LOCAL GUIDELINES FOR CEQA REVIEW

Adopted by City Council on September 18, 2007 by Resolution No. 07-113
Revised by City Council on June 3, 2014 by Resolution No. 14-49
Revised by City Council on September 6, 2022 by Resolution No. 22-111

CITY OF BENICIA

LOCAL GUIDELINES FOR CEQA REVIEW

I. INTRODUCTION

A. **PURPOSE OF THESE GUIDELINES:** The purpose of these local guidelines ("Local Guidelines") is to supplement, not replace the California Environmental Quality Act (CEQA) State Law requirements which are found in the California Public Resources Code Sections 21000 – 21178 and the official State CEQA Guidelines prescribed by the Secretary of Resources, found in the California Code of Regulations Title 14, Chapter 3, Section 15000 - 15387 ("State Guidelines"). Applicants should refer to and follow the State Guidelines to ensure compliance with the majority of requirements under CEQA. These Local Guidelines contain information and requirements specific to the City of Benicia regarding Fees, Methodology, and Thresholds of Significance. Any ambiguities or conflicts are to be resolved in favor of the State Law and Regulations which are incorporated herein by reference.[1]

II. FEES

The City of Benicia will charge and collect reasonable fees (approved by the City Council) to recover the partial or full costs incurred by the City in preparing and implementing environmental documents not covered in contractual agreements with consultants. Additionally, the City may seek cost recovery through a deposit and reimbursement agreement between the City and applicant for such costs. These activities may include, but are not limited to:

a. Filing a Notice of Exemption.
b. A fee to recover costs of preparation of the Initial Study (including subsequent preparation of a Draft Negative Declaration and filing of a Notice of Determination where applicable).
c. Solicitation of proposals and administration of a consultant contract for preparation of an Environmental Impact Report (EIR) or Negative Declaration and processing of related environmental documents.
d. A fee to recover costs of implementing the Mitigation Monitoring and Reporting Program.
e. A fixed fee to cover costs of processing appeals.
f. In addition, the Community Development Department shall charge and collect a fee from members of the public for the actual cost of reproducing an environmental document requested by the member of the public after the initial number of copies provided in the EIR contract have been distributed.

The City provides an up-to-date fee schedule detailing the charges for these services.

III. THRESHOLDS OF SIGNIFICANCE

Section 15064.B.2 of the State CEQA Guidelines acknowledges the value of locally adopted thresholds of significance in evaluating the potential for a project to impact the environmental. The City of Benicia has developed and adopted the following methodology and significance thresholds to be used in evaluation of project impacts pursuant to CEQA.

Transportation Impacts – Vehicle Miles Traveled (VMT) Analysis Methodology for Land Use Projects (Appendix A)

Appendix A establishes the local process for reviewing transportation impacts for the purposes of CEQA, using the State recommended VMT metric and the Solano-Napa Activity Based Model (SNABM). It establishes criteria for when VMT analysis must be conducted on a project specific basis and when transportation impacts can be presumed to be less than significant based off of project attributes (screening criteria). The threshold of significance is a 0% reduction from the citywide average residential or work tour VMT, which is equal to the SNABM Residential and Work Tour Citywide VMT Averages. Appendix A also includes mitigation measures that may be applied to projects in order to achieve a less than significant transportation impact.

APPENDIX LIST

A. VEHICLE MILES TRAVELED (VMT) ANALYSIS METHODOLOGY FOR LAND USE PROJECTS IN BENICIA

Appendix A:

Vehicle Miles Traveled (VMT) Analysis Methodology for Land Use Projects in Benicia

The information contained in this Appendix A shall be considered part of the City of Benicia's Local Guidelines for CEQA as revised by the City Council on September 6, 2022 by Resolution No. 22-111 The information herein is based on a memorandum prepared by Fehr & Peers, a transportation planning firm, at the direction of the City of Benicia. It describes a methodology for compliance with the requirements of Senate Bill 743 (SB 743) regarding analysis of vehicle miles traveled (VMT) for land use projects that are subject to the California Environmental Quality Act (CEQA). This guidance is intended to provide methodology by which Land Use Projects will be evaluated and assist the City of Benicia in its CEQA VMT analyses. **Figure 1** illustrates the CEQA VMT analysis process described in Sections 3, 4, and 5.

The methodology contained in this memorandum is based largely on guidance from the Governor's Office of Planning and Research (OPR) entitled *Technical Advisory on Evaluating Transportation Impacts in CEQA* (also referred to as the Technical Advisory), dated December 2018. Benicia staff may amend this methodology, including the target VMT thresholds, if there is new guidance from OPR or other relevant agencies and/or if new substantial evidence indicates that changes to the City's VMT thresholds are appropriate. Analysts implementing this methodology for individual project assessments should clearly document the assumptions, procedures, and methods used to reach conclusions about the VMT analysis.

The methods outlined in this memorandum primarily rely on the Solano-Napa Activity Based Model (SNABM), a travel demand forecasting model maintained by the Solano Transportation Authority (STA), to generate estimates of VMT for different land use types in different locations. Simple single-use projects may not require a new application of the SNABM and may only need to refer to maps of model outputs which were prepared as part of the City's VMT methodology and threshold setting process (included in **Appendix A**). Note, however, that new maps would need to be prepared when updates to the SNABM occur (generally, models are updated every five to ten years). Note also that the use of the model may be supplemented by or replaced by use of other data sources when appropriate to provide a more robust analysis; such sources include market studies demonstrating the likely trip lengths for employees and customers of commercial projects; location-based service data (via a data vendor such as StreetLight) demonstrating the VMT characteristics of the project location and/or of similar project types; census data demonstrating the local travel modes and trip lengths near the project site; or other relevant data.

The guidance contained in this memorandum is intended to apply to the VMT evaluation of land use projects. Evaluating the VMT effects of land use plans may follow the same concepts and principles outlined in this memorandum, with special consideration for cumulative impacts given the potentially longer build-out schedule for land use plans.

The evaluation of VMT impacts is also required as part of the CEQA review of transportation projects, which is not addressed in this memorandum. The OPR Technical Advisory contains guidance (see pages 19-25 of the OPR Technical Advisory) on conducting environmental analysis of transportation projects, including a list of project types considered to be unlikely to lead to substantial or measurable increases in VMT. Another source of guidance for lead agencies is Caltrans, which has developed guidance to address the evaluation of VMT impacts of projects on the state highway system. More information on Caltrans guidance can be found at https://dot.ca.gov/programs/sustainability/sb-743.

1. Definitions

Analyst refers to the person conducting the VMT impact analysis, usually a lead agency staff person or a transportation or CEQA consultant.

Baseline year. The base year of the SNABM that is used to represent existing conditions. Note that the model is not updated every year, so there may be a discrepancy between the base year of the model and the current year. In all cases, CEQA requires using the best data currently available.

Solano-Napa Activity Based Model (SNABM). The travel demand model maintained by STA for use in producing forecasts of future transportation system usage. The model is an activity-based model that focuses on Solano and Napa counties, but encompasses the entire nine-county Bay Area region. Analysts may contact STA for guidance on how to apply the model and extract the relevant VMT metrics. Note that OPR guidance requires that the full lengths of all trips be accounted for, and not truncated at the model boundary (except when analyzing boundary VMT, as discussed below).

CEQA. The California Environmental Quality Act. This statute requires identification of any significant environmental impacts due to certain state or local actions including approval of new development or infrastructure projects. The process of identifying these impacts is typically referred to as the environmental review process.

Employment Generating Uses/Projects. Office, industrial, logistics or other land uses where most of the activity at the site is related to employment functions.[1]

Home-based VMT. VMT for trips that begin or end at a residence.

Work Tour VMT. VMT associated with trips between a residence and an employment-generating use, as well as any other trips made throughout the day by the employee to/from the employment use.[2]

Horizon year. The planning horizon year used for cumulative analysis. Currently, the horizon year of the SNABM is 2040.

Level of Service (LOS). A metric that assigns a letter grade to transportation network performance. The most common application of LOS has been to measure the average amount of delay experienced by vehicle drivers along a roadway segment or at an intersection during the most congested time of day, and to assign a rating that ranges from LOS A (fewer than 10 seconds of delay) to LOS F (more than 80 seconds of delay). Per the requirements of SB 743, LOS and other measures of vehicle delay can no longer be used in determining significant impacts under CEQA.

Local-Serving Uses/Projects. Commercial land uses that are expected to draw users from a local area, as opposed to drawing trips from a larger region that would otherwise be made between more proximate uses. These uses may generally include local-serving public facilities such as a branch library, a police or fire station, neighborhood-based schools, and local-serving retail businesses such as grocery stores, coffee shops or dry cleaners. Given Benicia's relatively small geographic footprint (14.1 square miles) and separation from adjacent communities (Vallejo to the west, Fairfield/Suisun City to the north, and Martinez to the south), uses that are expected to primarily serve the city may generally be considered local-serving uses. The definition of local-serving uses may be subject to interpretation on a project by project basis, using substantial evidence.

Low VMT Areas. An area of the city that has existing VMT that is at or below the citywide average for home-based VMT per resident or for work tour VMT per employee (depending on the project). These areas are typically defined based on the VMT by TAZ maps, but may be defined using a different methodology with substantial evidence. If TAZ maps are used, the analyst should confirm the maps are up to date and represent the latest available information.

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[1] Analysis of non-employee trips (such as those made by trucks) is not required for employment-based uses since it is assumed that these trips are either 1) incidental compared to employee trips and/or 2) constitute trips to and from way points along a trip from a product's ultimate origin to its ultimate destination.

[2] Note that this definition is used due to the way that activity-based models like the SNABM track trips, as opposed to the home-work definition that would be used if a four-step travel demand model were used.

Mixed Use Projects/Uses: Projects that consist of a mix of uses otherwise described in this document.

Other Uses/Other Projects: Uses and projects which do not qualify as Residential, Employment-Generating, Local-Serving, or Regional-Serving (all of which are defined in this document).

Physical Design Measures. VMT reduction strategies that involve changes to the built environment. Examples include changes to the density or mixture of land uses, or the installation of new pedestrian or bicycle facilities.

Regional-Serving Uses/Projects. Land uses that are expected to draw users from a region that is larger than that for "local-serving uses" (see above). These uses may generally include regional-serving public facilities such as a regional museum, private schools and colleges, large entertainment venues, and regional retailers such as shopping malls, and big box retailers.

Residential Uses/Projects: Uses and projects consisting solely of residential units such as single-family and multi-family units.

Service Population. All residents and employees within a study area.

Target VMT Threshold. The level of VMT generation defined as being necessary to avoid a significant VMT impact. The target VMT threshold in this document is being set at or below the existing citywide home-based VMT per resident (for residential projects) and at or below the existing citywide work tour VMT per employee (for employment-generating projects). For regional-serving uses, the target is no increase in total study area VMT with the project, and for cumulative VMT analyses, when required, the target VMT threshold is that the project does not increase total boundary VMT per service population (all employees and residents) within Solano County.

Total Boundary VMT. All the VMT from all types of vehicles and for all trip purposes within a given boundary (such as Solano County).

Traffic Analysis Zone (TAZ). A geographic polygon somewhat similar to a Census block group that is used in a travel model to represent an area of relatively homogenous travel behavior.

Transit Priority Area (TPA). An area of close proximity to a significant transit mode, defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. Public Resources Code, § 21064.3 defines major transit stop as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of 15 minutes or less during the morning and afternoon peak commute periods. Public Resources Code § 21155 defines a 'high-quality transit corridor' as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. Currently, Benicia does not have any TPAs.

Transportation Demand Management (TDM). Strategies that are intended to reduce vehicular travel through programs and projects that maximize traveler choices through information, encouragement, and incentives geared toward modifying travel behavior and choices.

Truck Trips. Trips made by heavy vehicles. Per the OPR recommendations and their interpretation of Public Resources Code §15064.3, VMT analysis for transportation impact purposes can focus solely on automobile travel and can exclude truck trips. Truck trips are included in the analysis of other environmental topic areas, such as air quality, noise, and greenhouse gas.

Vehicle Miles Traveled (VMT). A metric that captures the total amount of vehicular travel by measuring the number of vehicle trips generated and the length or distance of those trips. For transportation impact analysis purposes, VMT is usually measured on a typical weekday, and can be expressed in several ways, such as total VMT, total VMT per service population (residents plus employees), home-based VMT per resident, and home-based work (or work tour) VMT per employee.

VMT Reduction Strategies. Strategies intended to reduce VMT, including TDM and physical design measures.

VMT Study Area. A geographic area over which the project's effect on total VMT will be evaluated. The study area should be defined such that it captures the reasonably foreseeable VMT changes associated with the project, but not so large that the effects of the project get swamped by broader economic and land use changes. In this document, project VMT is measured relative to the citywide average, except for regional-serving projects, which are measured relative to the countywide average; and the project's effect on cumulative VMT is measured by how it affects the countywide VMT (i.e., does the addition of the project increase countywide VMT per service population).

2. Project Screening

There are five screening criteria that can be applied to screen projects out of conducting a project-level VMT analysis. Even if a project satisfies one or more of the screening criteria, the City may still require a VMT analysis if there is evidence the project has characteristics that might lead to a significant VMT impact.

2.1: CEQA Exemption. Any project that is exempt from CEQA is not required to conduct a VMT analysis.

2.2: Small Projects. Small projects can be presumed to cause a less-than-significant VMT impact. Small projects are defined as having 10,000 square feet or less of non-residential space or 20 residential units or less, or otherwise generating less than 836 VMT per day.[3]

2.3: Local-Serving Uses. Projects that consist of Local-Serving Uses can generally be presumed to have a less-than-significant impact absent substantial evidence to the contrary, since these types of projects will primarily draw users and customers from a relatively small geographic area that will lead to short-distance trips and trips that are linked to other destinations.

2.4: Projects Located in Transit Priority Areas (TPAs). Projects located within a TPA can be presumed to have a less-than-significant impact absent substantial evidence to the contrary. This exemption would not apply if the project met any of the following criteria:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees than required by the lead agency (if the agency allows but does not require the project to supply a certain amount of parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (SCS) (as determined by the lead agency, with input from the Metropolitan Transportation Commission (MTC)); or
4. Results in a net reduction in multi-family housing units.

As noted previously, Benicia does not currently have any TPAs.

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[3] This threshold ties directly to the OPR Technical Advisory which notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Using statewide average data from the California Statewide Household Travel Survey (CHTS), the amount of daily VMT associated with 10,000 square feet of non-residential space is 836 VMT. Also using statewide average CHTS data, this level of VMT is associated with 20 housing units. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 20 housing units or 10,000 square feet of non-residential space could be considered not to lead to a significant impact.

2.5: Projects Located in Low VMT Areas. Residential and employment-generating projects located within a low VMT-generating area can be presumed to have a less-than-significant impact absent substantial evidence to the contrary.

A low VMT area is defined as follows:

- **For housing projects:** a TAZ that has existing home-based VMT per resident that is at or below the existing citywide average.
- **For employment-generating projects:** a TAZ that has existing work tour VMT per worker that is at or below the existing citywide average.

The existing (2015) VMT by TAZ maps in Appendix A show the VMT rates for each TAZ, based on the SNABM version available at the time these guidelines were finalized. At the time a project is evaluated, the analyst should check to determine if the Solano Transportation Authority has updated the SNABM, and if so new VMT by TAZ maps should be generated to facilitate this screening step. In addition, if a project is located in a TAZ with little or no similar uses (noted as cross-hatched in the Appendix A maps), the analyst may consider using the characteristics of adjacent TAZs, as well as other supporting information (see below), to support the potential screening under the low VMT area criteria.

As an alternative to the TAZ-based data—for either residential or employment generating projects—other substantial evidence may be presented to confirm the project is in a low-VMT area, subject to the review of the City. Such evidence may include market studies demonstrating the likely trip lengths for employees and customers of commercial projects; location-based service data (via a data vendor such as StreetLight) demonstrating the VMT characteristics of the project location and/or of similar project types; census data demonstrating the local travel modes and trip lengths near the project site; or other relevant data.

There is no definition of a low VMT area for Regional-Serving and Other Projects, since these projects always require a VMT analysis as described in Section 3 of this memo (unless they are screened out under Criteria 2.1 through 2.4).

Mixed-use projects may qualify for the use of this screening criterion if they include only housing, employment-generating uses and local-serving uses, and can reasonably be expected to generate VMT per resident and/or per worker that is similar to the existing land uses in the low VMT area, using relevant data and evidence as described above.

3. Projects Requiring VMT Analysis

A project not excluded from VMT analysis through the screening process described above should be subject to a VMT analysis to determine if it has a significant VMT impact.

Analysis Scenarios

The following scenarios should be addressed in the VMT analysis:

Project Analysis

- Baseline Conditions: The most current version of the baseline SNABM should be used to determine the baseline VMT for the TAZ in which the project is to occur.
- Baseline With Project Conditions: If the project is a simple, single-use project that is very similar to other developments that already exist in that TAZ, then the analyst may conclude that the project-generated home-based VMT per resident or the work tour VMT per employee will be the same as the existing VMT per resident or per employee in that TAZ; in that instance, a separate Baseline plus project model run would not be required. However, if the project contains one or more uses, or a mix of uses, or the use does not exist in the TAZ, then a model run is required. In this case, the proposed land use(s) should be added to the baseline condition for the relevant TAZ, or a separate TAZ should be created in the model to contain the project land uses. A full baseline with project model run should then be performed. The analyst should review the model output to confirm reasonableness of the results and to check production and attraction balancing to ensure the project's effect is being captured.

Cumulative Analysis (if Required)

- Cumulative No Project Conditions: The most current version of the future year SNABM should be used to run a Cumulative No Project scenario.
- Cumulative With Project Conditions: The project is added to the Cumulative No Project model, making adjustments to other city or regional land uses if appropriate, to reflect the fact that the project may represent development potential that would otherwise be distributed to other parts of Benicia or the county. This may be appropriate particularly if the proposed project is substantial in size such that it might change the distribution of future developments. This recognizes that individual land use projects will generally not change the regionwide totals for population and employment growth, but will influence localized land use and VMT impacts. If such adjustments are made, the typical process is to proportionally reduce similar land uses throughout the model based on the amount of use in each TAZ, commensurate with the amount of the use proposed by the project.

VMT Metrics and Significance Thresholds

The output from each model run will include home-based VMT per resident and/or work tour VMT per employee, depending on the project, which should be analyzed as described below. In addition, to calculate the total countywide VMT under cumulative conditions, the analyst would sum all the VMT occurring on all network links within the county, and calculate total VMT per service population.

The following describes the specific VMT metrics and significance thresholds that should be used in evaluating different project types:

Project (Baseline) Evaluation

Residential Projects should use the home-based VMT per resident metric to evaluate their project generated VMT. The project generated home-based VMT per resident constitutes a significant impact if it is higher than the citywide average home-based VMT per resident.

Employment-Generating Projects should use the work tour VMT per employee metric for their project generated VMT estimates. The project generated work tour VMT per employee constitutes a significant impact if it is higher than the citywide average work tour VMT per employee.

Regional-Serving Projects should use the metric of total study area VMT and should define a VMT study area over which to evaluate that metric; this may be Solano County, the entire nine-county Bay Area, or a differently-defined region as appropriate to the project characteristics. The project would have a significant impact if the project increases total VMT within the study area relative to the No Project case. Note that the modeling for such projects should account for re-balancing of trip productions and attractions within the study area as a result of the addition of the Project.

Other Uses and Projects need to be analyzed using a methodology developed by the City of Benicia specifically for the project, prepared and documented based on available data and taking into account the specific methodologies and thresholds identified in this document.

Mixed-Use Projects may be analyzed using a combination of techniques described above, as follows:

- Mixed use projects that contain a combination of housing, employment-generating and regional-serving uses may choose to evaluate each use separately using the metrics and significance thresholds described above for those uses. Or, the analysis could be based on a combined VMT per service population metric, if this is determined to be more appropriate for the project.
- Mixed use projects that include a local-serving component may ignore that component for analysis purposes, and analyze only the remaining uses. Note that it may be more

beneficial to the project to conduct a full analysis that takes account of on-site local-serving uses, since a full analysis can take credit for reductions in trips resulting from the on-site mix.

In all cases, the analyst should consider whether that approach will effectively capture the likely interactions between the different uses. Other analytical options that would capture interactions between different uses are to analyze the project by conducting a full run of the SNABM, or to use a sketch planning tool designed to estimate the trip generation effects of a mixed-use project.

Cumulative Evaluation

If required, the cumulative analysis should measure the project's performance under future cumulative conditions relative to the appropriate *baseline* VMT metric (as described above); this will capture whether future project performance may improve over baseline performance, due to expected changes in the land use and transportation context which would in turn affect project trip characteristics.

The second metric for cumulative impact analysis is whether the total countywide VMT per service population increases due to the project. This measures the *project's effect on regional VMT*, as opposed to the *project-generated VMT* which is addressed by the other metrics above. If the project does not increase countywide VMT per service population, the impact would be less than significant.

4. VMT Mitigation

If the conclusion is that the project would have the potential to cause a significant VMT impact per one or more of the significance thresholds defined above, then mitigation is required. CEQA requires all feasible measures be implemented to reduce identified impacts to less-than-significant levels.

Method of Calculating Mitigation Reductions

The analyst, working with the lead agency and applicant, shall specify a series of mitigation measures, each of which shall have a specific percent level of VMT reduction assigned to it. Each reduction shall be applied to the overall VMT associated with the project, until the total VMT is reduced to a less-than-significant level or all feasible mitigation reductions have been applied.

Required Levels of Mitigation

In order to reduce impacts to less-than-significant levels, the proposed mitigation measures must reduce VMT to the relevant threshold as defined in Section 3 above.

Types of Mitigation

To mitigate VMT impacts, the following actions could be taken:

- Modify the project's characteristics to reduce VMT generated by the project. This might involve changing the density or mixture of land uses on the project site, or changing the project's location to one that is more accessible by transit or other travel modes. The effectiveness of such changes should be modeled using the analysis techniques described in Section 3, above.
- Implement transportation demand management (TDM) or physical design measures to reduce VMT generated by the project. The full range of travel demand management measures analyzed by CAPCOA are listed in **Appendix B**, and reduction levels can be calculated using the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers*, CAPCOA, December 2021 (CAPCOA Handbook), or from other defensible sources. See further discussion below about the application of the CAPCOA Handbook analysis methods.
- Participate in a VMT impact fee program and/or VMT mitigation exchange or banking program. Currently there are no fee programs, banks, or exchanges that Benicia development could participate in, but if future programs are developed this would be a new mitigation option.

VMT Reductions from TDM and Physical Design Measures

TDM and physical design measures that could potentially be applicable in Benicia are summarized in **Appendix B**. It should be noted that the understanding of the availability, applicability, and effectiveness of VMT mitigation measures is continuing to evolve, and the evaluation of TDM measures should be updated periodically. Any evaluation of the effectiveness of VMT reduction measures should recognize that many TDM strategies are dependent on things that are likely to change over time, such as the level of priority a building tenant places on achieving trip reductions, or the frequency of nearby transit services. As such, actual real-time VMT reduction cannot be reliably predicted, and ongoing monitoring should be considered to ensure that mitigation expectations are being met.

The effectiveness of each strategy shown in **Appendix B** will vary depending on the context in which it is implemented and the types of trips to which it applies. It is the analyst's responsibility to review the available research and suggest a level of VMT reduction that is reasonable to apply to the project being studied, taking into account the project's specific characteristics and the context in which it would be constructed.

It should also be noted that the incremental benefit of each VMT reduction strategy will diminish as strategies are combined together. Therefore, the analyst should carefully document how the interaction between TDM strategies is accounted for. The CAPCOA Handbook provides detailed guidance on estimating the VMT reduction effectiveness of individual measures and combinations of measures.

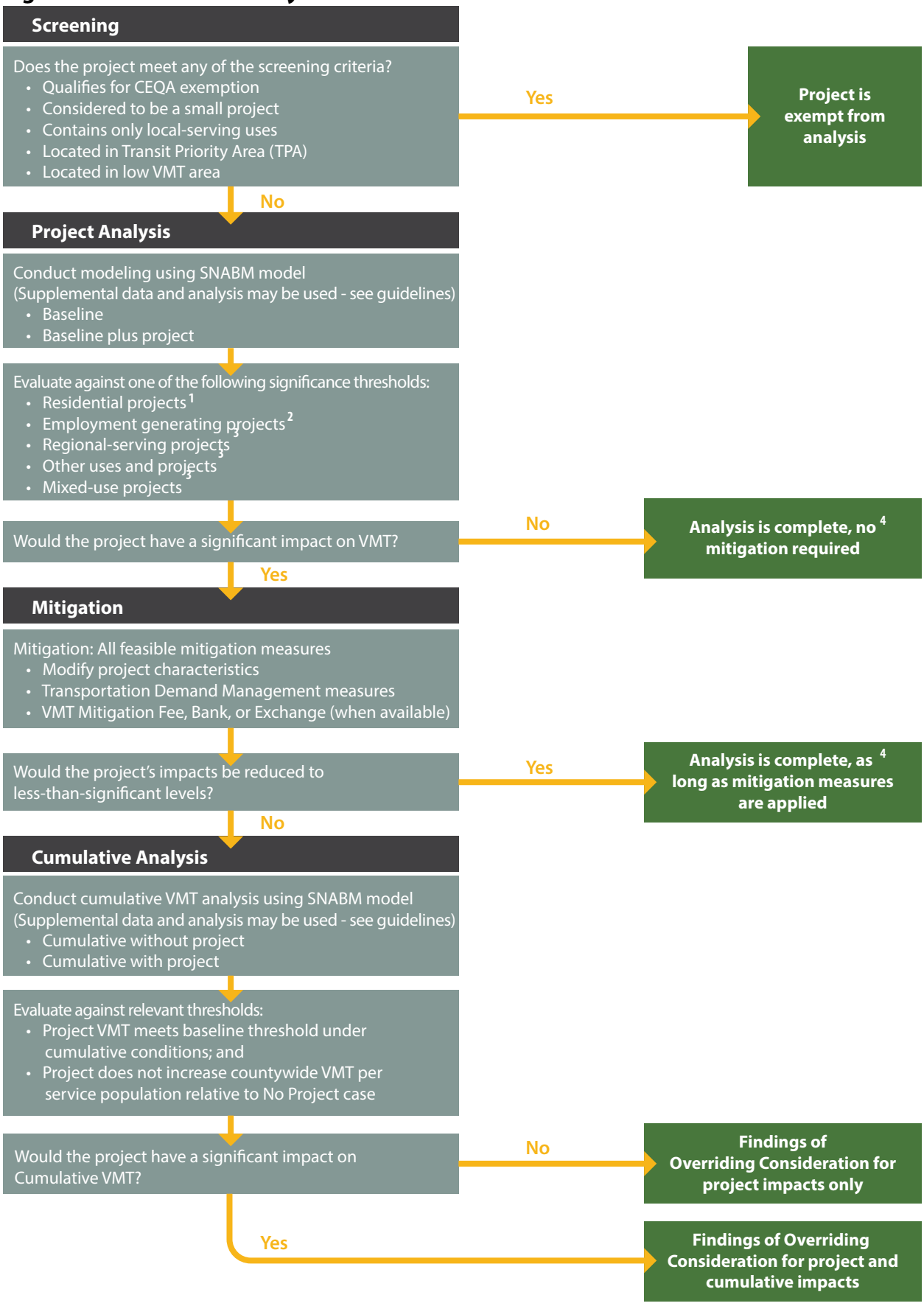
5. Impact Findings and Findings of Overriding Consideration

If the analysis includes all feasible measures described in Section 4 above and those measures are not sufficient to fully mitigate the impact, then the VMT impact will be classified as significant and unavoidable. This may include a finding relative to project impacts, cumulative impacts, or both. The City of Benicia may still approve the project, as allowed by CEQA, by making a finding of overriding considerations.

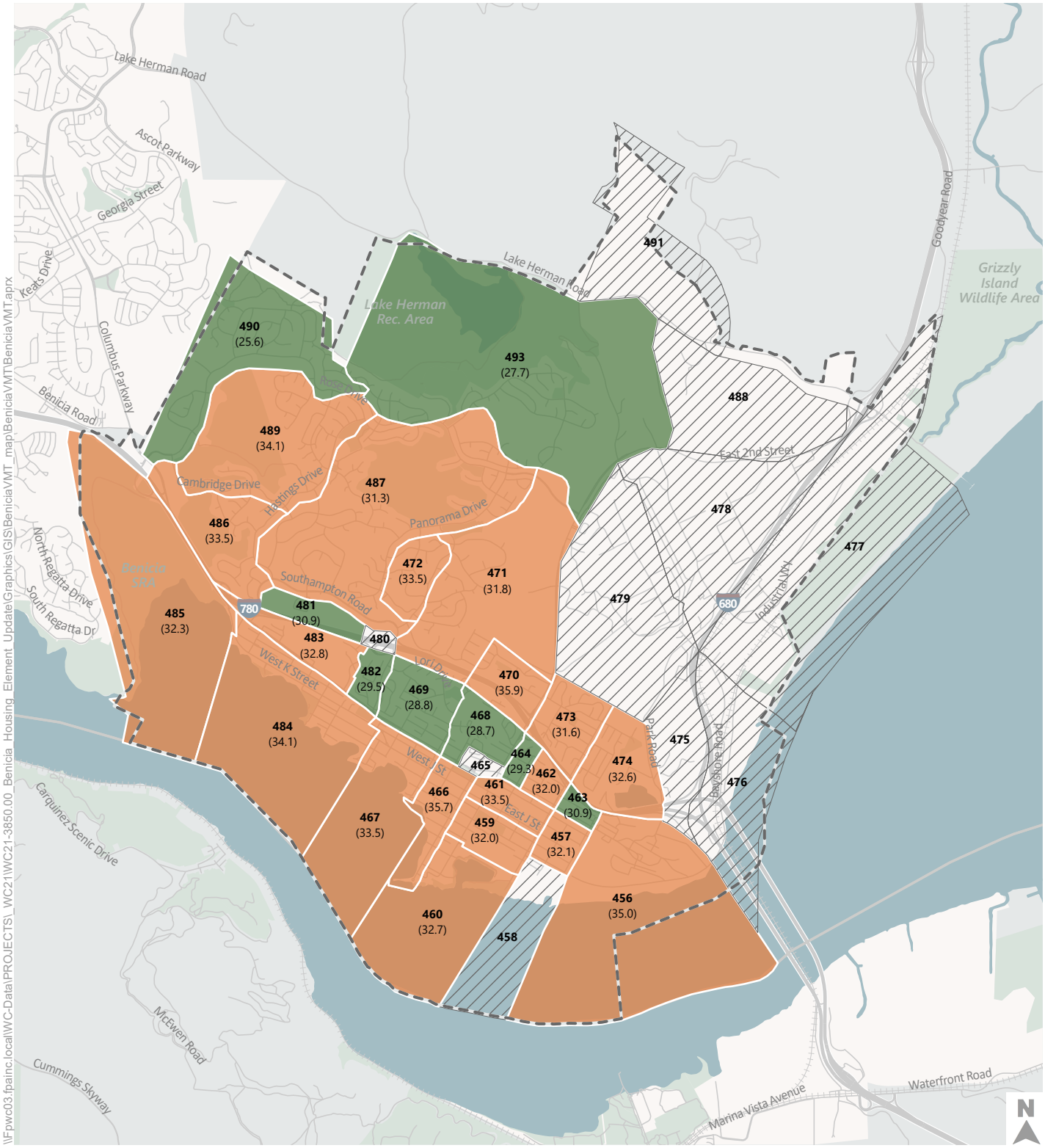
Attachments:

Figure 1 – VMT Analysis Flowchart
Appendix A – VMT Maps
Appendix B – VMT Reduction Measures

Figure 1: Benicia VMT Analysis Process



1. Threshold for residential projects: Home-based VMT per resident is at or below citywide average
2. Threshold for employment projects: Work tour VMT per employee is at or below citywide average
3. See guidelines for more information
4. Note that it may be appropriate to conduct cumulative analysis for certain plans or long-term build-out projects, even if the Project impact is less than significant



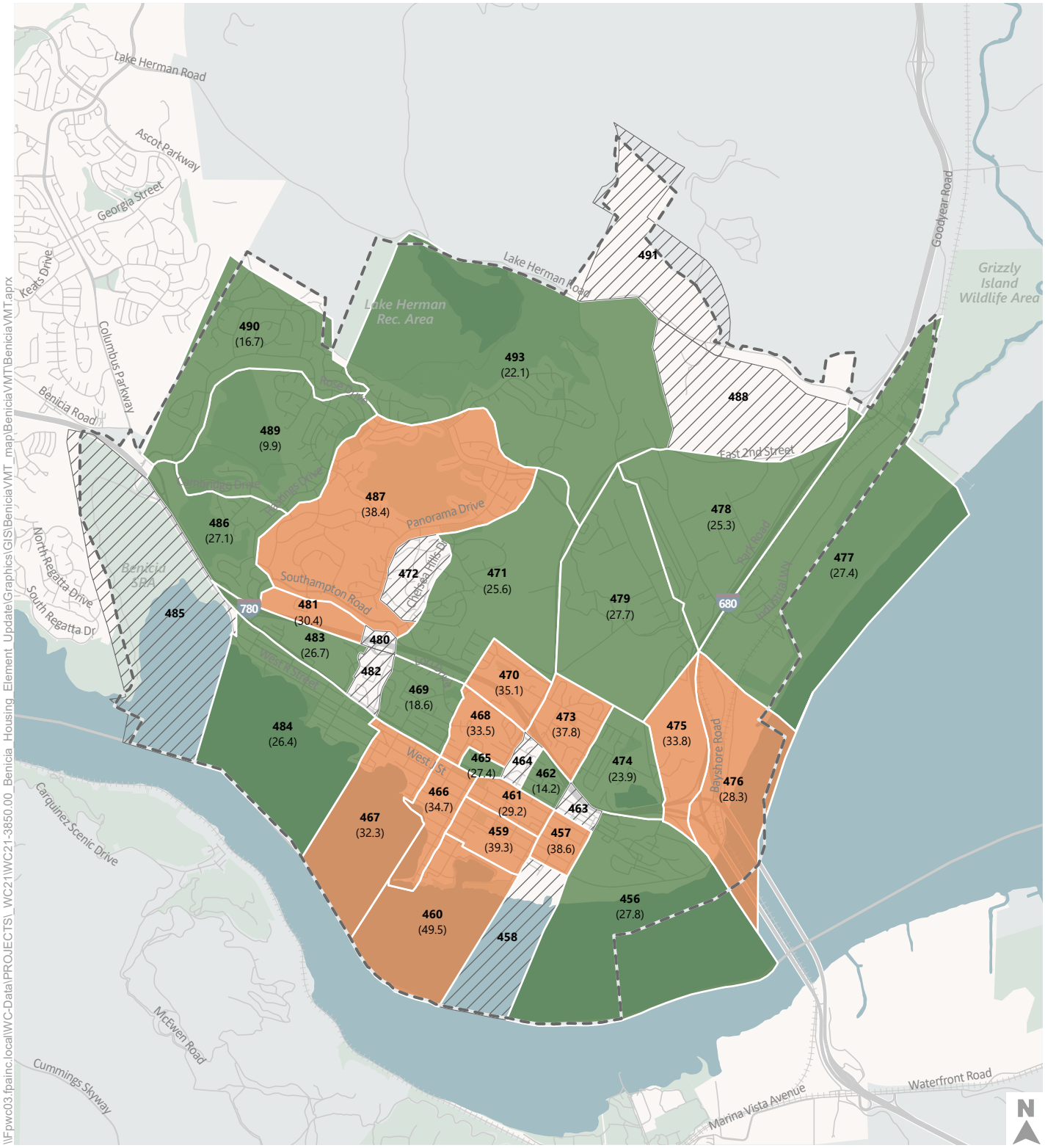
Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2021)

Citywide Average Residential VMT Per Resident: 30.9

- At or below Benicia City average
- Above Benicia City average
- TAZ with population below threshold
- ### TAZ ID
- (xx.x) Residential VMT Per Resident
- City Boundary

Figure A-3

2040 Residential VMT Per Resident Compared to Citywide Average SNABM Model



Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2021)

Citywide Average Work Tour VMT Per Employee: 27.8

- At or below Benicia City average
- Above Benicia City average
- TAZ with employment below threshold
- ### TAZ ID
- (xx.x) Work Tour VMT Per Employee
- City Boundary

Figure A-4

2040 Work Tour VMT Per Employee Compared to Citywide Average SNABM Model

Appendix B: VMT Reducing Measures (CAPCOA 2021)

Note: the maximum reductions noted in the table below encompass the full range of land use and transportation contexts and would not apply to suburban contexts such as Benicia. Incorporating the limitations of a suburban, non-transit rich environment, the following maximum effectiveness for any combination of measures is approximately as follows:

Residential VMT: 15% maximum reduction

Employment VMT: 21% maximum reduction

Citywide VMT: 13% maximum reduction

The CAPCOA Handbook (pages 70 – 202) provides detailed guidance on how to estimate the VMT reduction effectiveness of the measures below, including effectiveness of combinations of measures.

ID	Travel Demand Management Measure	Measure Category	Types of Trips / VMT Reduced	Maximum Potential Reduction
T-1	Increase Residential Density	Land Use	Project-generated trips	30%
T-2	Increase Job Density	Land Use	Project-generated trips	30%
T-3	Provide Transit-Oriented Development	Land Use	Project-generated trips	31%
T-4	Integrate Affordable and Below Market Rate Housing	Land Use	Project-generated trips	29%
T-17	Improve Street Connectivity	Land Use	All neighborhood/city trips	30%
		Land Use	***Maximum Category Reduction***	***65%***
T-5	Implement Commute Trip Reduction Program (Voluntary)	Trip Reduction Programs	Employee commute trips	4%
T-6	"Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)"	Trip Reduction Programs	Employee commute trips	26%
T-7	Implement Commute Trip Reduction Marketing	Trip Reduction Programs	Employee commute trips	4%
T-8	Provide Ridesharing Program	Trip Reduction Programs	Employee commute trips	8%
T-9	Implement Subsidized or Discounted Transit Program	Trip Reduction Programs	Employee commute trips	5.5%
T-10	Provide End-of-Trip Bicycle Facilities	Trip Reduction Programs	Employee commute trips	4.4%
T-11	Provide Employer-Sponsored Van pool	Trip Reduction Programs	Employee commute trips	8.1%
T-12	Price Workplace Parking	Trip Reduction Programs	Employee commute trips	20%
T-13	Implement Employee Parking Cash-Out	Trip Reduction Programs	Employee commute trips	12%

ID	Travel Demand Management Measure	Measure Category	Types of Trips / VMT Reduced	Maximum Potential Reduction
T-23	Community-Based Travel Planning[1]	Trip Reduction Programs	Household trips	2.3%
		Trip Reduction Programs	***Maximum Category Reduction***	***45%***
T-15	Limit Residential Parking Supply[2]	Parking or Road Pricing/Management	Project-generated trips	13.7%
T-16	Unbundle Residential Parking Costs from Property Cost	Parking or Road Pricing/Management	Project-generated trips	15.7%
		Parking or Road Pricing/Management	***Maximum Category Reduction***	***29%***
T-18	Provide Pedestrian Network Improvements	Neighborhood Design	Household trips	6.4%
T-19-A	Construct or Improve Bike Facility	Neighborhood Design	All neighborhood/city trips	0.8%
T-19-B	Construct or Improve Bike Boulevard	Neighborhood Design	All neighborhood/city trips	0.2%
T-20	Expand Bikeway Network	Neighborhood Design	Commute Trips	0.5%
T-21-A	Implement Conventional Carshare Program	Neighborhood Design	All neighborhood/city trips	0.2%
T-22-A	Implement Pedal (Non-Electric) Bikeshare Program	Neighborhood Design	All neighborhood/city trips	0.02%
T-22-B	Implement Electric Bikeshare Programs	Neighborhood Design	All neighborhood/city trips	0.1%
T-22-C	Implement Scootershare Program	Neighborhood Design	All neighborhood/city trips	0.1%
		Neighborhood Design	***Maximum Category Reduction***	***10%***
T-24	Implement Market Price Public Parking (On-Street)[3]	Parking or Road Pricing/Management	All neighborhood/city trips	30%
T-25	Extend Transit Network Coverage or Hours	Transit	All neighborhood/city trips	4.6%
T-26	Increase Transit Service Frequency	Transit	All neighborhood/city trips	11.3%
T-27	Implement Transit-Supportive Roadway Treatments	Transit	All neighborhood/city trips	0.6%
T-28	Provide Bus Rapid Transit	Transit	All neighborhood/city trips	13.8%
T-29	Reduce Transit Fares	Transit	All neighborhood/city trips	1.2%
		Transit	***Maximum Category Reduction***	***15%***

1. Community-Based Travel Planning is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single-occupancy vehicles.
2. Note this measure is ineffective in locations where unrestricted street parking or other offsite parking is available nearby and has adequate capacity to accommodate project-related vehicle parking demand.
3. Applicable to central business districts, employment centers, and retail centers.

Source: *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers,* CAPCOA, December 2021