

## 4.12 TRANSPORTATION

This section identifies transportation conditions (i.e., roadway circulation, bicycle and pedestrian circulation) at the project site and in the surrounding area and evaluates the potential impacts pertaining to transportation conditions due to project implementation. Information in this section is based on the *Green Valley III Residential Project – CEQA Assessment (VMT Memo)*<sup>1</sup> prepared by Fehr & Peers dated October 19, 2022, which is included in **Appendix J** of this Draft EIR.

Up until July 1, 2020, roadway congestion or Level of Service (LOS) was used as the primary metric for planning and environmental review purposes. However, Senate Bill (SB) 743 required the Governor’s Office of Planning and Research (OPR) to establish a new metric for identifying and mitigating transportation impacts under the California Environmental Quality Act (CEQA) in an effort to meet the State’s goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. CEQA Section 21099(b)(2) states that, upon certification of the revised guidelines for determining transportation impacts pursuant to CEQA Section 21099(b)(1), automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. OPR identified Vehicle Miles Traveled (VMT) as the required CEQA transportation metric for determining potentially significant impacts.<sup>2</sup> In December 2018, the California Natural Resources Agency certified and adopted the *State CEQA Guidelines* update package, including the section implementing SB 743 (*State CEQA Guidelines* Section 15064.3). OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which contains OPR’s technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.<sup>3</sup> As of July 1, 2020, VMT (not LOS) is the only legally acceptable metric for the evaluation of transportation-related environmental impacts pursuant to CEQA.

In accordance with SB 743, this EIR uses VMT to analyze and evaluate the significance of the project’s transportation impacts.

### 4.12.1 Environmental Setting

This section describes the existing transportation conditions, including the roadway network, bicycle facilities, pedestrian facilities, and transit service within approximately 1.5 miles of the project site. The applicable regulatory framework is also described.

#### 4.12.1.1 Existing Transportation and Circulation System

**Pedestrian Facilities.** Pedestrian facilities comprise sidewalks, off-street pathways, marked and enhanced crosswalks (mid-block and at intersections), curb ramps, median refuges, and pedestrian-scale lighting. Sidewalks are provided along both sides of all roadways around the project site, with marked crosswalks and curb ramps at all intersections. Pedestrian signals with pedestrian-activated

<sup>1</sup> Fehr & Peers. 2022. *Green Valley III Residential Project – CEQA Assessment*. October 19.

<sup>2</sup> Governor’s Office of Planning and Research (OPR). 2016. *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)*. January 20.

<sup>3</sup> OPR. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 18. Website: [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf) (accessed April 26, 2022).

push buttons are provided at signalized intersections. Medians are often present, but median refuge islands are only provided for pedestrians crossing Business Center Drive.

**Bicycle Facilities.** Bikeway planning and design in California typically relies on guidelines and design standards established by California Department of Transportation (Caltrans) in the Highway Design Manual (Chapter 1000: Bikeway Planning and Design). The Caltrans guidelines cover four primary types of bikeway facilities: Class I, Class II, Class III, and Class IV. These facility types are described below.

- **Class I Bikeways** (Bike Paths) provide a completely separate right-of-way, are designated for the exclusive use by bicycles and pedestrians, and minimize vehicle and pedestrian cross-flow. In general, bike paths serve corridors that are not served by existing streets and highways, or where sufficient right-of-way exists for such facilities to be constructed.
- **Class II Bikeways** (Bike Lanes) are lanes for bicyclists generally adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are generally 5 feet wide. Adjacent vehicle parking and vehicle/pedestrian cross-flow are permitted. Note that when grade separation or buffers are constructed between the bicycle and vehicle lanes, these facilities are classified as Class IV Separate Bikeways.
- **Class III Bikeways** (Bicycle Routes/Bicycle Boulevards) are designated by signs or pavement markings for shared use with pedestrians or motor vehicles but have no separated bicycle right-of-way or lane striping. Bicycle routes serve either to (a) provide continuity to other bicycle facilities or (b) designate preferred routes through high-demand corridors. Bicycle routes are implemented on low-speed (less than 25 mile-per-hour) and low-volume (fewer than 3,000 vehicles/day) streets.
- **Class IV Bikeways**, also known as “cycle tracks” or “protected bike lanes,” provide a right-of-way designated exclusively for bicycle travel within a roadway and which are protected from other vehicle traffic with devices, including, but not limited to, grade separation, flexible posts, inflexible physical barriers, or parked cars.

Class II bike lanes along Green Valley Road and Business Center Drive provide direct access to the project site. An existing Class I shared-use path, the Fairfield Linear Park Trail, is located approximately 0.8 miles east of the project site. Class II bike lanes are also provided along Mangels Boulevard from Westamerica Drive to Vintage Valley Drive and along Suisun Valley Road from Business Center Drive to Solano College Road/Oakwood Drive.

Bicycle facilities are ranked based on their “Level of Traffic Stress” which is a measurement of bicycling comfort based on roadway characteristics. Low stress bikeways are comfortable for everyone to ride on, including people who would be categorized as “interested, but concerned.” In contrast, high stress bikeways are only tolerated by a few, primarily those who could be described as “strong and fearless” – those comfortable riding under any conditions (about 7 percent of the population). Class II or Class III bicycle facilities on roadways with multiple lanes of vehicle traffic and speed limits above 25 miles per hour would be categorized as high-stress bikeways.

All bicycle facilities adjacent to the project site would be categorized as high stress. As such, it would be unlikely that any but the most confident and fearless bicyclists would feel comfortable bicycling to and from the project site.

**Transit Services and Facilities.** Transit service in the vicinity of the project site is provided by Fairfield and Suisun Transit (FAST), which provides local bus service, and Solano County Transit (SolTrans), which provides regional bus service. Transit service provided by both of these agencies in the project area is described below in **Table 4.12.A: Existing Transit Service**.

**Table 4.12.A: Existing Transit Service**

| Service Provider | Route   | Operating Days               | Operating Hours                                    | Approximate Headway   | Closest Transit Stop                     |
|------------------|---------|------------------------------|--|-----------------------|--|
| FAST             | Route 7 | Monday to Friday<br>Saturday | 6:00 a.m. to 6:55 p.m.<br>10:00 a.m. to 3:55 p.m.  | 60 minutes            | Fairfield Cordelia Library               |
|                  | Route 8 | Monday to Friday<br>Saturday | 6:30 a.m. to 6:55 p.m.<br>9:55 a.m. to 4:20 p.m.   | 60 minutes            | Fairfield Cordelia Library               |
| SolTrans         | Route R | Monday to Friday<br>Saturday | 4:30 a.m. to 12:00 a.m.<br>7:00 a.m. to 10:00 p.m. | 60 minutes<br>2 hours | Suisun Valley Road/<br>Westamerica Drive |

Source: Fehr & Peers (2022).

FAST = Fairfield and Suisun Transit

SolTrans = Solano County Transit

FAST operates Routes 7 and 8 in the vicinity of the project site. Route 7 is a local serving route connecting the project site to the Fairfield Transportation Center and the SolTrans express intercity Blue and Green lines. Route 8 is also a local serving route, connecting the project site to the communities west of Interstate 680 (I-680). Route R, which is operated by SolTrans, is a regional route that connects the cities of Fairfield and Vallejo and the El Cerrito del Norte Bay Area Rapid Transit (BART) station.

**Roadway Network.** Regional highways, arterials, major collectors, collectors, and local streets run throughout the study area. Regional access to the project site is provided via Interstates 680 and 80 (I-680 and I-80, respectively) and State Route 12 (SR 12). Descriptions of roadways in the study area are provided below using roadway classifications defined in the Fairfield General Plan Circulation Element.<sup>4</sup>

- **I-80** is an east-west, 12-lane freeway extending from San Francisco to the California-Nevada state line via Vallejo, Fairfield, and Sacramento. I-80 connects the project site to the center of Fairfield and the San Francisco Bay Area and Sacramento metropolitan areas. Connections to the project site are made through interchanges at Green Valley Road and at Suisun Valley-Pittman Road. I-80 is multiplexed with SR 12 near the project site.<sup>5</sup>
- **I-680** is a north-south, four-lane freeway extending from Fairfield to San Jose via Benicia, Walnut Creek, and Fremont. I-680 connects the project site to the outer East San Francisco Bay Area

<sup>4</sup> Fairfield, City of. 2002. *City of Fairfield General Plan*, Circulation Element.

<sup>5</sup> Multiplex refers to one physical roadway bearing two or more different route numbers.

with further connections to Silicon Valley. Connections to the project site are made through interchanges at Cordelia Road and Suisun Valley Road-Pittman Road via I-80.

- **SR 12** is an east-west, four-lane expressway extending from Sebastopol to San Andreas via Santa Rosa, Napa, Fairfield, and Lodi. SR 12 connects the project site to the counties of Sonoma, Napa, and San Joaquin. As described above, SR 12 is multiplexed with I-80 near the project site and has the same connections to the project site.
- **Green Valley Road** is a north-south, four-lane divided arterial extending from the I-80/Green Valley Road interchange in the south to the Green Valley Country Club area in the north. Green Valley Road transitions onto Lopes Road south of the I-80 interchange, which continues towards Red Top Road and Benicia. The I-80/Green Valley Road interchange is being modified as part of the I-80/I-680/SR 12 Interchange Improvement Project. As described below, the primary change along Green Valley Road is the construction of a direct westbound I-80 off-ramp to Green Valley Road. Green Valley Road has a speed limit of 45 miles per hour and does not include any on-street parking. Class II bike lanes are provided along both sides of Green Valley Road between the I-80/Green Valley Road interchange and Eastridge Drive. The average daily traffic (ADT) on Green Valley Road in the vicinity of Business Center Drive is approximately 23,100 vehicles per day.
- **Business Center Drive** is an east-west, four-lane divided arterial roadway that currently runs from Mangels Boulevard in the west to Suisun Creek in the east; east of Suisun Creek, Business Center Drive transitions onto Suisun Parkway, which terminates at the I-80/Suisun Parkway-Chadbourne Road interchange. The posted speed limit near the project site is 40 miles per hour, and parking is prohibited along the roadway. The ADT in the vicinity of the project site is about 12,100 vehicles per day. Class II bike lanes are provided along both sides of Business Center Drive in the vicinity of the project site. The I-80/I-680/SR 12 interchange improvement project (detailed below) includes a further extension of Business Center Drive to a new SR 12/ Red Top Road interchange; this extension is expected to be completed in the Year 2035 time horizon.
- **Neitzel Road** is a two-lane, one-way arterial roadway that extends from the I-80/Suisun Valley Road-Pittman Road interchange in the east to Business Center Drive in the west. The roadway serves as the connection between westbound I-80 and Green Valley Road as the I-80 Green Valley Road interchange does not include a direct off-ramp to Green Valley Road. Likewise, since a direct on-ramp to westbound I-80 is not provided at the I-80/Suisun Valley Road-Pittman Road interchange, Neitzel Road conveys traffic to the westbound I-80 on-ramp at Green Valley Road. Neitzel Road is anticipated to be abandoned and removed as part of the I-80/I-680/SR 12 interchange improvement project. The posted speed limit near the interchange is 50 miles per hour, and parking is prohibited on both sides of the roadway.
- **Mangels Boulevard** is an east-west, four-lane divided arterial extending from the intersection of Antiquity Drive and Business Center Drive in the west, to Westamerica Drive in the east. West of Vintage Valley Drive, the width of the roadway is reduced to two lanes in each direction with a wide median. The speed limit along Mangels Boulevard is posted at 40 miles per hour, and no parking is allowed on this facility.

- **Lopes Road** is a north-south, two-to-four-lane arterial extending from the I-80/Green Valley Road interchange in the north to the City of Benicia in the south. The roadway connects the project area (via Green Valley Road and Business Center Drive) to industrial and residential areas along the west side of I-680. The posted speed limit in the project study area is 40 miles per hour. The ADT on this roadway south of the I-80 on- and off-ramps is about 14,300 vehicles per day.
- **Suisun Valley Road** is a two-to-six-lane arterial roadway that extends from the Wooden Valley area of Napa County in the north to the I-80/Suisun Valley Road-Pittman Road interchange in the south. Suisun Valley Road transitions onto Pittman Road at the interchange. The interchange is expected to be modified as part of the I-80/I-680/SR 12 interchange improvement project; a direct westbound I-80 on ramp will be provided as part of the removal of the Neitzel Road connection to Green Valley Road. Near the project site, the posted speed limit is 40 miles per hour, and parking is prohibited on both sides of the roadway. The ADT on this roadway south of Business Center Drive is about 11,700 vehicles per day.

**I-80/I-680/SR 12 Interchange Project.** The proposed I-80/I-680/SR 12 interchange project would substantially alter the travel patterns in the vicinity of the project site. The interchange project is comprised of seven construction packages; Package 1 was completed and opened to traffic in 2017 and Package 2A is currently under construction and anticipated to be open to traffic in fall 2022. In general, Packages 1 through 7 of the interchange project include:

- **Package 1:** I-80/Green Valley Road interchange improvements, ramp braiding between the westbound I-80 on-ramp from Green Valley Road and the westbound I-80 to westbound SR 12 connector (completed in 2017);
- **Package 2A:** Upgrade of eastbound SR 12 to eastbound I-80 connector (currently under construction; anticipated to open in fall 2022);<sup>6</sup>
- **Package 2B:** Construction of new I-680/Red Top Road interchange;
- **Package 3:** Realignment of westbound I-80 to southbound I-680 connector, new westbound I-80 on-ramp at Suisun Valley Road, new westbound I-80 off-ramp at Green Valley Road, and removal of Neitzel Road;
- **Package 4:** Realignment of northbound I-680 to eastbound I-80 connector;
- **Package 5:** Reconstruction of I-80/Red Top Road interchange, realignment of Red Top Road to a new SR 12/Red Top Road interchange, and an extension of Business Center Drive west to the new SR 12/Red Top Road interchange;
- **Package 6:** Construction of a high-occupancy vehicle (HOV) lane and connector between I-680 and the eastern leg of I-80;

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<sup>6</sup> Package 2 was split into 2A and 2B in June 2017 in order to pursue separate funding opportunities.

- **Package 7:** Construction of three connectors: (1) from eastbound I-80 to southbound I-680; (2) from northbound I-680 to westbound I-80; and (3) from westbound SR 12 to southbound I-680. Construction of the second connector will require replacement of the Union Pacific Railroad (UPRR) Cordelia Underpass, including new track.

#### 4.12.2 Regulatory Setting

The following discusses applicable standards and policies related to transportation, including those from state, regional, and local agencies. There are no federal standards related to transportation that are applicable to the proposed project.

##### 4.12.2.1 State Regulations

This section summarizes applicable State regulations guiding transportation planning in Fairfield.

**California Department of Transportation.** Caltrans is responsible for the maintenance and operation of State routes and highways. In Fairfield, Caltrans facilities include I-80, I-680, and SR 12. Caltrans maintains a volume monitoring program and reviews local agencies planning documents (such as this EIR) to assist in its forecasting of future volumes and congestion points. The Guide for the Preparation of Traffic Impacts Studies published by Caltrans is intended to provide a consistent basis for evaluating traffic impacts to State facilities. The City recognizes that “Caltrans endeavors to maintain a target level of service at the transition between LOS C and LOS D on State highway facilities”; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target level of service. Caltrans states that, for existing State highway facilities operating at less than the target LOS, the existing LOS should be maintained.

Caltrans released a *VMT-Focused Transportation Impact Study Guide* (May 20, 2020) that recommends use of the OPR recommendations for land use projects and plans. For transportation projects, Caltrans has suggested that any increase in VMT would constitute a significant impact for transportation projects. This has been referred to as the “Net Zero VMT threshold.”

**Senate Bill 375.** As a means to achieve the Statewide emission reduction goals set by Assembly Bill 32 (“The California Global Warming Solutions Act of 2006”), SB 375 (“The Sustainable Communities and Climate Protection Act of 2008”) directs the CARB to set regional targets for reducing GHG emissions from cars and light trucks. Using the template provided by the State’s Regional Blueprint program to accomplish this goal, SB 375 seeks to align transportation and land use planning to reduce VMT through modified land use patterns. There are five basic directives of the bill: (1) creation of regional targets for GHG emissions reduction tied to land use, (2) a requirement that regional planning agencies create a sustainable communities strategy (SCS) to meet those targets (or an Alternative Planning Strategy if the strategies in the SCS would not reach the target set by the CARB), (3) a requirement that regional transportation funding decisions be consistent with the SCS, (4) a requirement that the Regional Housing Needs Allocation numbers for municipal general plan housing element updates must conform to the SCS, and (5) CEQA exemptions and streamlining for projects that conform to the SCS. The implementation mechanism for SB 375 that applies to land use in Fairfield is *Plan Bay Area 2050*.

**Senate Bill 743.** SB 743 was signed into law in 2013 and fundamentally changed the way transportation impacts are analyzed under CEQA. It required the OPR to “prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the [CEQA] guidelines ...establishing criteria for determining the significance of transportation impacts of projects” to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.”

On December 28, 2018, the Natural Resources Agency adopted *State CEQA Guidelines* Section 15064.3, which establishes specific criteria for evaluating a project’s transportation impacts and states that “vehicle miles traveled is the most appropriate measure of transportation impacts.” It gives agencies the “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” provided that “[a]ny assumptions used to estimate vehicle miles traveled... should be documented and explained in the environmental document prepared for the project.” Section 15064.3 further states that except for certain transportation projects, “a project’s effect on automobile delay shall not constitute a significant environmental impact.” See *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal. App. 5th 609, 626 (holding that a general plan’s impact on LOS, which effectively measures automobile delay, can no longer constitute a significant environmental impact).

Additionally, OPR issued a technical advisory memorandum in December 2018 that includes general guidance and information for lead agencies to use in implementing SB 743, including choosing VMT methodology and establishing VMT thresholds. The City of Fairfield formally adopted locally applicable VMT metrics, methodology, and significance criteria in December 2020, as discussed in **Section 4.12.3**, below.

#### 4.12.2.2 Regional Plans and Regulations

This section summarizes applicable regional plans and regulations guiding transportation planning in Fairfield.

**Metropolitan Transportation Commission.** The Metropolitan Transportation Commission (MTC) is responsible for planning, coordinating, and financing transportation projects in the nine-county San Francisco Bay Area. The local agencies that comprise these nine counties help the MTC prioritize projects based on need, feasibility, and conformance with federal and local transportation policies. In addition to coordinating with local agencies, the MTC distributes State and federal funding through the Regional Transportation Improvement Program.

**Plan Bay Area.** *Plan Bay Area 2050* is a State-mandated, integrated long-range transportation and land use plan. As required by SB 375, all metropolitan regions in California must complete an SCS as part of a Regional Transportation Plan. This strategy integrates transportation, land use and housing to meet greenhouse gas reduction targets set by the CARB. The plan meets those requirements. In addition, the plan sets a roadmap for future transportation investments and identifies what it would take to accommodate expected growth. The plan neither funds specific transportation projects nor changes local land use policies.

The MTC and the Association of Bay Area Governments adopted *Plan Bay Area 2050* in October 2021. To meet the GHG reduction targets, the plan identifies four Growth Geographies where future growth in housing and jobs should be focused: priority development areas (PDAs), priority production areas (PPAs), transit-rich areas (TRAs), and high-resource areas (HRAs). The agencies estimate more than 80 percent of housing growth would occur within TRAs and nearly 30 percent would be within HRAs, and more than 60 percent of job growth would be within walking distance of high-quality transit between 2015 and 2050.<sup>7</sup> The project site is not within a Growth Geography.

**Solano Transportation Authority Congestion Management Program.** The purpose of the Congestion Management Plan (CMP) is to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide transportation solutions. To monitor attainment of the CMP, the Solano Transportation Authority (STA) adopted the roadway LOS standards. The LOS standards established for Solano County vary by roadway segments and conform to current land use plans and development differences among the coast, bayside, older downtowns, and other areas of Solano County. STA has a countywide threshold of 100 added peak-hour trips when determining if any CMP roadway facilities should be included as part of the traffic impact assessment prepared for a proposed project.

#### 4.12.2.3 Local Plans and Regulations

This section summarizes applicable City's plans and regulations guiding transportation planning in Fairfield.

**City of Fairfield General Plan.** The following policies of the *City of Fairfield General Plan* pertaining to transportation would be applicable to the proposed project:

- **Objective CI 1:** Establish a circulation system that is consistent with the land use patterns of the City.
  - **Policy CI 1.1:** The City's network of roads, local streets, sidewalks, bicycle routes, and multiuse pathways shall be compatible with the general land use patterns of the City. The circulation system in infill development areas and Priority Development Areas shall facilitate and complement infill development.
  - **Policy CI 1.2:** The City's mix of land uses, development patterns, and densities shall be conducive to alternative modes of transportation, such as walking, transit, paratransit and bicycles. Pedestrian travel shall be encouraged through the location of employment centers and commercial development within close proximity of residential areas. In particular, new development in infill areas, such as Priority Development Areas, should support alternative transportation.

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<sup>7</sup> Note: Growth projections do not sum to 100 percent because PDAs, TRAs, and HRAs are not mutually exclusive.



- **Policy CI 1.4:** Control the spacing of access points to adjoining properties along arterials to assure the free flow of traffic on the arterial, except as needed to support access for pedestrians and bicyclists.
- **Policy CI 1.5:** Plans for new development in higher density infill areas, including Priority Development Areas, should facilitate walking and bicycling.
- **Objective CI 2:** Achieve a coordinated regional and local transportation system that minimizes traffic congestion and efficiently serves users.
- **Objective CI 3:** Street and highway improvements shall provide adequate and appropriate levels of service for all streets in Fairfield.
  - **Policy CI 3.4:** When a traffic study is required for an application for new development, the City will require that the study include an analysis of the appropriate local and collector intersections that may be affected by the proposal. The study shall also consider impacts of the project and the project's road improvements on pedestrian and bicycling circulation and safety and shall propose mechanisms for mitigating such impacts and improving access for bicyclists and pedestrians.
- **Objective CI 5:** Provide adequate parking and loading facilities while encouraging alternative means of transportation.
  - **Policy CI 5.1:** Development projects shall provide off-street parking as required in the Zoning Ordinance or other governing ordinances, policies or plans. Reduced standards will be considered for projects in close proximity to transit.
  - **Policy CI 5.6:** Permit reductions in on-site parking in exchange for pedestrian and bicycling improvements, such as secure bicycle parking, private shuttle services, or subsidized transit pass programs. Where appropriate, permit the use of off-site parking areas, on-street parking, and other alternatives to parking lots and parking garages.
- **Objective CI 7:** Develop a transit network capable of satisfying both local and regional travel demand.
  - **Policy CI 7.1:** Encourage maximum utilization of the existing transit system in Fairfield.
- **Objective CI 9:** Support bicycling as a safe method of everyday transportation for all people in Fairfield. Bicycle facilities should link residences, major activity centers, employment, public services, recreational facilities, and regional bicycle routes.
  - **Policy 9.1:** Ensure that all development projects incorporate bicycle infrastructure consistent with this Circulation Element.
  - **Policy CI 9.3:** Facilitate and promote bicycling by providing adequate information to bicyclists regarding routes, facilities, and destinations.

- **Objective CI 10:** Provide pedestrian facilities throughout the City to encourage walking as an alternative to short distance vehicle travel.
  - **Policy CI 10.1:** Provide pedestrian facilities that are safe and pleasant to use.
  - **Policy CI 10.7:** Require new commercial and residential developments to provide walkways that are safe and pleasant to the user.
  - **Policy CI 10.8:** Encourage existing facilities and require future facilities to provide access to disabled persons.
- **Objective CI 12:** Contribute towards improving the air quality of the region through more efficient use of private vehicles and increased use of alternative transportation modes.

#### 4.12.3 Significance Criteria

The significance criteria for transportation impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The proposed project may be deemed to have a significant impact with respect to transportation if it would:

- **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.**
- **Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).**
- **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**
- **Result in inadequate emergency access.**

To apply the significance criteria listed above, the analysis in this section uses the following significance thresholds, which are based on State and local guidance.

**Criterion 1.** The following thresholds are used to determine whether the proposed project would conflict with an applicable plan, ordinance, or policy, including the congestion management program.

**Transit.** Based on General Plan Objectives CI 1, 2, 5, 7 and 12 and the City's interpretation of Appendix G of the *State CEQA Guidelines*, conflicts with a program, plan, ordinance, or policy related to transit would be considered significant if the project would:

- a. Disrupt existing transit services or facilities. This includes disruptions caused by project access points or staging areas near streets used by transit and transit stops/shelters; or
- b. Interfere with planned transit services or facilities; or

- c. Conflict or create inconsistencies with adopted transit system plans, guidelines, policies, or standards.

***Bicycle and Pedestrian Facilities.*** Based on General Plan Objectives CI 1, 2, 5, 9, 10 and 12 and the City's interpretation of Appendix G of the *State CEQA Guidelines*, conflicts with a program, plan, ordinance, or policy related to bicycle and pedestrian facilities would be considered significant if the project would:

- a. Disrupt existing or planned bicycle or pedestrian facilities; or
- b. Create inconsistencies with adopted bicycle or pedestrian system plans, guidelines, or policy standards.

**Criterion 2.** The following threshold is used to determine whether the proposed project would exceed the applicable VMT threshold of significance.

***VMT.*** Based on the thresholds set forth in the *Fairfield Guidelines for Project VMT Screening Transportation Analysis*, impacts related to VMT would be considered significant if the project would:

- a. Generate VMT per multifamily dwelling unit that would be in excess of 85 percent of the citywide average VMT per multifamily dwelling unit.

VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the amount and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development located at great distances from other land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density, mix of land uses, and numerous ways of travel. Therefore, low-density development in a suburban area typically generates more VMT per capita compared to a similarly sized development located in urban areas. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy usage, than lower VMT areas. VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips.

Lead agencies have the discretion to set their own thresholds of significance with the goals of the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. OPR recommends using VMT per capita as the threshold for residential projects.<sup>8</sup> As described above, the City, as Lead Agency, adopted thresholds for residential projects based on VMT per single-family dwelling unit and VMT per multi-family dwelling unit. The City of Fairfield travel demand model uses residential units as inputs rather than population, and therefore generates VMT outputs in terms of residential units. OPR states that it is critical that an agency be consistent in its VMT measurement approach throughout the analysis to

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<sup>8</sup> OPR. 2018. Op. cit.

maintain an “apples-to-apples” comparison. Therefore, because the inputs and outputs from the VMT model are based on residential units, the City has determined that a VMT threshold based on VMT per dwelling unit is appropriate.

**Criterion 3.** The following threshold is used to determine whether the proposed project would substantially increase hazards due to a design feature or incompatible uses.

**Hazards.** Based on the City’s interpretation of Appendix G of the *State CEQA Guidelines*, impacts related to hazards would be considered significant if the project would:

- a. Substantially increase hazards due to a geometric design feature; or
- b. Result in an incompatible land use.

**Criterion 4.** The following threshold is used to determine whether the proposed project would conflict or create inconsistencies with adopted transit system plans, guidelines, policies, or standards.

**Emergency Access.** Based on the Safety Element of the *City of Fairfield General Plan* and the City’s interpretation of Appendix G of the *State CEQA Guidelines*, impacts related to emergency access would be considered significant if the project would:

- a. Limit emergency vehicle access routes or roadway facilities; or
- b. Have less than two emergency access points.

#### 4.12.4 Methodology

##### 4.12.4.1 Proposed Project

As described in **Chapter 3.0: Project Description**, of this EIR, development of the proposed project would result in the construction of a single four-story, approximately 204,144-square-foot apartment building with 185 residential units, an approximately 54,845-square-foot two-story parking structure with additional surface parking areas surrounding the apartment building and clubhouse that would accommodate residents and visitors. The first level of the parking structure would be accessed by vehicles via four entrances/exits: one on the north side, two on the east side, and one on the south side of the structure. Parking would also be provided in private garages and carports as well as surface parking spaces along the perimeter of the project site. Overall, the proposed project would include a total of 332 parking spaces. Of the 332 parking spaces, 9 spaces would be ADA-compliant. As 2022 CALGreen will go into effect in January 2023, the proposed project would meet 2022 CALGreen’s mandatory electrical vehicle (EV) parking requirements for electric vehicle supply equipment (EVSE),<sup>9</sup> EV ready,<sup>10</sup> and EV capable<sup>11</sup> spaces. The project would

<sup>9</sup> Electric vehicle supply equipment (EVSE) space refers to a space where an EV charging station/dock is installed.

<sup>10</sup> “EV ready” refers to a space which is ready for EV charging and equipped with a receptacle or charger.

<sup>11</sup> “EV capable” refers to a space which has capability or infrastructure to facilitate future EV charging.

also include additional EV capable spaces that would have the necessary conduits so that they may be converted in the future into additional charging stations and/or EV ready spaces.

**Trip Generation.** Trip generation rates were determined using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. The ITE rate for Mid-Rise Multifamily Housing was used to determine project trip generation. As shown in **Table 4.12.B: Project Vehicle Trip Generation**, application of the trip generation rates would result in a project-generated increase in the number of daily AM and PM peak-hour vehicle trips. The proposed project would generate 840 new daily vehicle trips, 68 net new AM peak-hour vehicle trips (16 inbound trips and 52 outbound trips), and 72 net new PM peak-hour vehicle trips (44 inbound trips and 28 outbound trips).

**Table 4.12.B: Project Vehicle Trip Generation**

| Land Use                       | Units              | ITE Code | Vehicle Trips |              |     |       |              |     |       |
|--------------------------------|--------------------|----------|---------------|--------------|-----|-------|--------------|-----|-------|
|                                |                    |          | Daily         | AM Peak Hour |     |       | PM Peak Hour |     |       |
|                                |                    |          |               | In           | Out | Total | In           | Out | Total |
| Multifamily Housing (Mid-Rise) | 185 dwelling units | 221      | 840           | 16           | 52  | 68    | 44           | 28  | 72    |

Source: Fehr & Peers (2022).  
 ITE = Institute of Transportation Engineers

#### 4.12.5 Project Impacts

The following describes the potential impacts pertaining to transportation conditions that could result from implementation of the proposed project. As applicable, conditions of approval (COAs) and mitigation measures are presented to reduce significant impacts.

##### 4.12.5.1 Conflict with Circulation System, Transit, Roadway, Bicycle, and Pedestrian Facilities Policies

**Impact TRA-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.**

This section discusses the proposed project’s impacts related to conflicts with applicable plans, ordinances, and policies related to the circulation system. As discussed in more detail below, for CEQA purposes, the proposed project would not conflict with applicable plans, ordinances, and policies that address the circulation system; therefore, the impact would be less than significant.

**Transit Facilities.** The proposed project would generate vehicle trips in the vicinity of existing transit services and would generate some new transit trips to existing routes. The addition of 72 vehicle trips during the PM peak hour, or 1 to 2 new vehicles per minute, would not create a disruption to transit service in the vicinity of the project site. According to the United States Census Bureau, approximately 90 percent of residents within Fairfield commute by automobile, including driving

alone and in a carpool.<sup>12</sup> Therefore, most residents of the project are expected to travel by automobile to and from the project site and the proposed project would not be expected to generate a substantial number of new transit trips that would cause any transit route to require additional capacity. The proposed project would not include features that would disrupt existing or planned transit routes or facilities. The project site's driveways would not cause disruptions to existing or planned transit service or transit stops. The proposed project would not conflict with any adopted transit system plans, guidelines, policies, or standards. Therefore, impacts to transit facilities would be less than significant.

**Pedestrian and Bicycle Facilities.** As shown in **Figure 3-11: Proposed Circulation Plan in Chapter 3.0:** new on-site pathways would provide direct, barrier-free non-motorized access to all entrances of the proposed apartment building and parking garage. As described previously, the project site is served by existing public sidewalks and Class II bike lanes along both Green Valley Road and Business Center Drive. The proposed project would not result in any alterations to existing pedestrian or bicycle facilities adjacent to the project site such that the City's ability to make improvements would be obstructed. Therefore, potential impacts related to pedestrian and bicycle facilities would be less than significant.

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable

#### 4.12.5.2 VMT

**Impact TRA-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).**

Senate Bill 743 and the resulting *State CEQA Guidelines* update replaced the use of LOS for evaluating the significance of a project's transportation impacts with the use of daily VMT. VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the amount and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development at great distances from other land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density, mix of land uses, and numerous ways of travel. Therefore, low-density development in suburban areas typically generates more VMT per capita compared to a similarly sized development in urban areas. In general, higher VMT areas are associated with more air pollution, including GHG emissions, and energy usage than lower VMT areas. VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips.

<sup>12</sup> United States Census Bureau. 2020. American Community Survey 5-Year Estimates. Website: <https://data.census.gov/cedsci/profile?g=1600000US0623182> (accessed May 2022).

The proposed project would increase the number of new housing units in the area and reduce the potential for new business park and industrial development, which are the designated uses for the project site under the City’s General Plan. The existing City of Fairfield Travel Demand Model assumes one single-family residential unit and 102,000 square feet of office uses in the transportation analysis zone (TAZ) that includes the project site (TAZ 245). No multifamily residential units were assumed within TAZ 245 in the Travel Demand Model. Therefore, the 185 multifamily dwelling units included in the proposed project were added to TAZ 245 to evaluate the project’s impacts related to VMT. The VMT analysis results are summarized in **Table 4.12.C: VMT Analysis Summary**.

**Table 4.12.C: VMT Analysis Summary**

| Scenario | Baseline (VMT/MFDU) | CEQA Threshold <sup>1</sup> (VMT/MFDU) | Project VMT (VMT/MFDU) | Delta versus CEQA Threshold |
|----------|---------------------|--|------------------------|-----------------------------|
| Existing | 51.9                | 44.1                                   | 46.3                   | +2.2 (5%)                   |

Source: Fehr & Peers (2022).

<sup>1</sup> Based on the City of Fairfield CEQA VMT Thresholds, CEQA Threshold is 85% of the existing/baseline citywide average VMT per multifamily dwelling unit.

MFDU = multifamily dwelling unit

VMT = vehicle miles traveled

As described previously, the proposed project would result in a significant VMT impact if the project VMT would exceed 85 percent of the citywide average VMT per multifamily dwelling unit under existing conditions, i.e., exceed 44.1 VMT/MFDU. As shown in **Table 4.12.C**, the proposed project is expected to result in 46.3 VMT per multifamily dwelling unit, which exceeds the 44.1 VMT per multifamily dwelling unit threshold by approximately 5 percent. While the addition of the proposed project reduces the Citywide average VMT for multifamily dwelling units to 51.8 per multifamily unit, the proposed project would exceed the significance threshold. Therefore, implementation of vehicle trip reduction programs would be required. **Mitigation Measure TRA-1**, which is identified below, would require the implementation of a Transportation Demand Management (TDM) Program that would motivate the tenants to use alternatives to automobile travel through both positive incentives that encourage walking, biking and transit use, and through disincentives that impose a higher cost on people who choose to use personal automobiles for travel. Positive incentives include pedestrian improvements and carshare, bikeshare and scootershare programs, whereas disincentives include separately charging for parking as described below. Implementation of these measures would provide the required reduction in the VMT per multifamily dwelling unit. Therefore, this impact would be less than significant with mitigation. As noted in **Chapter 3.0: Project Description**, the project includes secured parking for bicycles and a bicycle repair station which would encourage bicycle use and would reduce VMT. However, because the VMT reduction benefits provided by these project features cannot be separated easily from benefits provided by the proposed mitigation measures, these project features are not included in the mitigation effectiveness analysis below.

**Level of Significance prior to Mitigation:** Potentially Significant

**Mitigation Measures:** The following mitigation measure will be implemented to reduce the impact related to VMT:

- MM TRA-1** The project applicant shall prepare and implement a Transportation Demand Management (TDM) Program that includes measures to reduce the vehicle miles traveled (VMT) per multifamily dwelling unit by a minimum of 5 percent. At a minimum, the TDM Program shall include the following measures:
- **Unbundled Parking Program:** The project applicant shall separate the cost of renting parking spaces from the cost (rent) of the rental unit. Tenants shall be required to pay separately for every parking space that they would use (When the cost of parking is optional, rather than built into housing costs, those without cars aren't burdened with paying for unwanted parking, and people who would use a car often change their behaviors to avoid the extra cost).
  - **Pedestrian-Network Improvements:** The project applicant shall improve pedestrian access to the nearest transit stops, as well as include pedestrian-oriented elements such as planters, benches, widened sidewalks, and improved lighting, in the site plan.
  - **Carshare, Bikeshare, and Scootershare Program:** The project applicant shall establish a carshare, bikeshare, electric bikeshare, and scootershare program to provide tenants alternatives to the use of a personal vehicle.

**Level of Significance after Mitigation:** An analysis of the effectiveness of these measures was completed using the TDM+ tool that has been developed specifically for this purpose. Rates of VMT reduction associated with the listed TDM measures were obtained from the *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, prepared by the California Air Pollution Control Officers Association (CAPCOA). Based on the analysis, implementation of the measures listed above would reduce the project's VMT by at least 7.6 percent. As this reduction is greater than the 5 percent reduction needed to mitigate the project's impact, implementation of the mitigation measure would reduce the impact to less than significant.

#### 4.12.5.3 Transportation Hazards

**Impact TRA-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

For purposes of CEQA, hazards refer to engineering aspects of a project (e.g., speed, turning movements, complex designs, substantial distance between street crossings, sight lines) that may create a risk of collisions that could result in serious or fatal physical injury than a typical project. This analysis focuses on hazards that could reasonably stem from the project itself, beyond collisions that may result from aforementioned non-engineering aspects or the transportation system as a whole. Therefore, the methodology qualitatively addresses the potential for the project to



exacerbate an existing or create a new potentially hazardous condition to people walking, bicycling, or driving, or for public transit operations.

The proposed project would not create a hazard in the project area by developing the site with a use that would be considered incompatible, because the proposed multifamily residential use would not generate any unusual traffic patterns that could conflict with existing traffic in the project area. Further, the proposed project does not involve any changes to the roadway network outside the project limits and the proposed project would not include any design features that could cause potentially hazardous conditions. Vehicle access to the project site would be provided via an existing driveway along Business Center Drive. Entry to the proposed parking garage would occur more than 400 feet from Business Center Drive, and therefore adequate onsite queuing space would be provided. Additionally, as with current practice, the proposed project would be designed and reviewed in accordance with the City's Public Works Department Transportation Program and the department would provide engineering review to ensure that the project's ingress and egress roadway, internal roadways and drive aisles, and the proposed parking structure are designed and constructed according to City specifications. Therefore, the proposed project would not create a substantial hazard due to a project design feature, and the impact would be less than significant.

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable

#### 4.12.5.4 Emergency Access

**Impact TRA-4: The proposed project would not result in inadequate emergency access.**

The proposed project would not result in adequate emergency access, both during construction and during its occupancy and operation.

Project construction activities would not affect the travel lanes on Green Valley Road, but may require temporary lane closures on Business Center Drive. However, one travel lane would always be kept open for traffic, and temporary lane closures would be implemented consistent with the recommendations of the *California Temporary Traffic Control Handbook* (California Inter-Utility Coordinating Committee 2018). Among other things, the manual recommends early coordination with affected agencies to ensure that emergency vehicle access is maintained. In this manner, officials can plan and respond appropriately to direct the public away from Business Center Drive, as appropriate, in the event of an emergency requiring evacuation. Therefore, construction activities associated with the proposed project would not result in inadequate emergency access.

With respect to adequate emergency access to the project site during project occupancy and operation, the Safety Element of the *City of Fairfield General Plan* requires that "... no development project should rely on a single entry/exit road. Rather, multiple entrance and exit roads should be provided to ensure emergency vehicle access." Therefore, the proposed project would have a significant impact if two or more emergency access points have not been identified.

The proposed project would be accessed from an existing drive aisle that connects the Fairfield Business Center to Business Center Drive. From this drive aisle, the project would be connected via two driveways, and therefore would provide adequate emergency access to the project site in compliance with the General Plan. Furthermore, the Preliminary Fire Access Plan, as shown in **Figure 4.14.1: Preliminary Fire Access Plan**, in **Section 4.14: Wildfire**, prepared for the proposed project has been reviewed and approved by the City of Fairfield Fire Department. Therefore, the impact related to inadequate emergency access would be less than significant. (Note that the potential for the proposed project to interfere with emergency response plans and evacuation plans is addressed in **Section 4.14: Wildfire**.)

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable

#### 4.12.5.5 Cumulative Impacts

This section discusses potential cumulative impacts to the transportation and circulation network in the study area. As summarized in this section, the proposed project, in combination with cumulative projects, would have less than significant impacts with respect to conflicts with applicable plans, VMT, hazards, and emergency access.

**Cumulative Impact C-TRA-1: Development of the proposed project would not conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities under cumulative conditions.**

For reasons set forth in **Impact TRA-1**, the proposed project would not conflict with plans and policies of the City of Fairfield related to the circulation system. Other approved projects would also not conflict with plans related to the circulation system and future development would be required to comply with existing regulations, including General Plan policies that have been prepared to minimize impacts related to transportation and circulation. Furthermore, the City would continue to annually update its Capital Improvement Program to reflect City and community priorities for implementing projects that improve the circulation system for all travel modes. Therefore, for these reasons, the proposed project, in combination with past, present, and reasonably foreseeable projects, would have a less than significant cumulative impact with respect to conflict with adopted policies, plans, or programs regarding public transit, roadway, bicycle, or pedestrian facilities.

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable

**Cumulative Impact C-TRA-2: Development of the proposed project, in combination with past, present, and reasonably foreseeable future developments, would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).**

Consistent with the OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), a project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The Technical Advisory notes that a project that falls below an efficiency-based threshold that aligns with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact.

As described above, the proposed project is expected to result in 46.3 VMT per multifamily dwelling unit, which would exceed the significance threshold. Therefore, implementation of vehicle trip reduction programs would be required per **Mitigation Measure TRA-1**. With the implementation of the proposed mitigation measure, the project's VMT would fall below the efficiency-based threshold of 44.1 VMT per multifamily dwelling unit. Therefore, the project impact would be reduced to less than significant with mitigation, and the project's contribution to a cumulative impact would be rendered not considerable by the same mitigation measure.

**Level of Significance prior to Mitigation:** Potentially Significant

**Mitigation Measures:** Implement **Mitigation Measure TRA-1**.

**Level of Significance after Mitigation:** Less than Significant

**Cumulative Impact C-TRA-3: Development of the proposed project, in combination with reasonably foreseeable future developments, would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

Overall, cumulative land use development and transportation projects would promote accessibility for people walking, bicycling, and driving in the vicinity of the project site by conforming to General Plan policies and Zoning regulations, and by adhering to planning principles that emphasize providing convenient connections and safe routes for people walking, bicycling, driving, and taking transit. A list of cumulative projects in the vicinity of the project site is included in **Table 4.A:**

**Cumulative Projects in the Vicinity of the Project Site in Chapter 4.0: Environmental Setting, Impacts, and Mitigation Measures.** Cumulative projects generally consist of residential, commercial, and industrial projects, as well as a new fire station. These urban land uses would not be considered incompatible uses and would not generate unusual traffic that could increase hazards in the project area. In addition, as described above, conformance with General Plan policies and Zoning regulations would ensure that cumulative projects do not include any improvements that could create new transportation hazards. Finally, as is current practice, projects would be designed and reviewed in accordance with the City's Public Works Department requirements and the department would provide engineering review to ensure that the projects are constructed according to City

specifications. As a result, the cumulative projects would not increase traffic hazards due to a design feature or incompatible use. For these reasons, the proposed project, in combination with cumulative projects, would have a less than significant cumulative impact with respect to design features or incompatible uses.

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable

**Cumulative Impact C-TRA-4: Development of the proposed project, in combination with reasonably foreseeable future developments, would not result in inadequate emergency access.**

Future development, as part of the City's project approval process, would be required to comply with existing regulations, including General Plan policies and zoning regulations that have been prepared to minimize impacts related to emergency access. The City would implement the General Plan programs that require the City's continued coordination with the Police and Fire Departments to review and approve site plans for emergency access. A list of cumulative projects in the vicinity of the project site is included in **Table 4.A: Cumulative Projects in the Vicinity of the Project Site in Chapter 4.0: Environmental Setting, Impacts, and Mitigation Measures**. Cumulative projects generally consist of residential, commercial, and industrial projects, as well as a new fire station; all of these projects are located at a distance from the project site, with one exception. The Residence Inn project, which is under construction, is located immediately south of the project site. The Residence Inn would be accessed via two driveways along Business Center Drive, one of would connect to the existing drive aisle that connects the Fairfield Business Center to Business Center Drive that would also provide access to the project site. The project site would also be accessible from an additional driveway further east along Business Center Drive. Therefore, both the proposed project and the Residence Inn could utilize multiple driveways on Business Center Drive for emergency access. Furthermore, compliance with existing zoning regulations would help to minimize traffic congestion that could impact emergency access. For these reasons, the proposed project, in combination with cumulative projects, would have a less than significant cumulative impact with respect to emergency access.

**Level of Significance prior to Mitigation:** Less than Significant

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Not Applicable