2018) require the use of vehicle-miles traveled (VMT) as the metric for the assessment of impacts in the CEQA Transportation section. SB 743 also removes congestion-based metrics, such as Level of Service (LOS), from CEQA consideration for land use projects as "a project's effect on automobile delay shall not constitute a significant environmental impact" (§15064.3(a)). The provisions of SB 743 and CEQA guidelines §15064.3 apply statewide as of July 1, 2020.

It is noted that SB 743 does not change laws and regulations related to the General Plan and the City may still require that a land use project's effects on the circulation system be analyzed for consistency with General Plan goals and policies (as part of a non-CEQA, informational analysis); similarly, SB 743 does not change the City's AB 1600 traffic impact fee program, whereby fees are charged to land use projects to fund circulation system improvements.

CEQA analysis typically requires the use of thresholds of significance to determine if a project's effect in a given environmental topic area rises to the level of requiring mitigation. As the City has not performed VMT analysis for the purposes of CEQA Transportation analysis, the City has not yet developed generally-applicable thresholds of significance using VMT as the metric. CEQA Guidelines §15064.7 govern several principles behind thresholds of significance, including the following provisions:

- §15064.7(b): Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).
- §15064.7(c): When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

Recommendation: Planning staff recommends adoption of Resolution No. PC20-___; A Resolution of the Planning Commission of the City of Suisun City Recommending City Council Approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds.

Proposed Motion: I move that the Planning Commission adopt Resolution No. PC20-___, A Resolution of the Planning Commission of the City of Suisun City Recommending City Council Approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds.

BACKGROUND/DISCUSSION

The shift from LOS to VMT focuses on regional traffic patterns and reducing greenhouse gas (GHG) emissions, rather than vehicle delays on local roadway networks. Reliance upon a VMT metric for evaluating environmental impacts is intended to:

- Streamline CEQA review for projects that improve pedestrian, bicycle and transit facilities.
- Facilitate residential, commercial and mixed-use infill projects close to transit.
- Shift the focus of mitigation measures from improvements that benefit vehicles to improvements that enhance access, safety and usability for pedestrians, bicyclists and transit users.
- Promote policies that:
    - Minimize Green House Gas (GHG) emissions from transportation by shifting travel modes away from single occupancy vehicles.
    - Encourage development of safe walkable and pedestrian scale communities.
    - Enhance sustainability and resilience by reducing vehicle trips and length.
    - Discourage urban/suburban sprawl.

Pursuant to SB 743, lead agencies in California are expected to use VMT in CEQA Transportation section analyses by July 1, 2020. CEQA Guidelines Section 15064.7(c) notes that "When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." Although adoption of general-use VMT thresholds in Suisun City has not occurred prior to July 1, 2020, the City is actively working to adopt local VMT thresholds and establish Suisun City's VMT program as soon as possible.

In the interim, while a Suisun City-specific VMT program is being developed, the City of Suisun City will apply the recommended screening methodology and thresholds set forth in Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (dated December 2018).

The City is under contract with traffic consulting firm Fehr & Peers to assist the City with the transition from LOS to VMT. Fehr & Peers has suggested the use of the Faifield Traffic Demand Model in conducting VMT implementation work for the city. It is OPR's strong recommendation that a travel demand model be used in the calculation of VMT as a model captures the interactions between land uses in the City and region as a whole.

General Plan and Zoning

General Plan

The implementation of VMT for CEQA transportation analysis relates to Chapter 4, Transportation including *Goal T-3: Manage travel demand in order to reduce up-front and ongoing cost of transportation infrastructure, enhance local mobility, improve air quality, and improve the local quality of life.* In support of this goal is Objective T-3, several policies, and Program T-3.1. All of these items are contained on Page 4-24 of the Suisun City General Plan. Further, many other goals/objectives/policies/ and programs support VMT throughout the General Plan.

Zoning

SB 743 implementation will not require any zoning changes, nor will its implementation create any inconsistencies within the Zoning Ordinance.

ANALYSIS

Metrics and Methods

The VMT metrics used under SB 743 typically consist of a partial accounting of VMT which is focused on promoting a more efficient land use pattern in terms of reducing driving by residents, reducing commuting by automobile, and the efficient placement of retail and commercial establishments. These metrics include the following:

1. **Residential Projects – All Home-Based VMT per Resident:** This metric evaluates the VMT for all trips with a start or end at a dwelling unit made by residents. As the Fairfield model is a trip-based model, it is not possible to associate non-home-based (NHB) trips back to an individual household (though NHB trips are included in the model). Thus, all residential VMT is associated with trip productions at the home (e.g., to work, to shop, to school, to recreate, etc.). Additionally, the small proportion of home-based trips that are "attractions" (e.g., pizza delivery, UPS delivery, etc.) are excluded due to complexity of tracking this particular type of trip. Since the exclusion is applied for all residential uses and is linear in nature, it does not affect residential VMT efficiency.

2. **Office/Industrial (Employment-Focus) Projects – All Home-Based Work Trip ("Commute") VMT per Employee**: This metric evaluates the VMT for all employee trips that travel between home and work. Trips related to non-commute economic activity (i.e. goods deliveries, customer visits, etc.) would not be captured in this metric. The focus of this metric is on commute trips as being the primary component of VMT for most employment-focused land uses.

3. **Retail Projects –Total Citywide VMT**: This metric evaluates all VMT (for all trip purposes by all users) that occurs within a geographic boundary. This metric is used for retail developments because they have a tendency to cause shoppers to shift their existing travel patterns, and in some cases (e.g. a new supermarket in a food desert) could actually cause trips to shorten and thereby result in a net decrease in area-wide VMT.

These metrics have been selected by most agencies throughout California that have completed their SB 743 implementation process.

Model VMT Metric Estimates
The City of Fairfield model provides estimates of VMT metrics for land uses in the City of Suisun City. The model VMT metric estimates are key in setting baseline values to be used in CEQA thresholds going forward. It is noted, however, that the "base year" thresholds (described in the next section) rely on a rolling baseline – that is, the base year baseline metric value should be re-considered on a project-by-project basis when each project's Notice of Preparation is released.

Proposed VMT Thresholds
This section presents the thresholds of significance pertaining to VMT that Suisun City will apply when analyzing the transportation impacts of land use projects under CEQA. While VMT is one of the metrics required to be included in the CEQA transportation section per SB 743, analyses of a land use project's impacts on bicycle/pedestrian facilities, transit, construction, emergency access, nonstandard design features, etc. are still expected. It is noted that the VMT-based CEQA transportation thresholds below rely on a partial VMT metric (consistent with guidance from OPR), while other CEQA topics (e.g. Air Quality, Greenhouse Gases, etc.) will require a more complete accounting of VMT.

Page 10 of the *Technical Advisory* states that OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. Lacking any other information that would suggest a different threshold should be applied, the City of Suisun City has concluded that this threshold should be applied for land use projects in the City.

<u>Proposed VMT Thresholds of Significance – Residential Land Uses</u>
For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of residential land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based VMT per resident that is greater than 85 percent of the City-wide average.
2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

<u>Proposed VMT Thresholds of Significance – Office and Industrial Land Uses</u>
For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of office and industrial land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based work VMT per employee that is greater than 85 percent of the city-wide average.
2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield's travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Retail Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of retail land use projects under CEQA.

1. The project would cause a significant transportation impact if it would cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Atypical and Mixed-Use Projects

Special consideration will be necessary to analyze VMT impacts for land uses that do not fit into the categories noted previously. Common examples include hotels, medical centers, churches, schools/colleges, specialty retail uses, etc. These uses should be analyzed on a case-by-case basis using available information and applying the general intent of the *Technical Advisory* and the residential, office/industrial and retail thresholds described previously.

Additionally, projects that feature a mix of complementary land uses on-site should be analyzed using a technical approach geared toward the specifics of the project. The *Technical Advisory* describes two possible approaches: (1) analyze (considering internalized trips) and determine significant impacts of each project component separately, or (2) consider significant impacts based on the project's dominant land use.

Proposed VMT Thresholds of Significance for Transportation Projects

This section provides an introductory discussion of how transportation projects should be evaluated under CEQA. Since this is a complex and evolving topic, only a high-level overview is provided.

Technical Advisory Guidance on VMT Impacts from Transportation Projects Pages 19-28 of the *Technical Advisory* discuss a number of aspects of this topic. The following summary outlines the key recommendations of this portion of the *Technical Advisory*:

1. *The "induced vehicle travel" caused by certain transportation projects must be quantified*. Projects that would likely lead to a "measurable and substantial" increase in vehicle travel (i.e., VMT) generally include: addition of through lanes on existing or new highways, including general purposes lanes, carpool lanes, auxiliary lanes, or lanes through grade-separated interchanges.
2. *A variety of transportation projects would not be expected to induce more vehicle travel*. The following page lists these project types, though it is noted that evidence is not provided to support that conclusion of no net VMT.
3. *A generally accepted interpretation of the Technical Advisory is that a transportation project that causes a net increase in VMT would be considered to have a significant impact.* Although a specific significance threshold is not provided in the *Technical Advisory*, it states on multiple occasions that transportation projects that do not generate additional

VMT are presumed to have less-than-significant impacts. Part 2b of Section 15064.3 of the CEQA Guidelines (Determining the Significance of Transportation Impacts) states that "Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact."

4. *VMT attributable to a project should represent the difference in VMT with and without the project across the full area in which driving patterns are expected to change.* VMT should not be truncated at model or jurisdictional boundaries.
5. *Mitigation for VMT impacts caused by transportation projects may include tolling new lanes, converting general purpose lanes to carpool/express lanes, funding/implementing travel demand management strategies, and implementing Intelligent Transportation Systems (ITS) strategies.*

Proposed VMT Threshold of Significance – Transportation Projects

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following threshold of significance when analyzing the VMT transportation impacts of transportation projects under CEQA.

1. A transportation project would cause a significant transportation impact if it would lead to induced travel and increased VMT.

The above calculation will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions. Induced VMT calculations will be performed in accordance with Caltrans guidance and consider elasticity values in addition to data from the City of Fairfield travel demand model.

CEQA REVIEW

No environmental review is required.

NEXT STEPS

Per CEQA Guidelines §15064.7, general use thresholds should be adopted by City Council by ordinance, resolution, rule, or regulation. In addition to this step, several next steps after adoption of thresholds may be considered to provide more a more complete implementation process that reflects local conditions. These steps include, but are not limited to, the following:

- **Review and revision of the screening criteria in the *Technical Advisory*:** The screening criteria in the *Technical Advisory* may be too broad for the types of projects that ultimately would be proposed going forward. Many agencies are considering modifying the screening criteria to better fit community views on the types of development that should be streamlined (e.g. reducing the size of the local-serving retail screening criteria or prohibiting projects with drive-throughs from qualifying for screening).
- **Review and revision of the City of Fairfield travel demand model:** The metrics have been derived from the "off-the-shelf" version of the City of Fairfield model, and reflect global inputs that may or may not precisely reflect travel behavior for land uses in the City of Suisun City. Updating the model for more Suisun City-specific data may improve the performance of the model relative to actual VMT generated.
- **Considering City-wide mitigation and funding strategies:** Mitigation for VMT impacts is very different than mitigation for LOS impacts. Mitigation measures designed to reduce

VMT focus on shortening trip lengths or reducing the number of trips. The effectiveness of these measures is difficult to quantify (to the standard expected under CEQA) when applied on a project-by-project basis, which could potentially lead to some projects having significant and unavoidable VMT impacts because of a lack of information to prove that the feasible mitigation measures would actually reduce the impact to a less-than-significant level. Additionally, these mitigation measures would need to be monitored for effectiveness over time, thus adding to the cost and complexity of mitigation measures. Many agencies are considering adopting agency-wide VMT mitigation strategies and funding those strategies through VMT-based mitigation fees, similar to the City's current traffic impact fee that funds congestion-related improvements.

PUBLIC CONTACT

The agenda was posted on the Suisun City website. As of the date of this report, no additional inquiries regarding this item had been received by City staff.

DISTRIBUTION

Internal

- PC Distribution
- City Manager Greg Folsom
- Senior Planner John Kearns

External

- City Website https://www.suisun.com/planning-commission/

ATTACHMENTS

1. PC 20-__: A Resolution of the Planning Commission of the City of Suisun City Recommending City Council Approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds.
    - EXHBIIT A: Draft Thresholds of Significance
2. Suisun City SB 743 Implementation: Summary of Findings and Recommendations for VMT-Based CEQA Thresholds
3. PowerPoint Presentation

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RESOLUTION NO. PC 20-

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SUISUN CITY RECOMMENDING CITY COUNCIL APPROVAL OF VEHICLE MILES TRAVELED (VMT) BASED CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) THRESHOLDS.

WHEREAS, On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. These changes include elimination of automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. The law directed the Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines to include new criteria (e.g., metrics) for determining the significance of transportation impacts; and

WHEREAS, the 2035 Suisun City General Plan recognized the need to transition from Level of Service (LOS) to Vehicle Miles Traveled (VMT) by including relevant goals, objectives, policies and programs; and

WHEREAS, the City has determined the Fairfield Travel Demand Model was the model appropriate model in undertaking VMT analysis in the City of Suisun City; and

WHEREAS, the City of Suisun City secured the services of Fehr and Peers to begin implementing SB 743 as it relates to California Environmental Quality Act (CEQA) thresholds; and

WHEREAS, a report by the City Staff was presented and made a part of the recommendations of said meeting; and

WHEREAS, the Planning Commission did take a presentation from Staff and Fehr and Peers, and considered all written and verbal testimony presented at the meeting;

NOW, THEREFORE, BE IT RESOLVED THAT the Planning Commission of the City of Suisun City does hereby recommend City Council approval of Vehicle Miles Traveled (VMT) Based California Environmental Quality Act (CEQA) Thresholds as contained as Exhibit A of this resolution.

The forgoing motion was made by Commissioner _____ and seconded by Commissioner _____ and carried by the following vote:

AYES: Commissioners:
NOES: Commissioners:
ABSENT: Commissioners:
ABSTAIN: Commissioners:

WITNESS my hand and the seal of said City this 25th day of August 2020.

_____
Commission Secretary

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VMT Thresholds of Significance

These thresholds of significance pertain to VMT that Suisun City will apply when analyzing the transportation impacts of land use projects under CEQA. While VMT is one of the metrics required to be included in the CEQA transportation section per SB 743, analyses of a land use project's impacts on bicycle/pedestrian facilities, transit, construction, emergency access, nonstandard design features, etc. are still expected. It is noted that the VMT-based CEQA transportation thresholds below rely on a partial VMT metric (consistent with guidance from OPR), while other CEQA topics (e.g. Air Quality, Greenhouse Gases, etc.) will require a more complete accounting of VMT.

Page 10 of the *Technical Advisory* states that OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. Lacking any other information that would suggest a different threshold should be applied, the City of Suisun City has concluded that this threshold should be applied for land use projects in the City.

Proposed VMT Thresholds of Significance – Residential Land Uses
For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of residential land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based VMT per resident that is greater than 85 percent of the City-wide average.
2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Office and Industrial Land Uses
For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of office and industrial land use projects under CEQA:

1. The project would cause a significant transportation impact if it would generate an average home-based work VMT per employee that is greater than 85 percent of the city-wide average.
2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield's travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Retail Land Uses
For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of retail land use projects under CEQA.

1. The project would cause a significant transportation impact if it would cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Atypical and Mixed-Use Projects
Special consideration will be necessary to analyze VMT impacts for land uses that do not fit into the categories noted previously. Common examples include hotels, medical centers, churches, schools/colleges, specialty retail uses, etc. These uses should be analyzed on a case-by-case basis using available information and applying the general intent of the *Technical Advisory* and the residential, office/industrial and retail thresholds described previously.

Additionally, projects that feature a mix of complementary land uses on-site should be analyzed using a technical approach geared toward the specifics of the project. The *Technical Advisory* describes two possible approaches: (1) analyze (considering internalized trips) and determine significant impacts of each project component separately, or (2) consider significant impacts based on the project's dominant land use.

Proposed VMT Thresholds of Significance for Transportation Projects
This section provides an introductory discussion of how transportation projects should be evaluated under CEQA. Since this is a complex and evolving topic, only a high-level overview is provided.

***Technical Advisory* Guidance on VMT Impacts from Transportation Projects**
Pages 19-28 of the *Technical Advisory* discuss a number of aspects of this topic. The following summary outlines the key recommendations of this portion of the *Technical Advisory*:

1. *The "induced vehicle travel" caused by certain transportation projects must be quantified*. Projects that would likely lead to a "measurable and substantial" increase in vehicle travel (i.e., VMT) generally include: addition of through lanes on existing or new highways, including general purposes lanes, carpool lanes, auxiliary lanes, or lanes through grade-separated interchanges.
2. *A variety of transportation projects would not be expected to induce more vehicle travel*. The following page lists these project types, though it is noted that evidence is not provided to support that conclusion of no net VMT.
3. *A generally accepted interpretation of the Technical Advisory is that a transportation project that causes a net increase in VMT would be considered to have a significant impact*. Although a specific significance threshold is not provided in the *Technical Advisory*, it states on multiple occasions that transportation projects that do not generate additional VMT are presumed to have less-than-significant impacts. Part 2b of Section 15064.3 of

the CEQA Guidelines (Determining the Significance of Transportation Impacts) states that "Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact."

4. *VMT attributable to a project should represent the difference in VMT with and without the project across the full area in which driving patterns are expected to change.* VMT should not be truncated at model or jurisdictional boundaries.
5. *Mitigation for VMT impacts caused by transportation projects may include tolling new lanes, converting general purpose lanes to carpool/express lanes, funding/implementing travel demand management strategies, and implementing Intelligent Transportation Systems (ITS) strategies.*

Proposed VMT Threshold of Significance – Transportation Projects

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory* (see **Exhibit 1**), the City of Suisun City will apply the following threshold of significance when analyzing the VMT transportation impacts of transportation projects under CEQA.

1. A transportation project would cause a significant transportation impact if it would lead to induced travel and increased VMT.

The above calculation will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions. Induced VMT calculations will be performed in accordance with Caltrans guidance and consider elasticity values in addition to data from the City of Fairfield travel demand model.

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FEHR PEERS

Draft Memorandum

Date: July 10, 2020

To: John Kearns, City of Suisun City

From: Ashlee Takushi and Ian Barnes, Fehr & Peers

Subject: Suisun City SB 743 Implementation: Summary of Findings and Recommendations for VMT-Based CEQA Thresholds

WC20-3730

Introduction

This memorandum presents recommendations for implementing Senate Bill (SB) 743 in the City of Suisun City. This memorandum is organized into the following sections:

- *Section I (Background)* – describes background information on SB 743, relevant CEQA Guidelines, and a simple definition of Vehicle-Miles of Travel (VMT).
- *Section II (VMT Metrics and Methods)* – presents information about available travel demand models and VMT estimate calculations using the City of Fairfield travel demand model.
- *Section III (Proposed VMT Thresholds of Significance for Land Use Projects)* – presents specific thresholds of significance the City may consider using when evaluating land use projects under CEQA.
- *Section IV (Proposed VMT Thresholds of Significance for Roadway Projects)* – presents specific thresholds of significance the City may consider using when evaluating roadway projects under CEQA, including project types that are presumed to be less-than-significant.
- *Section V (Next Steps)* – discusses further opportunities in the implementation process that can be used to streamline development review and develop meaningful mitigation strategies.

I. Background

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. These changes include elimination of automobile delay, level of service (LOS), and other similar

measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. The law directed the Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines to include new criteria (e.g., metrics) for determining the significance of transportation impacts.

OPR selected VMT as the transportation impact metric, recommended its application statewide, and submitted updates to the CEQA Guidelines that were certified by the Natural Resources Agency in December 2018. The requirements of SB 743 became effective statewide on July 1, 2020 – all CEQA analyses performed after this date must use VMT for the evaluation of motorized transportation impacts (unless a project can be screened out of this analysis requirement).

To help aid lead agencies with SB 743 implementation, OPR produced the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018). The *Technical Advisory* helps lead agencies think about the variety of implementation questions they face with respect to shifting to a VMT metric. The guidance is not a recipe for SB 743 implementation since lead agencies must still make their own specific decisions about methodology, thresholds, and mitigation.

OPR hosted a series of webinars in Spring 2020, in which they provided verbal interpretations and clarifications of the Te*chnical Advisory*. Fehr & Peers regularly attends these webinars and notes these staff interpretations such that their latest guidance is reflected in memoranda such as this.

Intent of SB 743

The following two legislative intent statements are contained in the SB 743 statute:

1) Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the CEQA.

2) More appropriately balance 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.

These statements are important because they provide direction to OPR, lead agencies and CEQA judges. For OPR, the direction is largely about what the new metrics should achieve. For lead agencies, the direction is about expected changes in transportation analysis plus what factors to consider for significance thresholds.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e. the General Plan), fee programs, or on-going network operational monitoring, but these metrics will not form a determination of significant impacts under CEQA. Cities or counties can still use vehicle LOS outside of the CEQA process if they determine it is an important part of their transportation analysis process. The most common applications will likely occur for jurisdictions wanting to use vehicle LOS to size roadways in their General Plan or determine nexus

relationships for their impact fee programs. Jurisdictions can also continue to condition projects to build transportation improvements through the entitlement process (i.e., conditions of approval) in a variety of ways, such as using General Plan policy consistency findings.

Relevant CEQA Guidelines

This section presents the precise language contained in the most recent CEQA guidelines pertaining to this topic.

CEQA Section 15064.3 (Determining the Significance of Transportation Impacts)

This section defines VMT as "the amount and distance of automobile travel attributable to a project". It describes certain conditions (e.g., proximity to a transit stop) for land use projects that should be presumed to cause a less than significant transportation impact. It concludes that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact.

> **_New_ Section 15064.3. Determining the Significance of Transportation Impacts.**
>
> **(a) Purpose.**
>
> **This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "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 and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.**
>
> **(b) Criteria for Analyzing Transportation Impacts.**
>
> **(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.**

CEQA SECTION 15064.3, PART 4

This section states that the lead agency has the discretion to choose the most appropriate methodology for evaluating a project's VMT.

> **(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. 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. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.**
>
> **(c) Applicability.**
>
> **The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.**

CEQA Guidelines Section 15064.7 (Thresholds of Significance)

This section encourages public agencies to develop and publish thresholds of significance to be used in determining the significance of environmental effects.

> **§ 15064.7. Thresholds of Significance.**
>
> (a) ~~**Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects.**~~ A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance 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 be less than significant.
>
> (b) **Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects.** Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. **Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).**

Technical Advisory on Evaluating Transportation Impacts in CEQA

The 26-page *Technical Advisory* provides guidance for how professional planners and CEQA practitioners should approach SB 743 implementation including recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

Page 1 of the document states the following:

- The *Technical Advisory* does not alter lead agency discretion in preparing environmental documents subject to CEQA.
- The *Technical Advisory* should not be construed as legal advice.
- OPR is not enforcing or attempting to enforce any part of the recommendations.

Given the length, technical depth, and wide range of topics addressed in the *Technical Advisory*, it is not summarized here. However, it is cited frequently in the following chapters.

VMT 101

This subsection presents a high-level overview of what VMT is and what it is not.

1. By definition, one (1) VMT is defined as one mile driven by a vehicle (regardless of the number of occupants).
2. VMT is commonly expressed as a daily value (in miles) for a typical weekday when schools are in session.
3. All VMT metrics presented in this report comprise those which are recommended by OPR for use in CEQA transportation analysis.. Chapter III discusses the VMT calculations in more detail.

While VMT is a useful metric for quantifying the efficiency of a given mix of land uses and roadway network enhancements, it is not a direct measure of congestion or delay nor does it help to answer questions about operational characteristics of a road system (such as deciding whether an intersection should be controlled by a traffic signal, a roundabout, or another method). For these reasons, many cities choose to continue to use LOS analysis to address operational issues, while using VMT analysis for environmental impact purposes.

The following link provides a brief instructional video further defining VMT:
http://www.fehrandpeers.com/sb743/

II. VMT Metrics and Methods

This section presents the evaluation of the candidate travel demand models for use in estimating VMT in Suisun City, a recommendation for the VMT metrics to be considered in CEQA transportation analysis, and the VMT values for the base year and cumulative (General Plan buildout) scenarios.

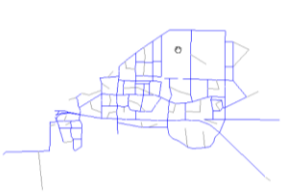
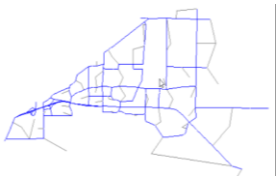
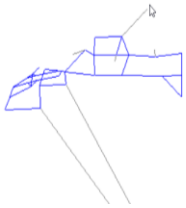
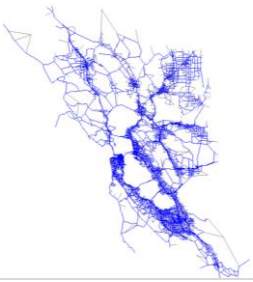
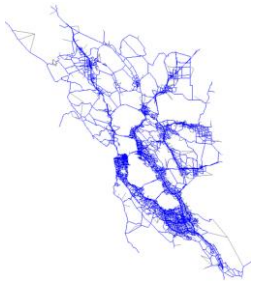
Review of Candidate Travel Demand Models

A number of travel demand models could provide estimates of VMT for land uses in the City of Suisun City. Three of these models include the City of Fairfield travel demand model, the Solano-Napa Activity-Based Model (SNABM), and the Metropolitan Transportation Commission's (MTC) Travel Model One. While the City of Fairfield model is primarily developed to estimate travel patterns in the City of Fairfield itself, the model covers the City of Suisun City, and has historically been used to estimate traffic volumes and VMT for projects in Suisun City (including use in the General Plan update). These models were evaluated based on the following characteristics:

- Model structure
- Calibration year
- Model detail within Suisun City
- Model boundaries
- Level of trip truncation at model boundaries
- Model run time
- Key limitations requiring action

The results of the comparison are summarized on the next page in **Table 1**.

Table 1: Travel Demand Forecasting Model Comparison

Evaluation Criteria	City of Fairfield Model	Solano-Napa ABM	MTC Model
Model Structure	Trip-Based Model	Activity-Based Model	Activity-Based Model
Calibration Year[1]	2020	2015	2015
Model Detail within Suisun City	High: 72 TAZs and 604 Links 	Medium: 38 TAZs and 508 Links 	Low: 5 TAZs and 87 Links 
Model Boundaries	Fairfield and Suisun City 	Nine-County Bay Area 	Nine-County Bay Area 
Level of Suisun City Trips Truncated at Model Boundaries	High: All trips leaving Suisun City and Fairfield are truncated at the city limits.	Low: Only trips leaving Nine-County Bay Area are truncated	Low: Only trips leaving Nine-County Bay Area are truncated
Model Run Time	~15 mins	~30-40 hours	~24-32 hours
Key Limitations Requiring Action	The Fairfield TDF Model might not be accurate in forecasting future traffic as the development outside of the city generate complex travel patterns within the city.	Model requires specialized computing resources and high level of technical expertise to run. Editing Model Inputs for land use projects requires substantial time and cost.	Model sensitivity to local project land use changes is untested. Changing model inputs for land use projects requires substantial time and cost.
Recommendation	**Recommended:** - Finer model TAZ and network details. - Fairfield TDF model accounts for planned development growth and is sensitive to small scale development projects within the model - Short run time	**Not Recommended:** - Model is very sensitive to small changes to residential land uses and is only recommended if a project is adding more than 100 households. - Time consuming to make land use changes - Extremely long run time	**Not Recommended:** - Coarse model detail in off-the-shelf version - Time consuming to make land use changes - Long run time

Source: Fehr & Peers, 2020.

As noted in **Table 1**, it is recommended that the City of Fairfield model be used to estimate VMT for projects in Suisun City. This recommendation is made on the basis that the Fairfield model has very detailed roadway network and TAZ detail in the City, the model is relatively quick to run (15 minutes versus over 24 hours for the other models), and the model provides good sensitivity to changes in local land use inputs.

The City of Fairfield model does truncate trips at the city limits of Suisun City and Fairfield, which should be addressed moving forward. Methods are available to analysts that allow for the estimation of the lengths of trips outside the model boundary for appending to the VMT calculation. These methods include, but are not limited to, reviewing trip lengths from the SNABM or California Statewide Model, and using Big Data trip length information.

VMT Metrics

The *Technical Advisory* notes that the VMT to be considered as part of the CEQA transportation analysis would generally take the form of an efficiency metric (i.e. VMT per capita or per employee) and be focused on VMT generated by automobiles and light duty trucks (i.e. pickup trips). This differs from the VMT estimates historically analyzed in the Air Quality, Greenhouse Gas, and Energy analysis CEQA sections, which require a full accounting of all VMT generated (including VMT generated by heavy trucks).

Additionally, the VMT metrics used under SB 743 typically consist of a partial accounting of VMT which is focused on promoting a more efficient land use pattern in terms of reducing driving by residents, reducing commuting by automobile, and the efficient placement of retail and commercial establishments. These metrics include the following:

1. **Residential Projects – All Home-Based VMT per Resident:** This metric evaluates the VMT for all trips with a start or end at a dwelling unit made by residents. As the Fairfield model is a trip-based model, it is not possible to associate non-home-based (NHB) trips back to an individual household (though NHB trips are included in the model). Thus, all residential VMT is associated with trip productions at the home (e.g., to work, to shop, to school, to recreate, etc.). Additionally, the small proportion of home-based trips that are "attractions" (e.g., pizza delivery, UPS delivery, etc.) are excluded due to complexity of tracking this particular type of trip. Since the exclusion is applied for all residential uses and is linear in nature, it does not affect residential VMT efficiency.

2. **Office/Industrial (Employment-Focus) Projects – All Home-Based Work Trip ("Commute") VMT per Employee**: This metric evaluates the VMT for all employee trips that travel between home and work. Trips related to non-commute economic activity (i.e. goods deliveries, customer visits, etc.) would not be captured in this metric. The focus of this metric is on commute trips as being the primary component of VMT for most

employment-focused land uses.

3. **Retail Projects –Total Citywide VMT**: This metric evaluates all VMT (for all trip purposes by all users) that occurs within a geographic boundary. This metric is used for retail developments because they have a tendency to cause shoppers to shift their existing travel patterns, and in some cases (e.g. a new supermarket in a food desert) could actually cause trips to shorten and thereby result in a net decrease in area-wide VMT.

These metrics have been selected by most agencies throughout California that have completed their SB 743 implementation process.

Model VMT Metric Estimates

The City of Fairfield model provides estimates of VMT metrics for land uses in the City of Suisun City. The model VMT metric estimates are key in setting baseline values to be used in CEQA thresholds going forward. It is noted, however, that the "base year" thresholds (described in the next section) rely on a rolling baseline – that is, the base year baseline metric value should be re-considered on a project-by-project basis when each project's Notice of Preparation is released. The estimates of base year (2020) and cumulative year (2035) VMT metrics are presented below in **Table 2**. Maps showing the geographic distribution of VMT metric estimates are presented in **Attachment A**.

Table 2: Suisun City VMT Metric Estimates (from City of Fairfield Model)

VMT Metric	Typical Land Use for Metric	Base Year (2020) City of Fairfield Model Value	Cumulative (2035) City of Fairfield Model Value
Home-Based VMT per Resident	Residential	13.8	12.4
Home-Based Work "Commute" VMT per Employee	Office/Industrial (i.e. non-retail employment)	14.8	14.1
Total City-wide VMT	Retail	470,414	874.491

Source: Fehr & Peers, 2020.

The estimates in **Table 2** suggest that, while total City-wide VMT increases in aggregate, the home-based VMT per resident and home-based work VMT per employee metrics decrease over time; this trend is generally consistent with most agencies throughout California.

III. Proposed VMT Thresholds of Significance for Land Use Projects

This section presents the thresholds of significance pertaining to VMT that Suisun City will apply when analyzing the transportation impacts of land use projects under CEQA. While VMT is one of the metrics required to be included in the CEQA transportation section per SB 743, analyses of a land use project's impacts on bicycle/pedestrian facilities, transit, construction, emergency access, nonstandard design features, etc. are still expected. It is noted that the VMT-based CEQA transportation thresholds below rely on a partial VMT metric (consistent with guidance from OPR), while other CEQA topics (e.g. Air Quality, Greenhouse Gases, etc.) will require a more complete accounting of VMT.

Page 10 of the *Technical Advisory* states that OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. Lacking any other information that would suggest a different threshold should be applied, the City of Suisun City has concluded that this threshold should be applied for land use projects in the City.

Proposed VMT Thresholds of Significance – Residential Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of residential land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based VMT per resident that is greater than 85 percent of the City-wide average.
2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Office and Industrial Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of office and industrial land use projects under CEQA.

1. The project would cause a significant transportation impact if it would generate an average home-based work VMT per employee that is greater than 85 percent of the city-wide average.

2. If the above threshold is exceeded, the project's VMT impact could still be found to be less-than-significant if it did not cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield's travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Retail Land Uses

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory*, the City of Suisun City will apply the following thresholds of significance when analyzing the VMT transportation impacts of retail land use projects under CEQA.

1. The project would cause a significant transportation impact if it would cause the total City-wide VMT to increase.

The above calculations will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions.

Proposed VMT Thresholds of Significance – Atypical and Mixed-Use Projects

Special consideration will be necessary to analyze VMT impacts for land uses that do not fit into the categories noted previously. Common examples include hotels, medical centers, churches, schools/colleges, specialty retail uses, etc. These uses should be analyzed on a case-by-case basis using available information and applying the general intent of the *Technical Advisory* and the residential, office/industrial and retail thresholds described previously.

Additionally, projects that feature a mix of complementary land uses on-site should be analyzed using a technical approach geared toward the specifics of the project. The *Technical Advisory* describes two possible approaches: (1) analyze (considering internalized trips) and determine significant impacts of each project component separately, or (2) consider significant impacts based on the project's dominant land use.

IV. Proposed VMT Thresholds of Significance for Transportation Projects

This section provides an introductory discussion of how transportation projects should be evaluated under CEQA. Since this is a complex and evolving topic, only a high-level overview is provided.

Technical Advisory Guidance on VMT Impacts from Transportation Projects

Pages 19-28 of the *Technical Advisory* discuss a number of aspects of this topic. The following summary outlines the key recommendations of this portion of the *Technical Advisory*:

1. *The "induced vehicle travel" caused by certain transportation projects must be quantified*. Projects that would likely lead to a "measurable and substantial" increase in vehicle travel

(i.e., VMT) generally include: addition of through lanes on existing or new highways, including general purposes lanes, carpool lanes, auxiliary lanes, or lanes through grade-separated interchanges.

2. *A variety of transportation projects would not be expected to induce more vehicle travel*. The following page lists these project types, though it is noted that evidence is not provided to support that conclusion of no net VMT.
3. *A generally accepted interpretation of the Technical Advisory is that a transportation project that causes a net increase in VMT would be considered to have a significant impact*. Although a specific significance threshold is not provided in the *Technical Advisory*, it states on multiple occasions that transportation projects that do not generate additional VMT are presumed to have less-than-significant impacts. Part 2b of Section 15064.3 of the CEQA Guidelines (Determining the Significance of Transportation Impacts) states that "Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact."
4. *VMT attributable to a project should represent the difference in VMT with and without the project across the full area in which driving patterns are expected to change.* VMT should not be truncated at model or jurisdictional boundaries.
5. *Mitigation for VMT impacts caused by transportation projects may include tolling new lanes, converting general purpose lanes to carpool/express lanes, funding/implementing travel demand management strategies, and implementing Intelligent Transportation Systems (ITS) strategies.*

Proposed VMT Threshold of Significance – Transportation Projects

For projects that do not qualify for any of the screening opportunities presented in the *Technical Advisory* (see **Exhibit 1**), the City of Suisun City will apply the following threshold of significance when analyzing the VMT transportation impacts of transportation projects under CEQA.

1. A transportation project would cause a significant transportation impact if it would lead to induced travel and increased VMT.

The above calculation will be performed using the City of Fairfield travel demand model for both base year and cumulative conditions. Induced VMT calculations will be performed in accordance with Caltrans guidance and consider elasticity values in addition to data from the City of Fairfield travel demand model.

Exhibit 1. Projects on Page 21 of the *Technical Advisory* that are presumed to not cause a significant transportation impact

- Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor

V. Next Steps

Per CEQA Guidelines §15064.7, general use thresholds such as those presented in **Section III and Section IV** of this memorandum should be adopted by City Council by ordinance, resolution, rule, or regulation. In addition to this step, several next steps after adoption of thresholds may be considered to provide more a more complete implementation process that reflects local conditions. These steps include, but are not limited to, the following:

- **Review and revision of the screening criteria in the *Technical Advisory*:** The screening criteria in the *Technical Advisory* may be too broad for the types of projects that ultimately would be proposed going forward. Many agencies are considering modifying the screening criteria to better fit community views on the types of development that should be streamlined (e.g. reducing the size of the local-serving retail screening criteria or prohibiting projects with drive-throughs from qualifying for screening).
- **Review and revision of the City of Fairfield travel demand model:** The metrics presented in this memorandum have been derived from the "off-the-shelf" version of the City of Fairfield model, and reflect global inputs that may or may not precisely reflect travel behavior for land uses in the City of Suisun City. Updating the model for more Suisun City-specific data may improve the performance of the model relative to actual VMT generated.
- **Considering City-wide mitigation and funding strategies:** Mitigation for VMT impacts is very different than mitigation for LOS impacts. Mitigation measures designed to reduce VMT focus on shortening trip lengths or reducing the number of trips. The effectiveness of these measures is difficult to quantify (to the standard expected under CEQA) when applied on a project-by-project basis, which could potentially lead to some projects having significant and unavoidable VMT impacts because of a lack of information to prove that the feasible mitigation measures would actually reduce the impact to a less-than-significant level. Additionally, these mitigation measures would need to be monitored for effectiveness over time, thus adding to the cost and complexity of mitigation measures. Many agencies are considering adopting agency-wide VMT mitigation strategies and funding those strategies through VMT-based mitigation fees, similar to the City's current traffic impact fee that funds congestion-related improvements.

Implementing SB 743 in Suisun City

Presented by Ian Barnes, PE
Fehr & Peers

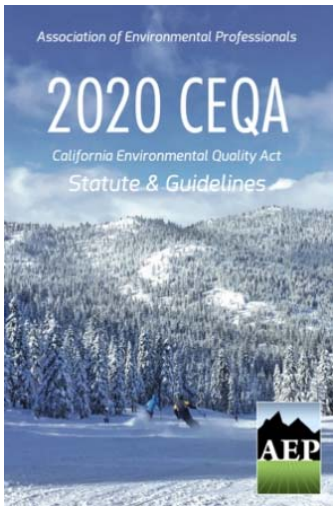
City of Suisun City
Planning Commission

August 25, 2020

FEHR PEERS

1

CEQA.



CEQA Requires…

- Analyzing a project's environmental effects, including those related to transportation
- "Good faith effort" (§15151)
- "Not use scientifically outdated information"
- "Analysis should improve as more and better data becomes available"

2

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2

SB 743.

Balance desire for local congestion management with state's goals for:

- **Encouraging infill development**
- **Improving public health through active transportation**
- **Reducing greenhouse gas emissions**

3

FEHR PEERS

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SB 743.

SB 743 changes how Transportation Impacts are Measured in CEQA

- Must use Vehicle Miles of Travel (VMT) in CEQA analysis
- Must not use LOS as CEQA standard
- Can still use LOS to define physical improvements

Shift focus: Impacts to drivers → Impacts from driving

4

FEHR PEERS

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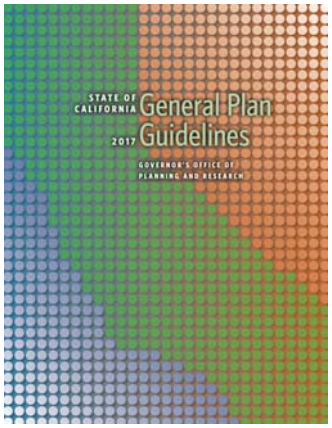
SB 743.



SB 743 Does Not Change…

- General Plans
- Traffic Impact Fee Programs
- State Constitution
- Subdivision Map Act

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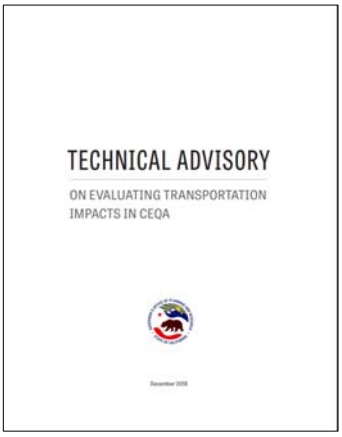
Implementation.



OPR *Technical Advisory*

- Advisory = Not Binding
- Gives general guidance:
  - Metrics
  - Methods
  - Thresholds (15% below baseline, or 85% of the baseline)
  - Screening Criteria

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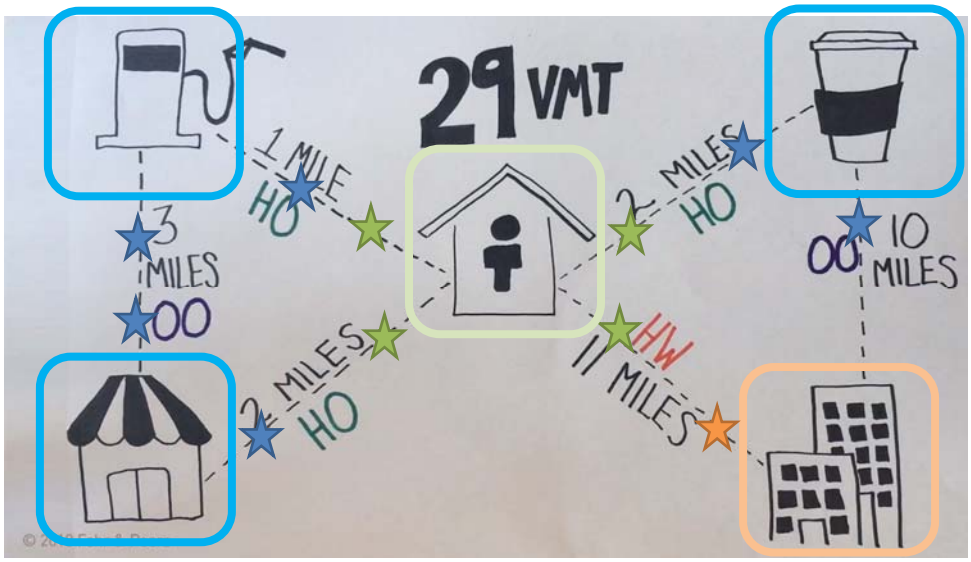
Metrics.



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Methods.

- OPR highly recommends the use of a travel demand model to calculate VMT
- City of Fairfield travel demand model

City of Fairfield Travel Demand Model

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Draft Thresholds.

RESIDENTIAL PROJECTS

Baseline project-generated home-based VMT per resident exceeds

85%

of Existing **City-wide** average

EMPLOYMENT PROJECTS

Baseline project-generated home-work VMT per worker exceeds

85%

of Existing **City-wide** average

Note: If above thresholds are exceeded, a project's VMT impact could still be found to be less-than significant if total City-wide VMT does not increase.

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Draft Thresholds.

RETAIL PROJECTS

Project results in a net increase in total City-wide VMT

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Other Project Types

MIXED-USE PROJECTS

Analyze each part of project separately

OR

Analyze dominant land use

HOTELS, HOSPITALS, ETC.

Analyze different VMT generating parts of the project using relevant criteria

Patients/Guests: Regional Serving
Employees: Employment

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Transportation Projects

TRANSPORTATION PROJECTS

Project leads to induced travel and increased VMT.

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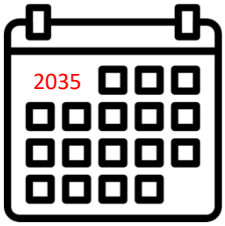
Analysis Horizon.

All Non-Screened Projects:

Near-Term Analysis
Existing plus Project

All Non-Screened Projects:



Cumulative Analysis
Year 2035

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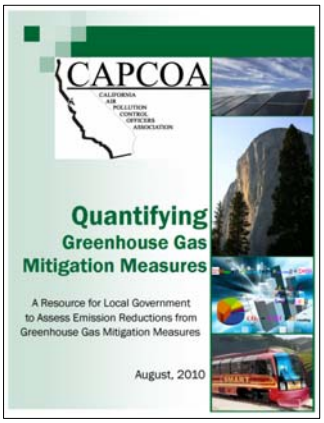
Mitigation Strategy.



Reduce number of vehicle trips

- Change size or characteristics of project
- Improve transit access
- Subsidize transit passes
- Encourage walking and biking (more ped/bike facilities, worksite amenities, bike parking)
- Unbundle parking

Reduce length of vehicle trips

- Increase access to common goods & services
- Locate project close to nearby population

Critical Step: Demonstrating effectiveness

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Questions?

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