VALLEJO PLANNING COMMISSION
REGULAR MEETING 7:00 PM

SEPTEMBER 9, 2026

HYBRID MEETING
www.Cityofvallejo.net

Council Chambers
555 Santa Clara Street
Vallejo, CA 94590

COMMISSIONERS
Anthony Taylor, (Chair)
VACANT
VACANT
Eric Blind
Tara Beasley-Stansberry
Wanda Madeiros
Chris White

NOTICE: Members of the Public will be able to participate in-person or remotely via Zoom	City Hall and the Council Chambers will be open to members of the public 30 minutes prior to the start of the meeting.
PUBLIC COMMENT: Members of the Public may provide public comments during the City Council Meeting in person or via ZOOM (https://ZoomRegular.Cityofvallejo.net), or via phone, by dialing (669) 900-6833.	**For additional instructions on how to speak remotely during public comment, please visit, www.cityofvallejo.net/publiccomment**
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Hybrid Options are available for members of the public to participate. To participate remotely

Option to Join by Computer	**Option to Join by Phone**
From your browser go to https://ZoomRegular.CityofVallejo.net to launch and join the zoom application. Meeting ID: 914 0075 0676# Meeting Password: 131313	Dial (669) 900-6833 Enter Meeting ID: 914 0075 0676# Meeting Password: 131313 Press *9 to digitally raise your hand from the phone. Press *6 to unmute/mute

Any supplemental writing related to an agenda item for an open session of a regular meeting that is distributed to all or a majority of all members of the Commission less than 72 hours before the meeting will be posted concurrently on the City's website at www.cityofvallejo.net/agendas Written material distributed during the meeting, will be available at the meeting if prepared by the City or after the meeting if prepared by someone else. Such materials may be obtained from the Commission Secretary

Vallejo City Council Chambers is ADA compliant. Devices for the hearing impaired are available from the Staff Secretary. Requests for disability related modifications or accommodations, aids or services may be made by a person with a disability to the Staff Secretary's office by contacting via email Dalia.Vidor@cityofvallejo.net or via telephone at (707) 648-4326 no less than 72 hours prior to the meeting as required by Section 202 of the Americans with Disabilities Act of 1990 and the federal rules and regulations adopted in implementation thereof

AGENDA

1. CALL TO ORDER

2. PLEDGE OF ALLEGIANCE

3. OATH OF OFFICE OF NEWLY APPOINTED COMMISSIONER(S)

4. ROLL CALL

5. CONSENT CALENDAR AND APPROVAL OF THE AGENDA

Consent Calendar items appear below, with the Secretary's or City Attorney's designation as such. Members of the public wishing to address the Commission on Consent Calendar items are asked to address the Secretary and submit a completed speaker card prior to the approval of the agenda. Such requests shall be granted, and items will be addressed in the order in which they appear in the agenda. After making any changes to the agenda, the agenda shall be approved. All matters are approved under one motion unless requested to be removed for discussion by a commissioner or any member of the public.

A. APPROVAL OF THE AGENDA

B. APPROVAL OF THE MINUTES

Recommendation: By motion, approve the August 3, 2026 - Regular Meeting minutes.

6. REPORT OF THE CITY COUNCIL LIAISON

7. COMMUNITY FORUM

Anyone wishing to address the Commission on any matter for which another opportunity to speak is not provided on the agenda, and which is within the jurisdiction of the Commission to resolve, is requested to submit a completed speaker card to the Secretary. When called upon, each speaker should step to the podium, state his/her name and address for the record. The conduct of the community forum shall follow those as the City Council and shall be limited to a maximum of fifteen (15) minutes, with each speaker limited to three minutes pursuant to Vallejo Municipal Code Section 2.20.300. The Commission may take information but may not take action on any item not on the agenda.

8. PUBLIC HEARING

A. HOLD A PUBLIC HEARING TO CONSIDER A RESOLUTION RECOMMENDING THE CITY COUNCIL AMEND VALLEJO GENERAL PLAN 2040 BY ADOPTING THE 2026 TRANSPORTATION ANALYSIS GUIDELINES

Project Name:	**Transportation Analysis Guidelines Update, PLN26-0121**
Project Summary:	**The Project consists of adopting the July 2026 Transportation Analysis Guidelines as an amendment to the Vallejo General Plan 2040. These Guidelines would replace the existing 2020 Interim CEQA Transportation Impact Analysis Guidelines ("Interim Guidelines") currently incorporated as Exhibit A to the General Plan.** **The Guidelines establish a uniform approach, methodology, and tool set to evaluate the effects of land use decisions and related transportation projects on the City's transportation system. The need for and final scope of Traffic Impact Analyses shall be determined by the City of Vallejo.**
Location:	**Citywide**
Applicant:	**City of Vallejo Planning and Development Services Department**
General Plan Land Use Designation:	**Various**
Zoning District:	**Various**
CEQA:	**The Project is not subject to CEQA pursuant to CEQA Guidelines Section 15378 because adoption of the updated Guidelines will not result in a direct physical change or a reasonably foreseeable indirect physical change in the environment. The updated Guidelines establish procedures for evaluating future projects; they do not approve development, authorize construction, change land-use designations, or increase development capacity.**

B. HOLD A PUBLIC HEARING TO CONSIDER A RESOLUTION RECOMMENDING THE CITY COUNCIL AMEND THE VALLEJO MUNICIPAL CODE BY ADDING CHAPTER 16.216 RELATING TO AFFORDABLE HOUSING REQUIREMENTS AND FINDING SUCH ACTION EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA GUIDELINES SECTION 15061(b)(3)

Project Name:	**Inclusionary Housing Ordinance, PLN26-0120**
Project Summary:	**The Project consists of adding a new chapter to Title 16 (Zoning) of the Vallejo Municipal Code to establish affordable housing requirements for residential development projects of 20 or more units. The proposed ordinance would require a modest percentage of units to be affordable to very low-, low-, or moderate-income households, while allowing alternative methods of compliance such as payment of an in-lieu fee. The ordinance would also establish affordable-unit standards, application requirements, and a waiver or adjustment process.**
Location:	**Citywide**
Applicant:	**City of Vallejo Planning and Development Services Department**
General Plan Land Use Designation:	**Various**
Zoning District:	**Various zoning districts allowing residential development**
CEQA:	**The Project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), the common-sense exemption, because the ordinance does not change allowable land uses, density, intensity, or the physical development envelope and does not approve any particular development project.**

C. HOLD A PUBLIC HEARING AND CONSIDER A RESOLUTION APPROVING A VARIANCE (PLN26-0151) FOR A 12-FOOT SECURITY STEEL WALL AROUND THE POLICE DISPATCH MODULAR BUILDINGS LOCATED AT 111 AMADOR STREET (APN:0056-216-080) AFTER FINDING THE PROJECT EXEMPT FROM ENVIRONMENTAL REVIEW

PURSUANT TO CEQA GUIDELINES SECTION 15303 (CLASS 3 - "NEW CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES")

Project Name:	**Police Dispatch Security Steel Wall**
Project Summary:	**The project consists of the installation of a 12-foot steel security wall adjacent to the new police dispatch modular building to provide enhanced protection.**
Location:	**111 Amador Street | APN:0056-216-080**
Applicant:	**Leonard Job — City of Vallejo Public Works Director**
Owner:	**City of Vallejo**
General Plan Land Use Designation:	**Public Facilities and Insitutions**
Zoning District:	**Public and Semi-Public**
CEQA:	**The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15303 (Class 3 — "New Construction or Conversion of Small Structures") of the state CEQA Guidelines.**

9. WRITTEN COMMUNICATIONS

10. REPORT OF THE PRESIDING OFFICER AND MEMBERS OF THE PLANNING COMMISSION

A. SECRETARY'S REPORT

B. CITY ATTORNEY'S REPORT

C. REPORT OF THE CHAIRPERSON AND MEMBERS OF THE COMMISSION

D. REPORT OF THE AD-HOC SUBCOMMITTEE

i. WORK PLAN AD-HOC SUBCOMMITTEE

11. OTHER

12. ADJOURNMENT

ADDITIONAL CITY INFORMATION

Members of the public can:

- Like us on Facebook and Instagram (@cityofvallejo)
- Sign up to receive City Communications via e-mail (www.cityofvallejo.net/subscribe)
- Sign up for emergency alerts at: alertsolano.com

I, Dalia Vidor, Staff Secretary do hereby certify that I have caused a true copy of the above notice and agenda to be delivered to

Anthony Taylor, (Chair)
VACANT
VACANT
Eric Blind
Tara Beasley-Stansberry
Wanda Madeiros
Chris White,

at the time and in the manner prescribed by law and that this agenda was posted at City Hall, 555 Santa Clara Street, CA at 5:00 p.m., August 31, 2026.

Dated: August 31, 2026	*Dalia Vidor* Dalia Vidor, Staff Secretary

CITY OF VALLEJO PLANNING COMMISSION
REGULAR MEETING MINUTES
COUNCIL CHAMBERS
August 3, 2026

1. CALL TO ORDER

The meeting was called to order at 7:04 p.m.

2. PLEDGE OF ALLEGIANCE

3. ROLL CALL

Present: Chair Taylor, Commissioners; Blind (late – arrived at 7:06 p.m.), White, Madeiros and Beasley-Stansberry

Staff present: Assistant City Attorney Zagaroli, Planning and Development Services Director Pollot, Planning Manager Orozco, Assistant Planner Baarsch

4. CONSENT CALENDAR AND APPROVAL OF AGENDA

A. APPROVAL OF THE AGENDA

B. APPROVAL OF THE MINUTES

Action: Moved by Madeiros, second by White, and carried unanimously (absent: Blind) to approve the Agenda and the July 20, 2026 – Regular-Meeting minutes.

5. REPORT OF THE CITY COUNCIL LIASION - NONE

6. COMMUNITY FORUM – NONE

7. PUBLIC HEARING

A.

PROJECT NAME:	Redwood Plaza Tentative Parcel Map
RECOMMENDATION:	Continue the Public Hearing to consider a Resolution finding the project exempt from Environmental Review Pursuant to CEQA guidelines Section 15315 (Class 15 – “Minor Land Division”) and approve a Tentative Parcel Map to subdivides a developed parcel into four parcels at 774 Admiral Callaghan Lane (APN:0069-340-370 & -080) to the

regular scheduled meeting of September 21, 2026 at 7 p.m.

Planning Manager Orozco requested to continue the item.

Commissioners asked questions and the applicant and staff responded.

Chair Taylor opened the Public Hearing.

Action: Move by Commissioner Madeiros, second by Commissioner Beasley-Stansberry, and carried unanimously to continue the Public Hearing to consider a Resolution finding the project exempt from Environmental Review Pursuant to CEQA guidelines Section 15315 (Class 15 – "Minor Land Division") and approve a Tentative Parcel Map to subdivides a developed parcel into four parcels at 774 Admiral Callaghan Lane (APN:0069-340-370 & -080) to the regular scheduled meeting of September 21, 2026, at 7 p.m.

B.

PROJECT NAME:	**7 BREW COFEE**
RECOMMENTADTION:	Hold a public hearing and consider a resolution approving a Major Use Permit, development Review, Design Review, Landscape Review and Vesting Tentative Map for a new Drive-Through 7 Brew Coffee at 1176 Admiral Callaghan Lane (APN:0081-010-350) after finding the project exempt from Environmental Review pursuant to CEQA guidelines Section 15303 and 15315.

Assistant Planner Baarsch presented the item.

Planning Commissioner asked questions and staff and the applicant responded.

Chair Taylor opened the Public Hearing.

Speakers: Micheal V.

Chair Taylor closed the public hearing.

Action: Motion by Commissioner Blind, second by Commissioner White, and carried unanimously to adopt a resolution finding the project exempt form environmental review pursuant to CEQA guidelines Section 15303 and 15315 and approving a Major Use Permit, Development Review, Design Review, Landscape Review and a Vesting Tentative Parcel Map for a new Drive-through 7 Brew Coffee at 1176 Admiral Callaghan Lane (APN:0081-010-350) subject to the conditions of approval as exhibit A to the resolution with the amendment to condition of approval A.14 for the change of hours of operation to return to the Planning Commission for consideration.

8. WRITTEN COMMUNICATIONS – NONE

9. REGULAR REPORTS

A. SECRETARY'S REPORT

Planning and Development Services Director Pollot and Planning Manager Orozco provided an update on permits, projects and updates on long range projects. Reminded the Commission that City Council has appointed two new Planning Commissioners and that the second meeting in August will be cancelled.

B. CITY ATTORNEY'S REPORT – NONE

C. REPORT OF THE PRESIDING OFFICER AND MEMBERS OF THE PLANNING COMMISSION

Commissioner Beasley-Stansberry commented on that the housing justice coalition held an event that bring awareness regarding renter protection and hearing firsthand experience of renters throughout the City. She is glad we are moving in a positive direction and making a lot of headway.

Commissioner Maderios asked for clarification of the renter protection policy being processed as part of the Downtown and Waterfront Specific plan updates and Planning and Development Services Director confirmed it will be for City wide policy.

D. REPORT OF THE SUBCOMMITTEES

I. WORK PLAN AD-HOC SUBCOMMITTEE

Commissioner Madeiros provided City Staff a copy of the draft document and City Staff provided them to the Commissioners. Commissioners provided positive comments on the document that was provided. Commissioner Blind provided potential fifth area to review, appreciated including existing housing stock.

Vice Mayor Matulac provided an update on the goal setting session that was held with the members of the City Council and comments were shared about including Planning Commission with the Economic Commission.

10. OTHER - NONE

11. ADJOURNMENT

The meeting was adjourned at 8:31 p.m.

ATTEST:

_____
ANTHONY TAYLOR, CHAIR

ATTEST:

_____
KRISTIN POLLOT, AICP
SECRETARY

STAFF REPORT – PLANNING
CITY OF VALLEJO
PLANNING COMMISSION

DATE: September 9, 2026

TO: Planning Commission

FROM: Hector Rojas, Long-Range Planning Manager

SUBJECT: **HOLD A PUBLIC HEARING TO CONSIDER A RESOLUTION RECOMMENDING THE CITY COUNCIL AMEND VALLEJO GENERAL PLAN 2040 BY ADOPTING THE 2026 TRANSPORTATION ANALYSIS GUIDELINES**

PROJECT INFORMATION

Project Name:	Transportation Analysis Guidelines Update, PLN26-0121
Project Summary:	The Project consists of adopting the July 2026 Transportation Analysis Guidelines as an amendment to the Vallejo General Plan 2040. These Guidelines would replace the existing 2020 Interim CEQA Transportation Impact Analysis Guidelines ("Interim Guidelines") currently incorporated as Exhibit A to the General Plan. The Guidelines establish a uniform approach, methodology, and tool set to evaluate the effects of land use decisions and related transportation projects on the City's transportation system. The need for and final scope of Traffic Impact Analyses shall be determined by the City of Vallejo.
Location:	Citywide
Applicant:	City of Vallejo Planning and Development Services Department
General Plan Land Use Designation:	Various
Zoning District:	Various
CEQA:	The Project is not subject to CEQA pursuant to CEQA Guidelines Section 15378 because adoption of the updated Guidelines will not result in a direct physical change or a reasonably foreseeable indirect physical change in the environment. The updated Guidelines establish procedures for evaluating future projects; they do not approve development, authorize construction, change land-use designations, or increase development capacity.

RECOMMENDATION

Staff recommends that the Planning Commission adopt a Resolution recommending City Council approval of the General Plan amendment and adoption of the updated July 2026 Transportation Analysis Guidelines.

ATTACHMENTS

1.	Staff Report
2.	Recommended Resolution
3.	Exhibit A to Recommended Resolution (July 2026 Transportation Analysis Guidelines)
4.	2020 Interim CEQA Transportation Impact Analysis Guidelines

CONTACT

Hector Rojas, Long-Range Planning Manager (707) 553-7283
Hector.Rojas@cityofvallejo.net

BACKGROUND AND DISCUSSION

Regulatory Background

Transportation studies have traditionally evaluated the effects of new development by measuring level of service (LOS). LOS describes how well a roadway or intersection operates based largely on vehicle delay. It is generally expressed as a letter grade from LOS A (representing little delay) to LOS F (representing substantial congestion and delay).

Although LOS is useful for evaluating roadway operations, its former use as a CEQA impact metric could create an unintended disincentive for infill development. Projects located in established neighborhoods, downtowns, and areas near transit often add vehicles to already developed streets and intersections. Under an LOS-based CEQA analysis, those projects could be identified as having significant transportation impacts because they increased delay, even when their residents, employees, or customers drove shorter distances and generated less overall automobile travel than comparable development at the edge of a community.

Senate Bill (SB) 743, enacted in 2013, changed this approach. The legislation was intended to better align transportation analysis with statewide goals to reduce greenhouse gas emissions, encourage infill development, support public transit and active transportation, and promote a more efficient land-use pattern. In response, the State CEQA Guidelines established vehicle miles traveled (VMT) as the metric for evaluating transportation impacts under CEQA beginning July 1, 2020.

VMT measures the amount and distance of automobile travel generated by a development project. For example, a housing project whose residents make shorter trips or can reach jobs, shopping, services, and transit without driving as far generally produces less VMT than a comparable project in a location where destinations are farther away. By focusing on the amount of driving rather than intersection delay, VMT analysis is intended to recognize the transportation and environmental benefits of compact, infill, and transit-supportive development.

SB 743 did not eliminate LOS the ability for cities to conduct/consider analysis. Cities may continue to use LOS and other operational measures outside CEQA to evaluate roadway function, access, queuing, traffic safety, and consistency with local transportation policies. The updated Guidelines therefore distinguish between a non-CEQA Traffic Impact Analysis, which addresses roadway operations and related local concerns, and a CEQA Transportation Assessment, which evaluates VMT and the other transportation questions contained in CEQA.

Interim Guidelines

To meet the SB 743 statewide VMT implementation deadline, the City prepared interim CEQA Transportation Impact Analysis Guidelines in early 2020. The interim Guidelines established initial VMT screening criteria, significance thresholds, analysis procedures, and mitigation guidance for development projects in Vallejo.

On July 14, 2020, the City Council adopted Resolution No. 20-096 N.C., approving the interim Guidelines through a General Plan amendment and incorporating them into the Vallejo General Plan 2040 as Exhibit A. The interim Guidelines have provided the City with an SB 743-compliant framework while the City gained experience applying VMT analysis and developed a more comprehensive and updated set of transportation-analysis procedures.

Following adoption of the July 2020 interim Guidelines, an internal update was prepared in October 2020; however, that update was never formally adopted, which has caused confusion in recent years with regard to which standards should be followed for new development projects.

Updated Guidelines

In August 2024, the City retained Fehr & Peers to update the City's CEQA transportation-analysis framework and prepare the July 2026 Transportation Analysis Guidelines. Fehr & Peers' work focused on updating and modernizing the VMT thresholds and screening criteria, technical methodologies for VMT analysis, current transportation-analysis practices, and mitigation guidance. Concurrently with the consultant work, the City's Public Works Department also developed an updated draft of the non-CEQA Traffic Impact Analysis procedures, which are proposed to be included in the updated Guidelines.

The updated Guidelines are intended for use by transportation engineering and CEQA professionals and establish a uniform framework for studies prepared in connection with development review. As described in the update Guidelines, the City may tailor the scope and methodology of an individual study based on a project's characteristics and surrounding transportation context.

Non-CEQA Traffic Impact Analysis

The first part of the updated Guidelines establishes requirements for non-CEQA Traffic Impact Analyses. These procedures were developed by the City's Public Works Department and are separate from CEQA. They are intended to help the City evaluate whether a project would affect the safe and efficient operation of the local transportation system.

The Public Works procedures establish general study triggers and provide direction for trip generation, trip distribution, study areas, traffic counts, analysis scenarios, roadway and intersection operations, access and internal circulation, vehicle queues, collision history, pedestrian and bicycle conditions, traffic calming, roadway adequacy, and fair-share contributions toward needed improvements. LOS remains an important consideration in this analysis because General Plan Policy MTC-2.5 establishes an advisory standard of LOS E or better, considered together with pedestrian, bicycle, transit, and emergency-access performance.

CEQA Transportation Assessment

The second part of the updated Guidelines establishes procedures for analyzing transportation impacts under CEQA. It identifies the VMT thresholds, screening criteria, model-based analysis procedures, cumulative analysis methodology, and mitigation measures that would generally be used for future development projects.

The updated Guidelines establish a threshold of 15 percent below the applicable average for residential and employment projects. Residential projects would be compared with the existing citywide household VMT per resident, while employment projects would be compared with the existing Bay Area regional VMT per employee. Regional retail projects would be evaluated based on whether they increase net regional VMT. Mixed-use projects would be evaluated by separating and analyzing their individual land-use components.

The updated Guidelines also establish three principal ways that a project may be screened from detailed VMT modeling when substantial evidence does not indicate that additional analysis is

necessary. These include screening based on project type, location within a low-VMT area, and proximity to qualifying transit. Projects that do not satisfy a screening criterion would be required to prepare a project-specific VMT analysis using the Solano-Napa Activity-Based Model or another methodology approved by the City.

Summary of Principal Changes

Compared with the interim Guidelines, the updated Guidelines provide a more comprehensive transportation-review framework. They clearly separate non-CEQA analysis of roadway operations, safety, access, queuing, and multimodal conditions from CEQA analysis of VMT.

The updated Guidelines also revise the City's VMT thresholds and screening criteria, including locally supported thresholds for small projects, local-serving uses, projects in low-VMT areas, and qualifying projects near transit. Projects that do not satisfy a screening criterion would be evaluated using the Solano-Napa Activity-Based Model or another City-approved methodology.

Finally, the updated Guidelines provide more detailed direction for baseline, project, and cumulative VMT analysis and incorporate current California Air Pollution Control Officers Association (CAPCOA) guidance regarding potential VMT-reduction measures.

CODE COMPLIANCE

Vallejo Municipal Code (VMC) Chapter 17.04 establishes the City's procedures for initiating, reviewing, noticing, hearing, recommending, and acting on amendments to the Vallejo General Plan 2040. These provisions require Planning Commission review and recommendation before the City Council takes final action on a General Plan amendment. Consistent with Government Code Sections 65353 and 65354, the Planning Commission must conduct a noticed public hearing and transmit a written recommendation to the City Council. A recommendation for approval requires the affirmative vote of not less than a majority of the Commission's total membership. VMC Section 17.04.060 provides that the City may amend the Vallejo General Plan 2040 when it finds that doing so is in the public interest.

Staff Analysis

Staff believes the proposed General Plan amendment is in the public interest because it would replace the interim 2020 framework with comprehensive and current procedures for evaluating transportation effects associated with future development. The updated Guidelines would: 1) distinguish non-CEQA operational and safety review from CEQA VMT analysis, 2) update the City's VMT thresholds and screening criteria, and 3) provide clearer study and mitigation procedures. The update is expected to improve the consistency, predictability, and efficiency of technical review for applicants, consultants, staff, decision-makers, and the public; reduce unnecessary analysis for projects that satisfy supported screening criteria; and better recognize the transportation and environmental benefits of infill, local-serving, low-VMT, and transit-supportive development. The amendment is in the public interest and consistent with the Vallejo General Plan 2040 because it improves the development-review process without changing land-use designations, permitted uses, or development capacity.

The amendment is consistent with and advances the Vallejo General Plan 2040. The updated Guidelines support Goal MTC-2, Mobile Community, and implement Policy MTC-2.1, Safety First; Policy MTC-2.4, Citywide Mobility; Policy MTC-2.5, Street Classification System; and Policy MTC-2.7,

Complete Streets. Together, these policies call for a safe and multimodal transportation network that considers pedestrians, bicyclists, transit riders, motorists, and emergency access.

The updated Guidelines also directly support Policy MTC-2.8, Transportation Demand Management, and Actions MTC-2.8A and MTC-2.8C, which call for measures and project-level strategies that reduce VMT. They further support Policy CP-1.6, Active Transportation Network, and Action CP-1.6D, which directs the City to develop guidelines for public and private projects that promote safe, convenient, and attractive bicycle and pedestrian facilities. By providing appropriate screening for transportation-efficient projects and recognizing the benefits of lower-VMT development, the updated Guidelines also advance Policy NBE-2.7, Jobs-Housing Balance; Policy NBE-2.8 and Action NBE-2.8A, which promote compatible infill development on vacant and underutilized sites; and General Plan objectives to focus development near existing and planned transit facilities and expand alternatives to automobile travel.

The amendment will maintain the internal consistency of General Plan 2040 because it replaces an existing transportation-analysis exhibit with an updated exhibit addressing the same subject. It does not amend the General Plan land-use map, change permitted uses or densities, increase development capacity, or modify the Vallejo General Plan 2040's growth assumptions.

NOTICE AND COMMENTS

In accordance with Government Code Sections 65090 and 65353 and applicable provisions of the VMC, notice of the September 9, 2026 Planning Commission public hearing was published in the Times-Herald and distributed to interested parties on August 19, 2026. As of preparation of this report, staff has received no public comments on this item. Any comments received after publication of this report will be provided to the Planning Commission before or at the public hearing.

ENVIRONMENTAL REVIEW

The proposed General Plan amendment and adoption of the updated Guidelines are not subject to CEQA pursuant to CEQA Guidelines Section 15378 because the action does not have the potential to result in either a direct physical change or a reasonably foreseeable indirect physical change in the environment. The action establishes procedures, thresholds, screening criteria, and technical requirements for evaluating future development applications. It does not approve development, authorize construction, modify land-use designations or development standards, increase development capacity, fund transportation improvements, or commit the City to a particular physical project.

Future development applications will remain subject to the CEQA review on a project-by-project basis. The updated Guidelines will provide the framework for evaluating transportation impacts based on project-specific information and other substantial evidence. Accordingly, no further environmental review is required for the proposed action.

CONCLUSION

Based on the analysis contained in this staff report, staff recommends that the Planning Commission adopt the attached Resolution recommending City Council approval of the General Plan amendment and adoption of the updated July 2026 Transportation Analysis Guidelines, as presented.

APPEAL PROCEDURE

This agenda item is a request for the Planning Commission's recommendation to the City Council and is not subject to appeal procedures because it is advisory and does not constitute a final decision on the Project.

LEVINE ACT:

This item is subject to the Levine Act. City elected and appointed officials, including candidates for City elected office, (City Officers) who have received a campaign contribution of more than $500 within 12 months prior from a party, participant, or their representatives involved in this proceeding may do either of the following: (1) disclose the contribution on the record and recuse themselves from this proceeding; OR (2) return the portion of the contribution that exceeds $500 within 30 days from the time the elected official knew or should have known about the contribution and participate in the proceeding.

All parties, participants, and their representatives must disclose on the record of this proceeding any contribution of more than $500 made to the City Officers, such as the Mayor and/or Councilmembers, within 12 months prior to the date of the proceeding. City Officers are prohibited from accepting, soliciting, or directing a contribution of more than $500 from a party, participant, or their representatives during a proceeding and for 12 months following the date a final decision is rendered.

CONTACT

Hector Rojas, Long-Range Planning Manager (707) 553-7283
Hector.Rojas@cityofvallejo.net

CITY OF VALLEJO PLANNING COMMISSION

PC26-16

A RESOLUTION OF THE PLANNING COMMISSION RECOMMENDING THE CITY COUNCIL AMEND VALLEJO GENERAL PLAN 2040 BY ADOPTING THE JULY 2026 TRANSPORTATION ANALYSIS GUIDELINES

* *

WHEREAS, the City of Vallejo has prepared updated Transportation Analysis Guidelines to establish a consistent methodology and set of requirements for evaluating the transportation effects of development projects, including roadway operations, access and circulation, safety, pedestrian, bicycle and transit facilities, roadway adequacy, traffic calming, and appropriate transportation improvements and mitigation; and

WHEREAS, the updated Guidelines distinguish between non-CEQA traffic analysis, which may continue to evaluate roadway and intersection operations and Level of Service (LOS), and CEQA transportation analysis, which implements Senate Bill 743 by using vehicle miles traveled ("VMT") as the primary metric for evaluating transportation impacts and establishes City-specific VMT thresholds and screening criteria; and

WHEREAS, the updated Guidelines are proposed to be incorporated into the City's General Plan through a General Plan amendment and would supersede and replace the City's Interim CEQA Transportation Impact Analysis Guidelines adopted in July 2020 and revised in October 2020 (currently incorporated into General Plan 2040 as Exhibit A), thereby providing updated technical direction for transportation impact analysis, VMT screening, thresholds of significance, and mitigation for development and transportation projects within the City of Vallejo (the "Project"); and

WHEREAS, Vallejo Municipal Code (VMC) Section 17.04.060 provides that the Vallejo General Plan 2040 may be amended when the City finds that doing so is in the public interest; and

WHEREAS, Government Code Section 65353 requires the Planning Commission to hold at least one noticed public hearing before approving a recommendation on the amendment of a general plan; and

WHEREAS, notices describing the Planning Commission's public hearing on the proposed General Plan amendment were mailed to all persons requesting notice pursuant to VMC Section 16.602.08, emailed to the members of the Planning Commission, and published in a 1/8th page advertisement in the Times-Herald, a newspaper of general circulation, on August 19, 2026, which date was not less than 10 days prior to the September 9, 2026 hearing, as required by Government Code Section 65090(a); and

WHEREAS, after giving all public notices required by State law and the VMC, the Planning Commission conducted a duly noticed public hearing on September 9, 2026, to consider and receive public testimony on the proposed General Plan amendment and updated Guidelines.

NOW, THEREFORE, LET IT BE RESOLVED that the Planning Commission hereby finds, determines, and resolves as follows:

Section 1. Recitals.

The foregoing recitals are true and correct, and the same are incorporated herein by reference.

Section 2. Record.

The Record of Proceedings ("Record") upon which the Planning Commission bases its recommendation includes but is not limited to: (1) the staff report, City files and records, and other documents prepared for the Project; (2) the evidence, facts, findings, and other determinations set forth in this Resolution; (3) the Vallejo General Plan 2040 and its Final Environmental Impact Report; (4) the Vallejo Municipal Code; (5) all designs, plans, studies, data and correspondence submitted to the City in connection with the Project; (6) all documentary and oral evidence received at public meetings and hearings or otherwise submitted to the City relating to the Project; and (7) all other matters of common knowledge to the Planning Commission, including City, State, and federal laws, policies, rules, regulations, reports, records, and projections related to development within the City of Vallejo and its surrounding areas.

The location and custodian of the records is the Planning and Development Services Department of the City of Vallejo, 555 Santa Clara Street, Vallejo, California 94590.

Section 3. California Environmental Quality Act Findings.

Based on the Record as described above, and all matters deemed material and relevant prior to adopting this Resolution, the Planning Commission hereby recommends that the City Council determine that the proposed amendment to the General Plan is not a project subject to CEQA pursuant to California Code of Regulations, Title 14, Section 15378, because the amendment establishes transportation analysis policies, procedures, and methodologies for the evaluation of future development projects and does not approve or authorize any specific development project or physical improvement. The proposed amendment therefore does not have the potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment, and no further environmental review is required at this time.

The Planning Commission further recommends that the City Council find that the proposed amendment will not result in environmental impacts beyond those previously analyzed and considered in the Final Environmental Impact Report (FEIR), certified in connection with adoption of General Plan 2040 in August 2017. Future development projects and transportation improvements will remain subject to applicable CEQA requirements and will be evaluated on a case-by-case basis to determine whether additional environmental review is required.

Section 4. Findings.

In accordance with VMC Section 17.04.060 and applicable State law governing General Plan amendments, the Planning Commission hereby makes the following findings regarding the proposed General Plan amendment adopting the updated Guidelines, attached hereto as Exhibit A and incorporated herein by reference.

A. The proposed General Plan amendment is in the public interest.

Facts in support: *The amendment will replace the interim 2020 transportation-analysis framework with comprehensive and current procedures for evaluating transportation effects associated with future development. The updated Guidelines will improve the consistency, transparency, predictability, and efficiency of transportation review for applicants, consultants, staff, decision-makers, and the public. They will also reduce unnecessary analysis for projects that recognize the transportation and environmental benefits of infill, local-serving, low-VMT, and transit-supportive development.*

B. The proposed General Plan amendment is consistent with and advances the Vallejo General Plan 2040.

Facts in support: *The updated Guidelines support Goal MTC-2, Mobile Community, and implement policies addressing transportation safety, citywide mobility, street performance, complete streets, transportation demand management, active transportation, infill development, and reduction of VMT. The updated Guidelines also support General Plan objectives to focus development near existing and planned transit facilities and expand alternatives to automobile travel.*

C. The Vallejo General Plan 2040 will remain internally consistent following the amendment.

Facts in support: *The amendment would remove and replace an existing transportation-analysis exhibit with an updated exhibit addressing the same subject. It will not amend the General Plan land-use map, change permitted uses or densities, increase development capacity, or modify the General Plan's growth assumptions.*

D. The proposed amendment will not be detrimental to the public health, safety, or general welfare.

Facts in support: *The updated Guidelines will strengthen the City's ability to evaluate roadway operations, collision history, pedestrian and bicycle conditions, emergency access, VMT, and feasible mitigation. They will not authorize development or reduce existing health or safety protections.*

Section 5. Decision.

BE IT FURTHER RESOLVED that, based on the findings set forth herein and the Record as a whole, the Planning Commission hereby recommends that the City Council amend the Vallejo General Plan 2040 by adopting the July 2026 Transportation Analysis Guidelines, attached hereto as Exhibit A and incorporated herein by reference, and by removing and replacing the City's Interim CEQA Transportation Impact Analysis Guidelines adopted in July 2020 and revised in October 2020, currently incorporated into the Vallejo General Plan 2040 as Exhibit A.

PASSED AND ADOPTED at a regular meeting of the Planning Commission of the City of Vallejo, State of California, on the 9th day of September 2026 by the following vote, to-wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____

ANTHONY TAYLOR, CHAIRPERSON
City of Vallejo Planning Commission

Attest:

_____

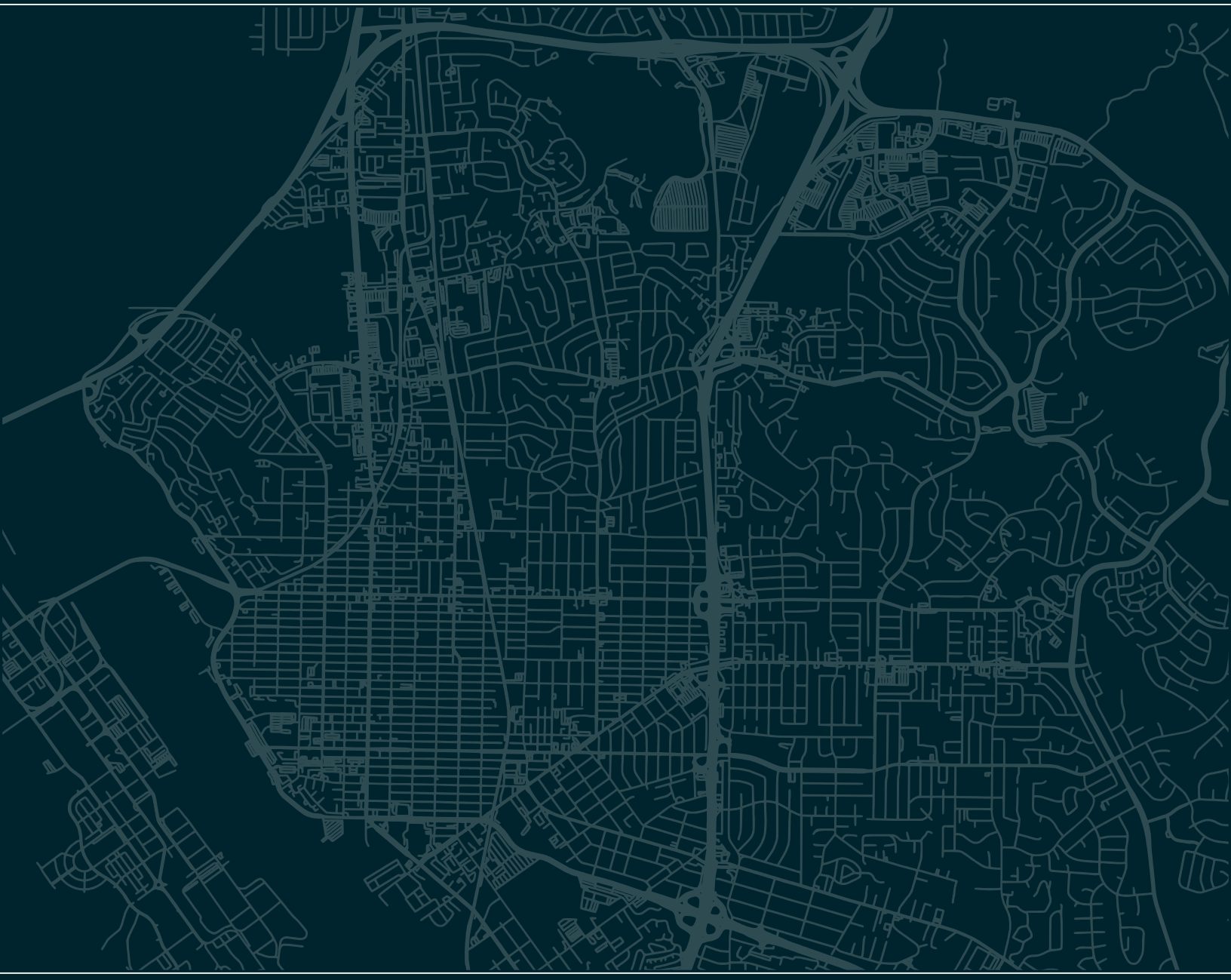
KRISTIN POLLOT, AICP – SECRETARY
City of Vallejo Planning Commission

Exhibits:

A. July 2026 Transportation Analysis Guidelines

City of VALLEJO California

Transportation Analysis Guidelines



Fehr & Peers

July 2026

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Introduction

These Transportation Analysis Guidelines establish general transportation impact study procedures and requirements for development projects within the City of Vallejo. They are designed for transportation engineering and California Environmental Quality Act (CEQA) professionals because of their technical contents. The term "guideline" is important: the City recognizes that every project and study context is unique. The guidelines are intended as a checklist for study preparers to ensure all required study items are included. They establish a uniform approach, methodology, and tool set to evaluate the effects of land use decisions and related transportation projects on the City's transportation system. They are not intended to eliminate professional judgment or creativity; however, the need for and final scope of a TIA shall be determined by the City of Vallejo.

The guidelines contain two sections which describe different analyses and requirements. The first section details the City's requirements related to the type of non-CEQA traffic analysis necessary for development projects, particularly as they relate to roadway levels of service (LOS). The second section details the City's transportation analysis requirements for CEQA projects, including the City's guidelines related to implementation of Senate Bill 743 (SB 743). SB 743 shifted the State of California's environmental regulations away from automobile delay and LOS to vehicle miles traveled (VMT). However, SB 743 does not prevent a city from continuing to analyze delay or level of service outside of CEQA review for other transportation planning or analysis purposes (i.e., general plans, impact fee programs, corridor studies, congestion mitigation, or ongoing network monitoring); but these metrics may no longer constitute the sole basis for CEQA impacts.

Non-CEQA Traffic Impact Analysis

The City Engineer, under the authority of the Public Works Director and recommendations from the City Traffic Engineer, will make the final decision on the requirement for a Traffic Impact Analysis (TIA) Study. The purpose of the TIA Study is to identify the impacts to traffic operations, including roadway network LOS calculations and identify feasible solutions to mitigate impacts of new development. The purpose of these guidelines is to provide the standard requirements for the preparation of a TIA study.

Traffic Impact Analysis (TIA) Study Requirement

The City's Public Works Department shall do an initial assessment of the project based upon the description and proposed land use(s). All consulting fees to perform the TIA study will be borne by the applicant. All studies shall be completed consistent with the City's General Plan and/or Solano Transportation Authority policies. The City may assume responsibility for administering the consultant agreement to perform the TIA study in certain circumstances (to be determined by the City at our sole discretion). In general, the requirement for a TIA study as part of the project review process will be based upon, but not limited to, the following criteria:

- Any project with initial traffic generation estimates showing that the project is likely to add 500 or more daily trips, and/or likely to add 100 or more trips in either peak period to the existing circulation system, without consideration of pass-by trip reductions. Phased projects must be evaluated assuming full build-out

conditions for purposes of determining the need for a TIA.

- Any project within a 1½-mile radius of any key intersections that currently operate at a level of service (LOS) D or worse and project is likely to contribute traffic and worsen this condition.
- Any project that generates more than 40 percent of its total traffic in the form of truck traffic using passenger car equivalents (PCE).
- Any project that intensifies the usage, density, or traffic generation of the site above the level currently allowed by zoning codes, requiring a General Plan or Zoning Amendment.
- Modifications are required to the original TIA that is more than three years old, or where the increase in traffic volume as measured by ADT, peak hour, or peak hour of the critical movement is more than 10%.

Trip Generation Estimates

1. **Trip Generation Rates**: Passenger vehicle trips shall be estimated using the rates and methodologies outlined in Trip Generation, latest edition, published by the Institute of Transportation Engineers (ITE). Approval must be obtained from the Public Works Director, City Engineer, or City Traffic Engineer prior to using any other source to establish project trips.

2. **Trip Generation Basis**: The basis of all trip generation calculations will depend on the type of land use proposed. The trips generated by most commercial and industrial uses should be based on gross floor area. The trips generated by most residential uses should be based on the number of dwelling units. A basis for how trips are established, including any methodologies and assumptions shall be noted in the report. An alternate basis for estimating the project trips may be approved and/or required by the Public Works Director, City Engineer, or City Traffic Engineer for certain special uses where more appropriate and known features of the project will result in a more accurate estimate.

3. **Unknown Trip Generation Rates**: Some unique types of development or uses may not have rates/formulas published by ITE. In this case, a trip generation study may be conducted at a similar existing facility to determine acceptable trip generation rates to be used in the study. The type and location of the similar existing facility and the study methodology must be pre-approved by the Public Works Director, City Engineer, or City Traffic Engineer.

4. **Pass-By and Diverted-Link Trips**: With prior Public Works Director, City Engineer, or City Traffic Engineer approval, pass-by and/or diverted-link trips may be calculated and used in estimating the project-generated trips using the procedures specified in the latest edition of Trip Generation. The pass-by and/or diverted-link trips must be justified by appropriate calculations. However, the reduced or net trips generated by the project should not be used to analyze project driveways and intersection(s) immediately adjacent to the project site (i.e., driveways and intersections in the immediate vicinity shall be analyzed using the full trip generation of the project). Typically, pass-by trips are associated with new fast-food restaurants, gas stations, and shopping centers, etc.

5. **Truck Trips**: Truck trips shall be calculated and shown separately. Peak hour distribution of inbound and outbound trucks shall be identified separately from passenger cars. For light industrial, industrial parks and warehouse uses, trip rates contained in the latest edition of Trip Generation shall be used. All truck trips shall be converted into passenger car equivalents (PCE) for intersection capacity analysis using the following factors:

    - 2-axle trucks: 2.0 PCE
    - 3-axle trucks: 2.5 PCE
    - 4- and more axle trucks: 3.0 PCE

Trip Distribution Assumptions

The study preparer shall specify, either independently or in consultation with the Public Works Department, the trip distribution assumptions to be used in the study and have them approved by the Department prior to completing the study. The distribution should be based on general socioeconomic characteristics of the study area, location and intensity of major trip generation and attraction centers, trip length information, origin-destination information (specifically for industrial and warehouse uses) and any other known but verifiable information. For heavy truck related uses, where truck trips comprise a minimum of 20 percent of the total generated trips after converting into passenger car equivalents, trip distribution assumptions for truck trips should be shown separately and presented in the report text and figures separately. Use of the Solano Napa Activity-Based Model (SNABM) or other approved model may be required to establish the project trip distribution.

Study Area

The scope of the TIA shall include at a minimum any key intersection or roadway segment within a one and a half (1 ½) mile radius area from the project site. All key intersections and roadway segments within this study area must be analyzed to identify impacts to capacity and LOS. The study intersections and roadway segments should be clearly identified for review and approval by the Public Works Department prior to initiating the study.

Projects located within Specific Plan areas for which a program level Environmental Impact Report (EIR) has been previously approved by the city, may be allowed to use a study area limited to the immediate vicinity of the project to determine the need for any traffic improvements, in addition to those already identified in the EIR. The TIA for this type of project must specifically identify any differences between the project and the land use assumed for the site in the Specific Plan and EIR. A meeting with Public Works or Planning Department staff will generally be necessary to discuss the specific scope of the study prior to preparing the study.

Analysis Procedure and Methodology

1. ***Traffic Counts:*** Existing average daily traffic volumes for study intersections and roadways shall be developed from 24-hour automatic machine counters or a recognized traffic counting agency or company. Existing peak period intersection turning movement volumes shall be developed from skilled personnel/technician manual counts or a recognized traffic counting agency or company. Typical count days are Tuesday, Wednesday, and Thursday of a typical non-holiday work week when local schools are in normal session. Counts taken on holidays and the day before and after a holiday should not be used. Days with abnormal traffic conditions (such as rain, construction activities, road closures, etc.) must be avoided. Counts in the vicinity of schools should be taken when the school is in session and pick-up and drop-off are occurring. New traffic counts may not be necessary if counts are available from another source such as traffic studies and/or City records if they have been obtained within the last two years and are pre-approved for use by the Public Works Department.

2. ***Peak Periods:*** Generally, both weekday morning (7 a.m. to 9 a.m.) and evening (4 p.m. to 6 p.m.) peak periods should be used in the analysis to identify traffic impacts and any level of service problems. In some cases, an off-peak or weekend period may be required as directed and approved by the Public Works Director, City Engineer, or City Traffic Engineer. The peak hours will be verified by 24-hour volume counts.

3. ***Analysis Scenarios:*** The following analysis scenarios, in the order shown, shall be included for roadway and intersection capacity analysis:

    a. Existing Year Traffic Condition (identify any existing deficiencies)

    b. Project Opening (Near – Term) Year Base Traffic Condition

    c. Project Opening (Near – Term) Year Base plus Other Proposed Projects Traffic Condition (Obtain Other Proposed Project information from the City in advance)

    d. Project Opening (Near – Term) Year Base plus Other Projects plus Project Traffic Condition

    e. Project Opening (Near – Term) Year Base plus Other Projects plus Project Traffic Condition with Mitigations, if necessary

    f. Future Build-out Year Cumulative Base (TBD – approved projection method) Traffic Condition

    g. Future Build-out Year Cumulative Base plus Project Traffic Condition

    h. Future Build-out Year Cumulative Base plus Project Traffic Condition with Mitigations, if necessary

    Additionally, a staging analysis may be required for phased projects to identify the timing of future phases and needed mitigation measures.

4. ***Internal Circulation & Access Management:*** Include a discussion on internal circulation and proposed on-site parking. Show and discuss how vehicles would enter and exit via the main access driveways and identify any on-site or off-site circulation problems. Identify the need for signal controls using traffic signal warrants specified in the latest edition of the California Manual on Uniform Traffic Control Devices (CAMUTCD).

    Requests for site access or access modification shall be addressed in the Traffic Impact Analysis. Study recommendations shall include site access and transportation improvements needed to maintain traffic flow to, from, within, and past the site at an acceptable and safe level of service. Areas to address include:

    - Separate conflict areas. Reduce the number of access points or increase their spacing so conflict areas or maneuvering areas do not overlap.
    - Limit the type of conflict areas by preventing certain maneuvers.
    - Remove turning vehicles or queues from through lanes
    - Safety of a proposed access (sight distance both horizontally and vertically), including pedestrian features.
    - Reduce the speed differential in through lanes between through vehicles and turning vehicles.
    - Consider the impact of access points on adjacent or nearby properties on both sides of the roadway.

    Improvements include such things as: relocation, restriction, or elimination of access points, roadway widening, turning lanes, traffic signals, and pedestrian facilities.

    The number of vehicle access points should be minimized by sharing driveways and linking parking lots between adjacent uses. Commercial developments shall provide coordinated internal circulation and connected parking facilities. Well-defined accessible walkways must be designed into all parking lots, with interconnections between walkways to create safe walking conditions and access to the site from the public right of way.

5. ***Capacity Analysis Method:*** The latest version of the Transportation Research Board's Highway Capacity Manual (HCM) shall be the basis for operational delay/LOS

calculations for signalized and unsignalized intersections. Several software packages are available for conducting LOS analysis. The latest version of the software package used must be identified in the report.

6. ***Traffic Growth:*** Use of the SNABM or other approved model may be required to determine the future traffic volumes and growth. It shall be the responsibility of the traffic consultant to obtain these from whatever source that provides the most accurate projection within that area.

   In the absence of traffic model information, the future build-out year base traffic volumes shall be estimated using an annual growth factor of 2 percent per year, unless a different rate can be justified and is approved and/or required by the Public Works Department. The horizon year for the cumulative analysis shall be the current horizon year of the SNABM travel demand model at the time of the TIA's preparation.

7. ***Traffic Impacts:*** The following criteria shall be used to assess when a project is determined to have a "significant" impact related to the operations of roadway facilities:

   The project deteriorates the operations of a signalized intersection from acceptable to unacceptable based on the level of service standard established in the General Plan.

   - The project results in a signalized intersection deteriorating from LOS E to LOS F.
   - The project adds ten or more trips to a signalized intersection projected to operate at an unacceptable level F prior to the addition of project traffic.
   - The project deteriorates the operations of a controlled movement at an unsignalized intersection from LOS E or better to LOS F, or at intersections where a controlled movement already operates at LOS F, one of the following:
     - Project traffic results in satisfaction at the peak hour volume traffic signal warrant; or
     - Project traffic increases minor movement delay by more than 30 seconds; or
     - Where the peak hour volume signal warrant is met without project traffic and delay cannot be measured, project increases traffic by 10 or more vehicles per lane on the controlled approach.
   - The addition of project traffic at a study intersection would result in the 95th percentile vehicle queue exceeding the available storage or would increase 95th percentile queue by more than two vehicles (50 feet) where the queue already exceeds the available storage space (for example, vehicle queues spilling back from ramp terminal intersections to the freeway mainline, or vehicle queues extending beyond the available turn pocket length, impeding travel in the adjacent lanes).

8. ***Mitigation Requirements:*** The report should identify level of service problems under existing conditions and identify measures that will provide an acceptable LOS. These measures shall be assumed to be in place for subsequent analyses. Mitigation measures must be identified for intersections that show a significant project impact per item 7 above and operate at LOS E or worse under the conditions identified in Items 3d and/or 3g above. The LOS with mitigation must be improved to LOS D or better for intersections and LOS C or better for roadway segments, under the conditions identified in Items 3e and/or 3h above. Identify mitigation measures for both opening year and future build-out year conditions. Mitigation measures may need to be identified for other conditions, depending on the project phasing and timing.

9. ***Mitigation Fair-share Cost Calculations:*** The percentage of fair-share for the project shall be calculated at each location using the total trips generated by the project divided by the total "new" traffic, which is the net increase in traffic volume from all proposed projects (Other Projects plus Project) and growth. The cost of mitigation shall be estimated using verifiable cost estimates from reliable and recognized sources. Fair-share cost of mitigation shall be calculated using the fair-share percentage of the project volumes multiplied by total estimated cost of mitigation.

10. ***Sight Distance:*** Sight distance restrictions shall be addressed in the TIA. Sight distance is the length of roadway visible to the driver. Specified areas along intersection approach legs and across their included corners should be clear of obstructions that might block a driver's view of potentially conflicting vehicles. These specified areas are known as clear sight triangles. The dimensions of the legs of the sight triangles depend on the design speeds of the intersecting roadways and the type of traffic control used at the intersection. Intersection sight distance calculations shall be based on the most recent edition of the AASHTO Manual or Caltrans Highway Design Manual.

11. ***Alternate Modes of Transportation:*** The TIA shall identify other transportation modes that may be applicable, such as transit use, bicycle, and pedestrian facilities. New developments are encouraged to implement Transportation Demand Management practices and introduce methods for trip reduction.

12. ***Safe Walking Conditions:*** The TIA must consider pedestrian connections and provision of safe and accessible walking routes. It shall consider sidewalks and other planning features to assure safe walking conditions. For sites near schools, the TIA will consider how site conditions will support safe routes to school for students.

13. ***Road Adequacy:*** The TIA shall include detailed discussion and analysis of the adequacy of roads serving the site and within the project. Recommendations for needed upgrades to local roadways shall be included in the TIA. For projects with significant heavy vehicle traffic, a preferred access route to/from the site for most heavy vehicle trips will be identified and the road segment's traffic index along that route will be analyzed.

14. ***Collision History:*** The TIA shall evaluate the most recent five years of vehicle, pedestrian, and bicycle collision data for all study intersections plus roadway segments in proximity to the project site as determined by the scope of work. The analysis shall:

    - Calculate street segment and intersection collision frequencies based on existing geometric configurations and five years of collision data.
    - Identify if there are crash patterns in the data by analyzing vehicle, pedestrian, and bicycle collisions by collision type, severity, primary collision factor, and movement. Summarize findings and observations, and collision rate using tables and narrative. For additional guidance, see chapters 5 and 6 of the AASHTO Highway Safety Manual (HSM).
    - Determine if the project would contribute to an existing problem or if any improvements are recommended to alleviate potential effects of the project. Consult the Federal Highway Administration's Crash Modification Factor (CMF) Clearinghouse and/or Part D of the HSM to identify potential needed safety treatments at study intersections. Review available CMFs related to assess potential treatments for the purposes of addressing project effects on safety. Identify the CMFs that are applicable based on the study

intersection characteristics and the source of the CMFs. Include a listing of CMF values, CMF standard errors (if given), and CMF quality based on FHWA 5-star rating system, with a focus on CMFs with 4-star or 5-star ratings.

- Identify potential improvements to geometric design, lane configuration, and/or signal equipment to improve transportation safety at study intersections.

15. ***Traffic Calming:*** Internal traffic calming shall be incorporated into all developments to control cut-through traffic and reduce speed within the development. The Traffic Impact Analysis shall identify and propose specific traffic calming measures and locations to be incorporated in the development. Traffic calming shall be aesthetically pleasing. Public transportation shall also be evaluated. The traffic-calming plan shall include an overall drawing of the development and identify specific locations and features to be included in the development. The proponent's traffic engineer shall work with the City Traffic Engineer to develop a traffic-calming plan for the development.

Report Format

To address traffic impact concerns, the TIA report shall contain the following:

Cover Page with an appropriate title of the Study and applicable application numbers, Preparer's name, mailing address, email address, phone and fax numbers, and preparation date.

Certification Page with a statement indicating that the study has been prepared by, or under the supervision of, a registered traffic engineer or professional engineer licensed to practice as a traffic engineer, and the preparer's signature and seal of registration.

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An **Executive Summary** (describing the study scope and findings) **Introduction** – (describing the project and the purpose of the study) **Data Collection, Data Source and Analysis Methodology**

Documentation of Analysis and Findings (details may be included in an appendix)

Identification of traffic impacts associated with the project

Identification of measures required to mitigate the traffic impacts associated with the project and their timing, if needed

Project Mitigation Fair-Share Cost Calculation as a percent of impact, if needed

Figures showing, at a minimum, the following:

- Vicinity Map
- Site Plan showing project driveways
- Existing traffic volumes (peak hours and ADT)
- Existing intersection lane configuration and traffic control Location of Related Projects
- Cumulative traffic volumes from other projects Project trip distribution percentages
- Project related traffic volumes, including at site-access driveways Project opening year cumulative traffic volume
- Build-out year traffic volume with Project
- Future lane configuration and traffic control used in future analysis
- Future lane configuration and traffic control used in future analysis with identified mitigation, if necessary.

Tables showing, at a minimum, the following:

- Project trip generation
- Other projects' trip generation
- Intersection Capacity Analysis results for various scenarios, identifying locations with significant impacts that require mitigation, if necessary
- Mitigation Measures, if necessary
- Calculation of Project's fair-share cost of mitigation, if necessary

Discussion of **internal circulation and access management**

Sight distance and safety at intersections and access points Transit, pedestrian, and bike access opportunities

Roadway adequacy

Conclusion

CEQA Transportation Assessment

This section describes the transportation analysis guidelines that establish general procedures and requirements for the preparation of California Environmental Quality Act compliant transportation studies for land-use development projects within the City of Vallejo. The guidelines outlined in this section shall be used in the preparation of the analysis contained within the transportation and circulation section of a CEQA document. This CEQA Transportation section is a standalone document different and separate from the TIA report outlined on pages 1 through 8 of this document. In general, the guidelines are designed for use by transportation engineering and CEQA professionals. These guidelines supersede and replace the City of Vallejo's prior guidelines on this topic (*City of Vallejo CEQA Transportation Impact Analysis Guidelines*, Fehr & Peers, July 2020, Revised October 2020).

SB 743 and the Updated CEQA Guidelines

Senate Bill 743, signed by the governor in 2013, changed the way transportation impacts are identified and measured in California. Specifically, the legislation directed the then Office of Planning and Research (now the Office of Land Use and Climate Innovation/LCI) to consider different metrics for identifying transportation impacts under the California Environmental Quality Act. OPR/LCI released its *Technical Advisory on Evaluating Transportation Impacts in CEQA*[1] in December 2018 in conjunction with the formal adoption of the CEQA Guidelines requiring vehicle miles traveled analysis for CEQA transportation analyses after July 1, 2020.

The updated guidelines include revised CEQA Appendix G Checklist criteria for transportation impact evaluation. The four criteria are as follows:

Would the project:

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

Criteria 2 addresses the implementation of the SB 743 requirement. CEQA Guidelines section 15064.3, subdivision (b) reads, in part, as follows:

1. *Land Use Projects. Vehicle-miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one half-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*
2. *Transportation Projects. Transportation projects that reduce, or have no impact*

[1] http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

3. *Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.*

4. *Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household, or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.*

Can LOS Analysis Still be Conducted as Part of Development Review?

A key element of SB 743 is the elimination of automobile delay and Level of Service (LOS) as the sole basis of determining CEQA impacts. The most recent CEQA guidelines, released in December 2018, recommend VMT as the most appropriate measure of project transportation impacts. However, SB 743 does not prevent a city or county from continuing to analyze delay or LOS outside of CEQA review as part of other transportation planning or analysis purposes (i.e., general plans, impact fee programs, corridor studies, congestion mitigation, or ongoing network monitoring); but these metrics may no longer constitute the sole basis for CEQA impacts. These guidelines provide technical direction regarding the assessment of VMT, thresholds of significance, and mitigation measures for land development and transportation projects within the City of Vallejo.

The City's General Plan 2040 establishes an advisory standard of LOS E or better, to be considered along with, but not override, metrics for pedestrian, bicycle, transit, and emergency access performance (General Plan Policy MTC-2.5). LOS can continue to be assessed relative to this standard during development review, to promote the city's interest in maintaining and operating a functional roadway network. However, assessment of a development project's effect on intersection level of service must be conducted outside the CEQA process. The assessment can be performed as part of a General Plan consistency assessment, within a separate traffic impact analysis document. Within the City of Vallejo, this is performed within a non-CEQA Traffic Impact Analysis per the guidelines on pages 1 through 8 of this document.

Congestion Management Program Compliance Changes

SB 743 contains amendments to current congestion management law that allows cities and counties to effectively opt-out of the LOS standards that would otherwise apply in areas where Congestion Management Programs (CMPs) are still used (see Government Code Sections 65088.1 and 65088.4). Solano County's Congestion Management Program was recently updated in September 2023. The CMP network in Vallejo includes I-80, SR 37, SR 29 (Sonoma Boulevard), Curtola Parkway, Mare Island Way, and Tennessee Street west of I-80. Three intersections are also monitored in the CMP: Tennessee Street/Sonoma Boulevard, Tennessee Street/Mare Island Way, and Curtola Parkway/Sonoma Boulevard. The LOS standard for these intersections is LOS E. The 2023 monitoring indicated all three intersections operated at LOS D or better.

VMT Analysis

For the purposes of SB 743 compliance, a VMT assessment should be conducted for land use projects. In general, VMT is an efficiency metric and should be normalized on a per capita basis relative to the number of residents, employees, or service population depending on the project type (service population is residents plus employees).Normalizing VMT per service population, resident, or employee essentially provides a transportation efficiency metric. Using an efficiency metric allows the analyst to compare the project to the city, region, or county, for purposes of identifying transportation impacts.

For the purposes of assessing significant impacts, the City of Vallejo has established the following standards of significance.

VMT Thresholds of Significance

The following are the City of Vallejo's thresholds of significance related to substantial additional VMT:

- For **residential projects**, a project would cause substantial additional VMT if it exceeds existing citywide household VMT per capita minus 15 percent.
- For **employment projects**, a project would cause substantial additional VMT if it exceeds the existing regionwide VMT per employee minus 15 percent.
- For **regional retail projects** a project would cause substantial additional VMT if it would increase net regional VMT.
- **Mixed-use projects** shall be divided into their individual constituent parts and evaluated against their individual components' standards.

Project VMT Screening

The State of California allows, and the City of Vallejo has adopted screening criteria that can be used to quickly assess if certain project types can be presumed to have a less than significant adverse impact relative to VMT. If a project or components of the project meet any of the adopted screening criteria, then it is presumed VMT impacts would be less than significant for the project or component of the project, and a detailed VMT analysis is not required. City staff can deny the use of screening criteria if substantial evidence suggests the project is not appropriate for screening. Projects meeting the screening criteria would not be subject to a VMT analysis for the purposes of the CEQA Transportation section; however, a project's effect on VMT, or the VMT generated by the project, would still be studied as part of the CEQA Air Quality, Greenhouse Gas, and/or Energy sections, as applicable.

The screening criteria are—in addition to other CEQA exemptions—unchanged by SB 743, including CEQA exemptions for projects consistent with an adopted General or Specific Plan (CEQA Guidelines §15183). Claiming a CEQA exemption on the basis of §15183 may carry additional legal risk in the post-SB 743 CEQA legal environment, especially if the EIR for the General Plan does not include an analysis of VMT; the city may choose to require an informational VMT analysis to prove that a project is consistent (on a VMT basis) with the land uses previously environmentally cleared as part of an adopted Specific Plan or General Plan. This approach is similar to the approach taken when CEQA Transportation section impacts were evaluated on the basis of delay and level of service, whereby a project applicant would be required to provide a trip generation memorandum prepared by a qualified consultant to demonstrate that a project adds a negligible number of trips to the roadway system.

Absent substantial evidence that the project in question might generate a potentially significant level of VMT, projects that meet at least one of the following screening criteria would be presumed to cause a less-than-significant VMT impact and would not require VMT analysis.

VMT Screening Criteria

The City of Vallejo has three key screening criteria for projects: project type, project location in a low VMT area, and project location near transit stations. A project only needs to meet one of the three screening criteria to "screen out." Projects that do not meet any of the identified screening criteria are required to conduct a detailed VMT assessment.

Screening Criteria 1: Project Type

Absent evidence indicating that a project would generate a potentially significant level of VMT, the following types of projects should be expected to cause a less-than-significant impact under CEQA and would not require further VMT analysis. Evidence indicating that a project may not be eligible to screen could include unusual or unique land use types or uses, site locations requiring atypical travel or other characteristics identified by city staff.

- Small Scale, Local-Serving Retail: Local-serving retail projects are defined as projects of less than or equal to 50,000 square feet in size on the basis that they attract trips that would otherwise travel longer distances. Local-serving retail generally improves the convenience of shopping and other activities close to home and has the effect of reducing vehicle travel.

- Transportation Projects Not Likely to Lead to Substantial Increase in Vehicle Travel: Screened transportation projects include

transit projects, bicycle and pedestrian projects, and roadway projects that do not result in vehicle capacity increase.

- Public Services: Police stations, fire stations, public utilities, and parks do not generally generate VMT. Instead, these land uses are often built in response to development from other land uses (e.g., office and residential). Therefore, these land uses can be presumed to have less-than-significant impacts on VMT. However, this presumption would not apply if the project is sited in a location that would require employees or visitors to travel substantial distances (such as locations on the outskirts of the city or sites requiring abnormal levels of vehicle travel), and the project is not located within one half-mile of a major transit stop or does not meet the small project screening criterion.

- Small Projects: Projects that generate very few trips per day can be reasonably expected to not generate significant impacts related to greenhouse gas emissions (GHG).

  According to findings from the CAPCOA's CEQA and climate change white paper (Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, CAPCOA, January 2008), small developments that generate less than 900 $MTCO_2$ per year are considered to have de minimis impact on GHG emissions.

  The CAPCOA screening level threshold of 900 $MTCO_2$ is more conservative than the level provided historically by BAAQMD. The CAPCOA threshold is in line with the post-2020 reduction goals established by SB 32. Thus, for the purposes of this assessment, the 900 $MTCO_2$ per year screening level was examined in accordance with CAPCOA guidance. The screening level does not indicate impact significance; rather, it is intended to screen out smaller projects that do not generate substantial amounts of GHG emissions, and it allows regulatory and discretionary actions to focus on more significant sources of GHG emissions. Projects that emit less than 900 $MTCO_2$ per year would likely not be considered cumulatively considerable and would not interfere with the ability of the state to achieve its GHG reduction targets.

METHODOLOGY TO DETERMINE SMALL PROJECT TRIP THRESHOLD

The methodology for applying the de minimis GHG emissions screening threshold to develop a locally applicable VMT screening threshold involves calculating how many daily residential or commercial trips would equate to the transportation-related GHG emissions of a local development whose total annual emissions would fall under the 900 $MTCO_2$ per year level. CARB estimated the on and off-site transportation-related emissions (including energy production for transportation) to be approximately 37% of regional GHG emissions.[2] Therefore, the transportation component of a development's total emissions falling under the screening threshold would be 333 $MTCO_2$ per year.

The methodology estimates the annual GHG emissions from a given number of daily vehicle trips as the sum of vehicle starting emissions and vehicle running emissions, multiplied by an annualization factor. The vehicle starting emissions are proportional to the daily vehicle trips and the vehicle running emissions are proportional to the daily VMT, both of which are obtained from the Solano Napa Activity Based Model (SNBAM), which is locally approved and calibrated. Parameters from the California Emissions Estimator Model

[2] California Air Resources Board (November 2025). https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-2000_2023_ghg_inventory_trends.pdf

(CalEEMod) Version 2020.4.0 informed the conversion of vehicle trips and VMT to CO_2-equivalent emissions.[3] Analysis of countywide StreetLight data resulted in a VMT annualization factor of 353.

Figure 1 illustrates the subareas by which small project VMT screening should be conducted. These areas were developed through multiple runs of the SNBAM to assess geographic areas and boundaries that represent land uses with comparable and analogous travel behavior.

Table 1 shows the maximum daily residential or commercial trips that generate annual GHG emissions falling under the 333 $MTCO_2$ per year threshold, for each subarea. Developments that generate fewer daily trips than those presented in the table as the threshold can be "screened out" and presumed to have a less than significant impact on VMT.

The thresholds differ by subarea based on the average trip distance for household and employee trips. Some geographic subareas are more VMT efficient than others. **Table 2** provides more detailed information for each area.

Table 1. Small Project VMT Screening Criteria

Subarea	Daily Residential Trips[1]	Daily Employment Trips[1]
One	300	220
Two	310	180
Three	300	230
Four	330	200
Five	300	220
Six	250	110
Seven	280	200
Citywide	300	190

Source: SNABM and Fehr & Peers.
[1] Value is rounded down to the nearest 10.

EXAMPLE OF SMALL PROJECT SCREENING CRITERIA USE

To assess if a project falls below the City's small project screening criteria, an analyst would first calculate the number of daily trips that the development would generate. Then the analyst would locate the project site on **Figure 1** and compare the daily trip calculation to the values in **Table 1**. As an example, a residential project in Subarea 6 would be screened out if it generated less than 250 daily trips.

[3] CAPCOA (2021). Appendix D: Default Data Tables. https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12.

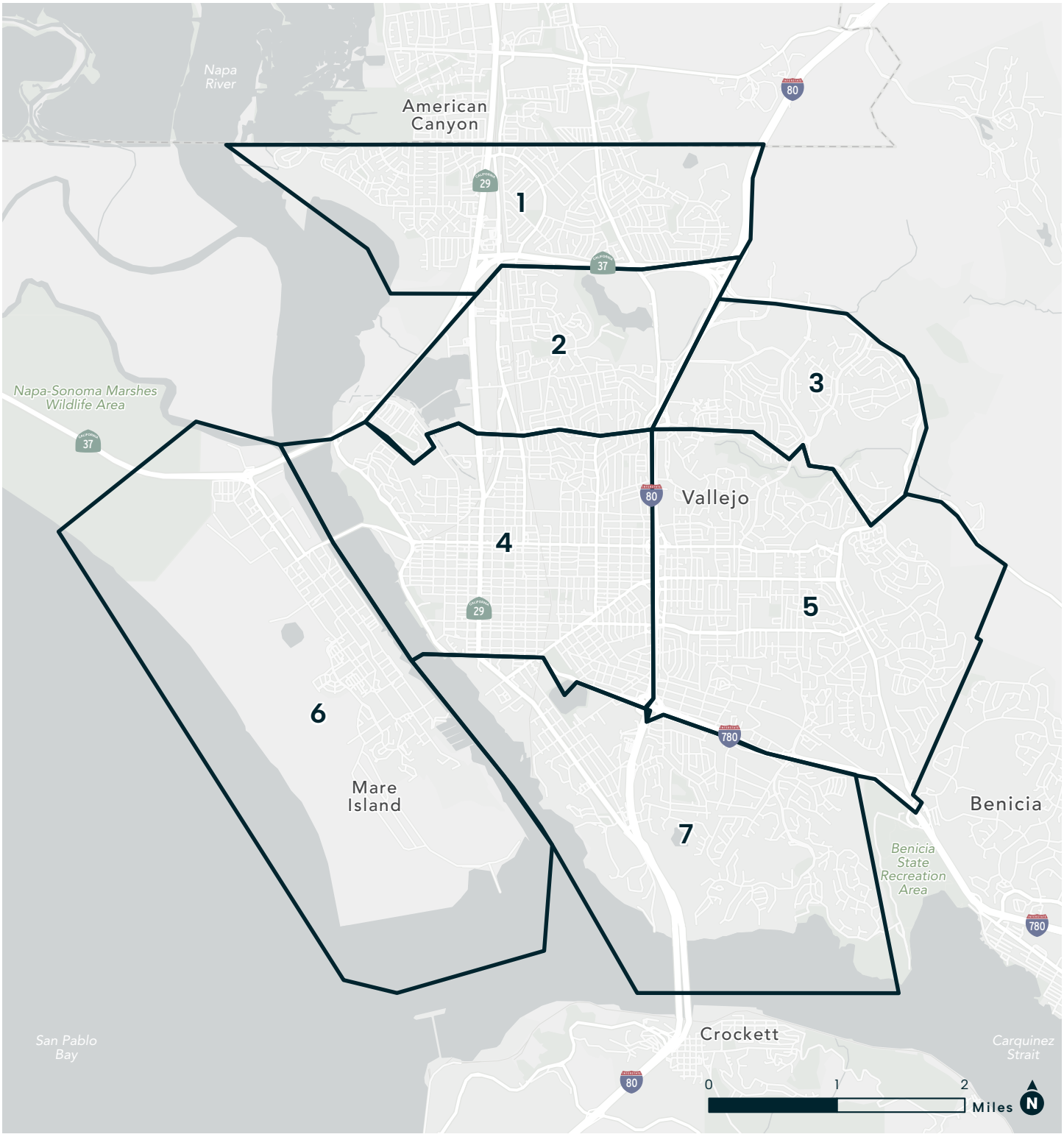


FIGURE 1

VMT Screening Subareas

Table 2: Small Project ADT Screening Thresholds

Area One: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,684.2	216,003,726	216.0
250	2,105.2	270,004,658	270.0
300	2,526.2	324,005,589	324.0
305	2,568.4	329,405,683	329.4
350	2,947.3	378,006,521	378.0
400	3,368.3	432,007,453	432.0
450	3,789.4	486,008,384	486.0
500	4,210.4	540,009,316	540.0
550	4,631.5	594,010,247	594.0
600	5,052.5	648,011,179	648.0
650	5,473.5	702,012,110	702.0
676	5,692.5	730,092,595	730.1
700	5,894.6	756,013,042	756.0
750	6,315.6	810,013,974	810.0
800	6,736.7	864,014,905	864.0
850	7,157.7	918,015,837	918.0
900	7,578.7	972,016,768	972.0

Average trip distance: 8.42 miles

Area One: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,342.1	298,357,059	298.4
223	2,611.5	332,668,121	332.7
250	2,927.7	372,946,324	372.9
300	3,513.2	447,535,588	447.5
350	4,098.7	522,124,853	522.1
400	4,684.3	596,714,118	596.7
450	5,269.8	671,303,382	671.3
500	5,855.3	745,892,647	745.9
550	6,440.9	820,481,912	820.5
600	7,026.4	895,071,176	895.1
650	7,611.9	969,660,441	969.7
676	7,916.4	1,008,446,859	1008.4
700	8,197.5	1,044,249,706	1044.2
750	8,783.0	1,118,838,971	1118.8
800	9,368.5	1,193,428,235	1193.4
850	9,954.1	1,268,017,500	1268.0
900	10,539.6	1,342,606,765	1342.6

Average trip distance: 11.71 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Two: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,635.0	209,852,939	209.9
250	2,043.8	262,316,174	262.3
300	2,452.5	314,779,409	314.8
316	2,583.3	331,567,644	331.6
333	2,722.3	349,405,144	349.4
400	3,270.0	419,705,878	419.7
450	3,678.8	472,169,113	472.2
500	4,087.6	524,632,348	524.6
550	4,496.3	577,095,583	577.1
600	4,905.1	629,558,817	629.6
650	5,313.8	682,022,052	682.0
676	5,526.4	709,302,934	709.3
700	5,722.6	734,485,287	734.5
750	6,131.3	786,948,522	786.9
800	6,540.1	839,411,756	839.4
850	6,948.8	891,874,991	891.9
900	7,357.6	944,338,226	944.3

Average trip distance: 8.18 miles

Area Two: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
188	2,620.3	332,861,786	332.9
200	2,787.6	354,108,284	354.1
250	3,484.5	442,635,354	442.6
300	4,181.3	531,162,425	531.2
350	4,878.2	619,689,496	619.7
400	5,575.1	708,216,567	708.2
450	6,272.0	796,743,638	796.7
500	6,968.9	885,270,709	885.3
550	7,665.8	973,797,780	973.8
600	8,362.7	1,062,324,851	1062.3
650	9,059.6	1,150,851,921	1150.9
676	9,422.0	1,196,885,998	1196.9
700	9,756.5	1,239,378,992	1239.4
750	10,453.4	1,327,906,063	1327.9
800	11,150.2	1,416,433,134	1416.4
850	11,847.1	1,504,960,205	1505.0
900	12,544.0	1,593,487,276	1593.5

Average trip distance: 13.94 miles

Annualization factor for VMT: 353

Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]

Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]

[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Three: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,691.0	216,859,636	216.9
250	2,113.8	271,074,545	271.1
300	2,536.5	325,289,454	325.3
307	2,595.7	332,879,541	332.9
350	2,959.3	379,504,363	379.5
400	3,382.0	433,719,272	433.7
450	3,804.8	487,934,181	487.9
500	4,227.5	542,149,090	542.1
550	4,650.3	596,363,999	596.4
600	5,073.0	650,578,908	650.6
650	5,495.8	704,793,817	704.8
676	5,715.6	732,985,570	733.0
700	5,918.5	759,008,726	759.0
750	6,341.3	813,223,636	813.2
800	6,764.0	867,438,545	867.4
850	7,186.8	921,653,454	921.7
900	7,609.5	975,868,363	975.9

Average trip distance: 8.46 miles

Area Three: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,213.9	282,309,211	282.3
235	2,601.4	331,713,323	331.7
250	2,767.4	352,886,514	352.9
300	3,320.9	423,463,817	423.5
350	3,874.4	494,041,119	494.0
400	4,427.8	564,618,422	564.6
450	4,981.3	635,195,725	635.2
500	5,534.8	705,773,028	705.8
550	6,088.3	776,350,331	776.4
600	6,641.8	846,927,633	846.9
650	7,195.2	917,504,936	917.5
676	7,483.0	954,205,134	954.2
700	7,748.7	988,082,239	988.1
750	8,302.2	1,058,659,542	1058.7
800	8,855.7	1,129,236,844	1129.2
850	9,409.2	1,199,814,147	1199.8
900	9,962.6	1,270,391,450	1270.4

Average trip distance: 11.07 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Four: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,551.6	199,405,871	199.4
250	1,939.4	249,257,339	249.3
300	2,327.3	299,108,806	299.1
333	2,583.3	332,010,775	332.0
350	2,715.2	348,960,274	349.0
400	3,103.1	398,811,742	398.8
450	3,491.0	448,663,210	448.7
500	3,878.9	498,514,677	498.5
550	4,266.8	548,366,145	548.4
600	4,654.7	598,217,613	598.2
650	5,042.6	648,069,081	648.1
676	5,244.3	673,991,844	674.0
700	5,430.4	697,920,548	697.9
750	5,818.3	747,772,016	747.8
800	6,206.2	797,623,484	797.6
850	6,594.1	847,474,951	847.5
900	6,982.0	897,326,419	897.3

Average trip distance: 7.76 miles

Area Four: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,539.0	322,995,804	323.0
206	2,615.2	332,685,678	332.7
250	3,173.7	403,744,755	403.7
300	3,808.5	484,493,706	484.5
350	4,443.2	565,242,657	565.2
400	5,078.0	645,991,608	646.0
450	5,712.7	726,740,559	726.7
500	6,347.5	807,489,510	807.5
550	6,982.2	888,238,461	888.2
600	7,617.0	968,987,411	969.0
650	8,251.7	1,049,736,362	1049.7
676	8,581.8	1,091,725,817	1091.7
700	8,886.5	1,130,485,313	1130.5
750	9,521.2	1,211,234,264	1211.2
800	10,155.9	1,291,983,215	1292.0
850	10,790.7	1,372,732,166	1372.7
900	11,425.4	1,453,481,117	1453.5

Average trip distance: 12.96 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Five: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,678.1	215,246,956	215.2
250	2,097.6	269,058,695	269.1
300	2,517.2	322,870,434	322.9
309	2,592.7	332,556,547	332.6
350	2,936.7	376,682,173	376.7
400	3,356.2	430,493,912	430.5
450	3,775.8	484,305,651	484.3
500	4,195.3	538,117,390	538.1
550	4,614.8	591,929,129	591.9
600	5,034.4	645,740,868	645.7
650	5,453.9	699,552,607	699.6
676	5,672.0	727,534,711	727.5
700	5,873.4	753,364,346	753.4
750	6,292.9	807,176,085	807.2
800	6,712.5	860,987,824	861.0
850	7,132.0	914,799,563	914.8
900	7,551.5	968,611,302	968.6

Average trip distance: 8.39 miles

Area Five: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,323.7	296,049,707	296.0
224	2,602.5	331,575,671	331.6
250	2,904.6	370,062,133	370.1
300	3,485.5	444,074,560	444.1
350	4,066.5	518,086,987	518.1
400	4,647.4	592,099,413	592.1
450	5,228.3	666,111,840	666.1
500	5,809.2	740,124,266	740.1
550	6,390.2	814,136,693	814.1
600	6,971.1	888,149,120	888.1
650	7,552.0	962,161,546	962.2
676	7,854.1	1,000,648,008	1000.6
700	8,132.9	1,036,173,973	1036.2
750	8,713.9	1,110,186,400	1110.2
800	9,294.8	1,184,198,826	1184.2
850	9,875.7	1,258,211,253	1258.2
900	10,456.6	1,332,223,680	1332.2

Average trip distance: 11.62 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Six: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,077.4	260,167,456	260.2
250	2,596.8	325,209,320	325.2
255	2,648.7	331,713,506	331.7
300	3,116.1	390,251,184	390.3
350	3,635.5	455,293,048	455.3
400	4,154.8	520,334,912	520.3
450	4,674.2	585,376,776	585.4
500	5,193.5	650,418,640	650.4
550	5,712.9	715,460,504	715.5
600	6,232.2	780,502,368	780.5
650	6,751.6	845,544,232	845.5
676	7,021.6	879,366,001	879.4
700	7,270.9	910,586,096	910.6
750	7,790.3	975,627,960	975.6
800	8,309.6	1,040,669,824	1040.7
850	8,829.0	1,105,711,688	1105.7
900	9,348.3	1,170,753,552	1170.8

Average trip distance: 10.39 miles

Area Six: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
118	2,654.5	332,440,545	332.4
200	4,499.1	563,458,550	563.5
250	5,623.9	704,323,188	704.3
300	6,748.7	845,187,825	845.2
350	7,873.5	986,052,463	986.1
400	8,998.3	1,126,917,100	1126.9
450	10,123.1	1,267,781,738	1267.8
500	11,247.8	1,408,646,375	1408.6
550	12,372.6	1,549,511,013	1549.5
600	13,497.4	1,690,375,650	1690.4
650	14,622.2	1,831,240,288	1831.2
676	15,207.1	1,904,489,899	1904.5
700	15,747.0	1,972,104,925	1972.1
750	16,871.8	2,112,969,563	2113.0
800	17,996.6	2,253,834,200	2253.8
850	19,121.3	2,394,698,838	2394.7
900	20,246.1	2,535,563,475	2535.6

Average trip distance: 22.50 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Area Seven: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,824.0	233,524,367	233.5
250	2,280.0	291,905,458	291.9
285	2,599.1	332,772,223	332.8
300	2,735.9	350,286,550	350.3
350	3,191.9	408,667,642	408.7
400	3,647.9	467,048,734	467.0
500	4,559.9	583,810,917	583.8
550	5,015.9	642,192,009	642.2
600	5,471.9	700,573,100	700.6
650	5,927.9	758,954,192	759.0
676	6,165.0	789,312,360	789.3
700	6,383.9	817,335,284	817.3
750	6,839.9	875,716,375	875.7
800	7,295.9	934,097,467	934.1
850	7,751.8	992,478,559	992.5
900	8,207.8	1,050,859,650	1050.9

Average trip distance: 9.12 miles

Area Seven: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	2,522.3	320,929,482	320.9
207	2,610.6	332,162,013	332.2
250	3,152.9	401,161,852	401.2
300	3,783.4	481,394,222	481.4
350	4,414.0	561,626,593	561.6
400	5,044.6	641,858,963	641.9
500	6,305.7	802,323,704	802.3
550	6,936.3	882,556,075	882.6
600	7,566.9	962,788,445	962.8
650	8,197.4	1,043,020,815	1043.0
676	8,525.3	1,084,741,648	1084.7
700	8,828.0	1,123,253,186	1123.3
750	9,458.6	1,203,485,556	1203.5
800	10,089.2	1,283,717,927	1283.7
850	10,719.7	1,363,950,297	1364.0
900	11,350.3	1,444,182,667	1444.2

Average trip distance: 13.33 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Citywide: Residential			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
200	1,708.8	219,104,449	219.1
250	2,135.9	273,880,562	273.9
300	2,563.1	328,656,674	328.7
303	2,588.8	331,943,241	331.9
350	2,990.3	383,432,787	383.4
400	3,417.5	438,208,899	438.2
500	4,271.9	547,761,124	547.8
550	4,699.1	602,537,236	602.5
600	5,126.3	657,313,348	657.3
650	5,553.5	712,089,461	712.1
676	5,775.6	740,573,039	740.6
700	5,980.6	766,865,573	766.9
750	6,407.8	821,641,685	821.6
800	6,835.0	876,417,798	876.4
850	7,262.2	931,193,910	931.2
900	7,689.4	985,970,022	986.0

Average trip distance: 8.54 miles

Citywide: Employment			
Veh. trips/day (HB VT)	VMT/day (HB VMT)	CO_2 Eq.	
		g/year	MT/year
196	2,612.7	332,138,189	332.1
200	2,666.0	338,916,519	338.9
250	3,332.5	423,645,649	423.6
300	3,999.0	508,374,778	508.4
350	4,665.5	593,103,908	593.1
400	5,332.0	677,833,038	677.8
500	6,665.0	847,291,297	847.3
550	7,331.5	932,020,427	932.0
600	7,998.0	1,016,749,557	1016.7
650	8,664.5	1,101,478,687	1101.5
676	9,011.1	1,145,537,834	1145.5
700	9,331.0	1,186,207,816	1186.2
750	9,997.5	1,270,936,946	1270.9
800	10,664.0	1,355,666,076	1355.7
850	11,330.5	1,440,395,206	1440.4
900	11,997.0	1,525,124,335	1525.1

Average trip distance: 13.33 miles

Annualization factor for VMT: 353
Yolo/Solano AQMD 2026 Annual CO_2 Running for LDA (g/VMT): 354.57 [1]
Yolo/Solano AQMD 2026 Annual CO_2 Starting for LDA (g/VT):73.77 [1]
[1] https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf?sfvrsn=12

Screening Criteria 2: Low VMT Area Screening

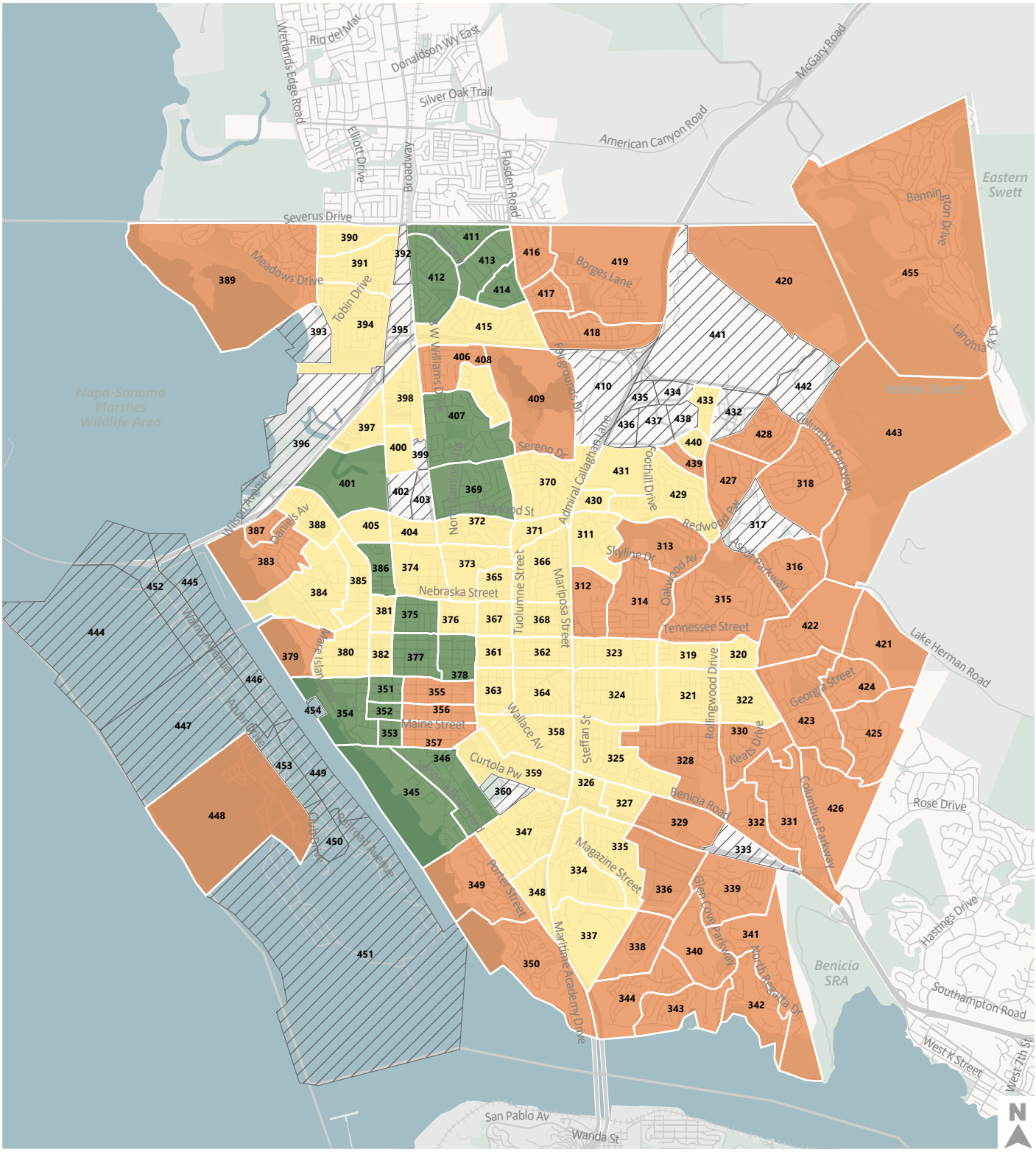
Residential and employment-generating projects located within a low VMT generating area of the city may be presumed to have a less than significant impact absent substantial evidence to the contrary. For this screening, Solano–Napa County Activity Based Travel Demand Model shall be used to compare the project's characteristics to land uses currently in the low-VMT area and for individual traffic analysis zones (TAZs). TAZs are geographic polygons (like census block groups) used to represent areas of homogenous travel behavior. For the low VMT area screening criterion to be satisfied, the analyst must verify that the project land uses would not alter the existing built environment in such a way as to increase the rate or length of vehicle trips (e.g., the proposed project is consistent with existing land use in the area, the project would be expected to contribute VMT consistent with existing land use in the area, and the project would not significantly alter travel patterns in the area).

A low VMT area is defined as follows:

- For housing projects: TAZs that have a baseline home-based VMT per capita that is 85 percent or less of the existing citywide average.
- For employment-generating projects: TAZs that have baseline home-work VMT per worker that is 85 percent or less of the existing regionwide average.

To determine if a project is in a low VMT-generating area, the analyst may review the screening maps provided as **Figure 2** (residential project mapping) and **Figure 3** (employment-generating project mapping). Projects located in TAZs that are 15 percent below the relevant threshold (indicated in green on Figure 2 and Figure 3) can be presumed to have a less than significant impact.

Additionally, as noted above, the analyst must identify if the project is consistent with the General Plan land use designation(s) and zoning district(s) within that TAZ (e.g., if the project is proposing single-family housing, there should be existing single-family housing of approximately the same density) and use professional judgement to confirm that there is nothing unique about the project that would otherwise be misrepresented utilizing the data from the travel demand model.



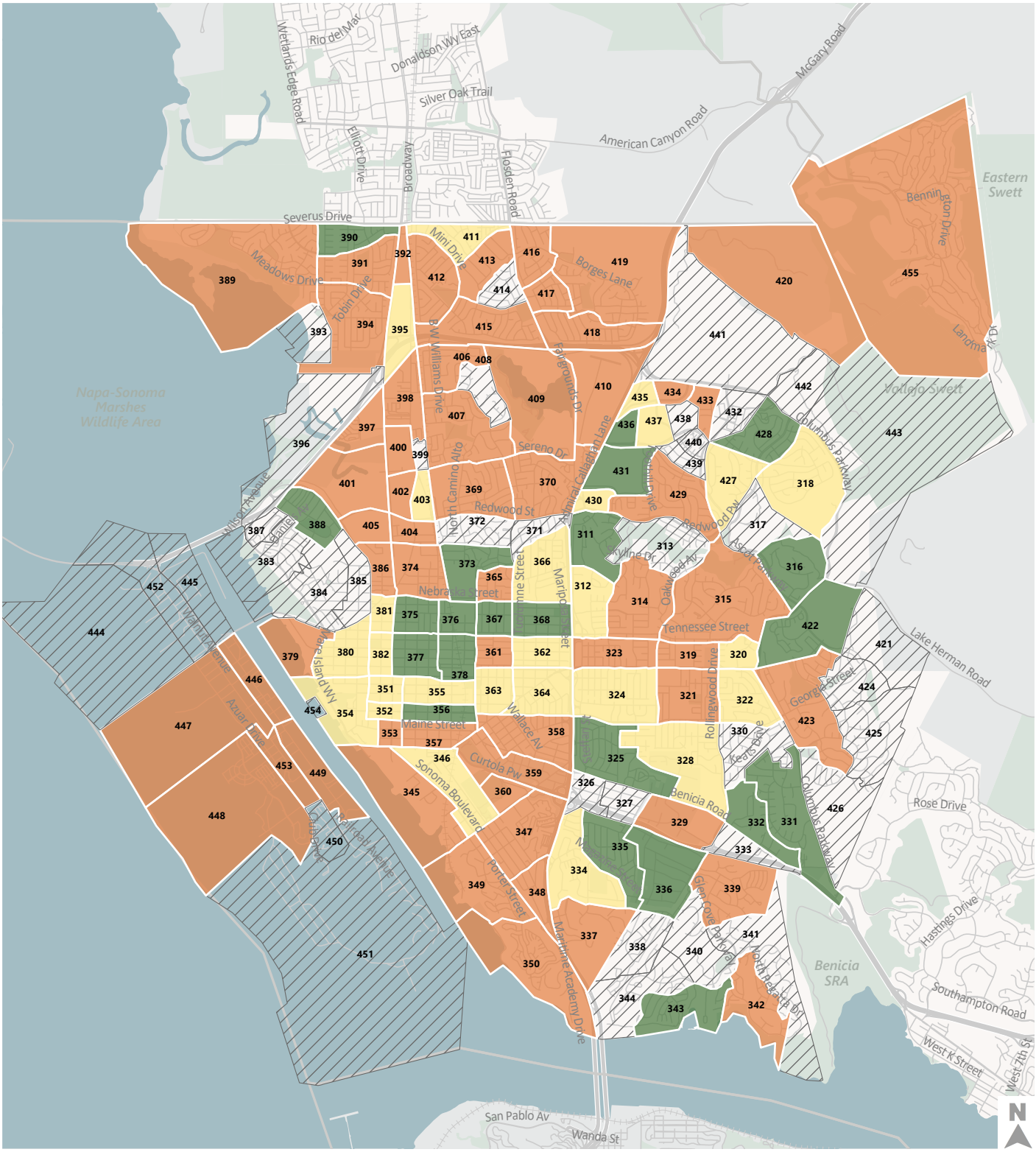
Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2024)

Vallejo City Average: 24.6

- 15% below Vallejo City average
- Between 15%-0% below Vallejo City average
- Above Vallejo City average
- TAZ with no (or very low) population
- ### TAZ ID

Figure 2

City of Vallejo
2025 Residential VMT Per Resident Compared to Citywide Average



Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2024)

Bay Area Average: 19.9

- 15% below Bay Area average
- Between 15%-0% below Bay Area average
- Above Bay Area average
- TAZ with no (or very low) employment
- ### TAZ ID

Figure 3

City of Vallejo
2025 Work Tour VMT Per Employee Compared to Bay Area Regional Average

Screening Criteria 3: Proximity to Transit

Projects located within a Transit Priority Area (TPA)[4] may be presumed to have a less than significant impact, absent substantial evidence to the contrary. This includes residential, retail, office projects, or mixed-use projects proposed within one half mile of an existing major transit stop or an existing stop along a high-quality transit corridor. In Vallejo, the Downtown and Mare Island Ferry Terminals are currently considered major transit stops (July 2026). This presumption would not apply, however, if project-specific or location-specific information indicates the project will still generate significant levels of VMT. For example, the presumption might not be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than the maximum allowed by the city (if the city requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy/Plan Bay Area 2050;
4. Replaces existing deed-restricted affordable residential units with a smaller number of moderate- or high-income residential units; or
5. Has a retail component greater than 50,000 square feet.

Projects in proximity to an existing major transit stop or an existing stop along a high-quality transit corridor that do not satisfy all these criteria shall prepare a detailed VMT analysis. At the time of the preparation of these guidelines no transit lines within the city qualified as high quality transit corridors. However, transit lines and bus schedules are dynamic and change in response to demand and funding levels. Current transit service levels should be reviewed at the time of a project's application is deemed complete or a project's Notice of Preparation (NOP) to determine if this screening criteria is satisfied.

VMT Assessment for Non-Screened Development

Projects not screened through the steps above should prepare a complete VMT analysis and forecasting through SNABM to determine if they have a significant VMT impact. This analysis shall include "projected generated

[4] A TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per the definitions below. The city measures the half mile based on actual walking routes. Academic research has demonstrated that walking distance is an important factor that influences the choice to take transit and thereby reduce VMT. For more background on this, see the following article: http://www.reconnectingamerica.org/assets/Uploads/20111018UCB-ITS-VWP-2011-5.pdf).

Pub. Resources Code, § 21064.3 – 'Major transit stop' means 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 service interval of 20 minutes or less during the morning and afternoon peak commute periods.' Note that this requirement means that both intersecting routes must have the 20-minute or less frequency of service interval.

Pub. Resources Code, § 21155 – For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

VMT" and "project effect VMT" estimates for the project TAZ(s) under the following scenarios:

- **Baseline Conditions** – This data is available from the SNABM travel demand model; analysts should use caution to ensure the calculated baseline values reflect values at the time the Notice of Preparation for a project was released (consistent with guidance from LCI). The screening maps also provide the baseline VMT per capita in the City of Vallejo.
- **Baseline Plus Project** – The project land use would be added to the project TAZ, or a separate TAZ would be created to contain the project land uses. A full base year model run would be performed and VMT changes must be isolated for the project TAZ and across the full model network. The model output must include reasonableness checks of the production and attraction balancing to ensure the project effect is accurately captured. If this scenario results in a less-than-significant impact, then additional cumulative scenario analysis may not be required.

The results of the project's VMT analysis conducted as part of the Baseline Plus Project model evaluation should be compared against the relevant significance criteria presented above. 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. Additional details on VMT mitigation are presented in the section below. CEQA requires that all feasible measures be implemented to reduce identified impacts to less-than-significant levels. Projects that are unable to mitigate their project-specific VMT impacts to less-than-significant levels require a Cumulative VMT analysis.

The flowchart on the next page details the step-by-step methodology for assessing VMT impacts, including the cumulative evaluation.

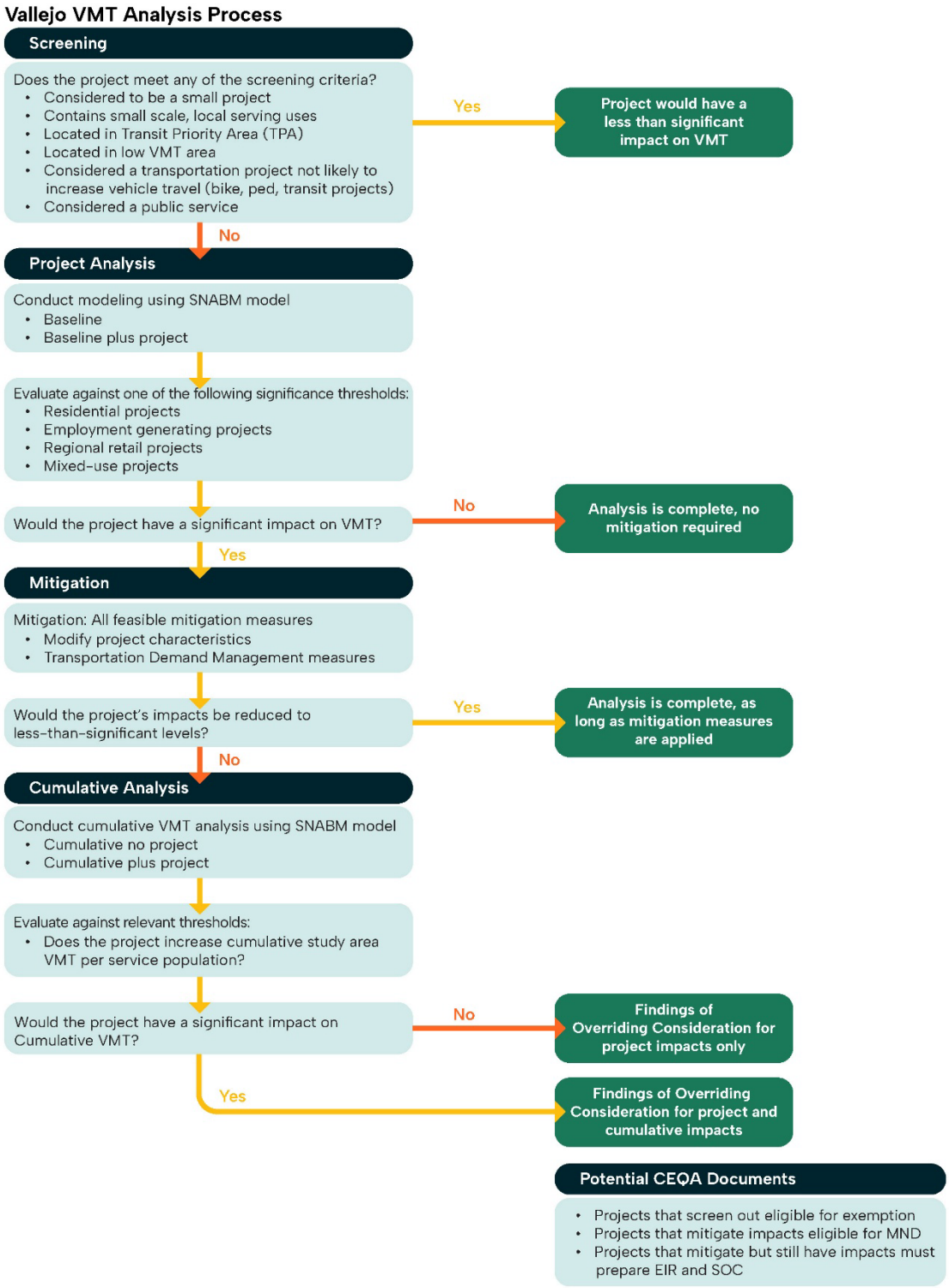
Cumulative Analysis

The cumulative analysis of a project involves understanding the project's effect on overall VMT within its study area. This analysis is needed to address circumstances where an individual project might affect travel patterns from other developments in the broader area; this might happen for a variety of reasons, such as that the project offers different housing, employment or other opportunities than would otherwise exist in the area and that causes other users to change their travel decisions, or because the drivers and transit users generated by the project take up available system capacity and cause other users to change their travel routes or modes. The cumulative analysis shall identify the project's effect on overall VMT within the study area under the following scenarios:

- **Cumulative No Project**– This data is available from the SNABM travel demand model. The recommended cumulative year is the horizon year of the current SNABM (currently 2040), but should be confirmed with City staff prior to beginning the analysis.
- **Cumulative Plus Project** – The project land use would either be added to the project TAZ, or a separate TAZ would be created to contain the project land uses. The addition of project land uses may need to be accompanied by a reallocation of a similar amount of land use from other TAZs; especially if the proposed project is significant in size such that it could change other future developments. Land use projects are often represented in the assumed growth of the cumulative year population and employment. It may be appropriate to remove land use growth that represents the project from the cumulative year model to represent the cumulative no project scenario. If project land uses are simply added to the cumulative no project scenario, then the analysis should reflect this limitation in the methodology and

acknowledge that the analysis may overestimate the project's effect on VMT.

The model output should include total VMT, which includes all vehicle trips and trip purposes, and VMT per service population (population plus employment), home-based VMT per resident for residential, and home-based work VMT per worker for employment uses. Total VMT (by speed bin, which documents how total VMT occurs across various travel speeds) is a required input for air quality, greenhouse gas (GHG), and energy impact analysis while total VMT per service



population is recommended for the CEQA transportation impact assessment.

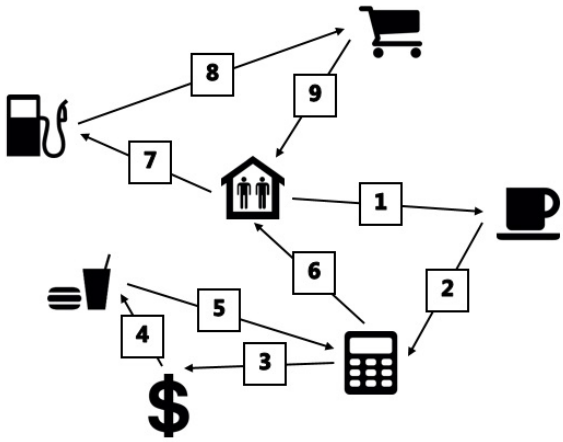
The project's effect on VMT should be measured by defining a VMT study area and calculating the total VMT occurring on all network links inside that study area, in both the cumulative no project and cumulative plus project scenarios. To allow for a reasonable comparison between those two scenarios, the total study area VMT should be normalized in some fashion to reflect that there are different numbers of people within the study area (i.e., because the project has added people to the study area as compared to the no project scenario). If the project adds residents to the study area, then it would be reasonable to present the VMT results as total study area VMT divided by number of study area residents. If the project adds employees to the study area, then it would be reasonable to use total study area VMT divided by number of study area employees. The exact method for normalizing the VMT number is not critical; what is essential is that the same method be used for both the cumulative no project and the cumulative plus project scenarios, to allow for an apples-to-apples comparison between the two scenarios.

- **Cumulative Significance Threshold –** Cumulative VMT impacts should be considered significant if there is a net increase in the total study area VMT normalized to the number of people within the study area, when comparing cumulative no project to cumulative plus project conditions.

Detailed VMT Forecasting Information (SNABM)

Travel demand models generate daily person trip-ends for each TAZ across various trip purposes (Home-Based-Work, Home-Based-Other, and Non-Home-Based, for example) based on population, household, and employment variables. Travel demand models are simplifications of reality and as such, TAZs often contain a large amount of population, households, and employment. Travel models do not tie trip generation to individual land uses but instead aggregate them all up to the TAZ level. This can create challenges for complying with the SB 743 guidance because the thresholds are tied to specific land use categories and their behavior. The following methodology addresses this particular challenge.

To better understand the trips used in each metric, consider the following daily vehicle trip tour for an individual residential worker in a given TAZ. Note that each TAZ would have many individual residential workers and thus the calculations would be a sum of these individual calculations:



These nine daily vehicle trips include a variety of trip purposes: home-based work (HBW), home-based other (HBO), work-based other (WBO), and other-based other (OBO). WBO and OBO trips are often grouped into a non-home based (NHB) category. The table below categorizes the nine daily trips into trip purposes.

Trip	Tour	Origin	Destination	Purpose	Distance
1	Work	Residence	Coffee Shop	HBO	2 miles
2	Work	Coffee Shop	Work	WBO (NHB)	10 miles
3	Work	Work	ATM	WBO (NHB)	1 mile
4	Work	ATM	Sandwich Shop	OBO (NHB)	1 mile
5	Work	Sandwich Shop	Work	WBO (NHB)	1 mile
6	Work	Work	Residence	HBW	11 miles
7	Home	Residence	Gas Station	HBO	3 miles
8	Home	Gas Station	Grocery Store	OBO (NHB)	1 mile
9	Home	Grocery Store	Residence	HBO	2 miles

SNABM is an activity-based model that links an individual's trips into "tours." Therefore, it is straightforward to calculated VMT associated with residential or work locations based on the type of "tour." The table below describes the calculation for the partial VMT metrics.

Description	Trips	VMT	Comments
Residential Tour	1-9	32 miles	Includes all trips by a resident
Home-Work Tour	1, 2, 6	23 miles	Includes all trips part of a home-work tour

The Total VMT calculation (all trip purposes for both resident and worker) is more easily calculated using the final origin-destination vehicle matrices and summing all origin and destination trip ends for each TAZ. The Total VMT calculation includes all trips, all trip purposes, for any interaction with the TAZ regardless of whether they are a resident or worker of the TAZ.

Each of these metrics needs to be adjusted to account for the length of trips that get truncated at the travel model boundary.

Adjusting the length of trips leaving a model boundary requires appending extra distance at the model gateway zone (or external centroid) connector based on calculations from a parent travel demand model, such as the California Statewide Travel Demand Model (CSTDM). This process results in new gateway distances that are weighted based on the amount and location of external travel origins and destinations. The calculations would need to address the distance of trips outside the travel model boundary; in the case of SNABM, this is the nine-county Bay Area.

Detailed VMT Calculation Instructions

The following outlines the process used to estimate City of Vallejo VMT Metrics via SNABM.

1. Adapted MTC's "Core Summaries" R script that was used for MTC Travel Model 1 to work for SNABM (script available upon request). The script takes approximately 5-15 minutes to run after a complete SNABM model run and summarizes the large trip and tour list files used in SNABM for use in further VMT summaries

2. Output of script is collection of files in new "core_summaries" and "updated_output" folders within model scenario folder (see below)

3. The files needed to calculate Residential and Office/Employment VMT metrics are the following:

    a. AutoTripsVMT_personHome.csv – summarizes population for each TAZ as output from the population synthesizer

    b. AutoTripsVMT_perHome.csv – summarizes all VMT made by resident tied back to residence TAZ, sorted by tour purpose and trip purpose

    c. AutoTripsVMT_personsWork.csv – summarizes workers/employees for each TAZ as output from the population synthesizer

    d. AutoTripsVMT_perwork.csv – summarizes all VMT made by workers tied back to workplace TAZ, sorted by tour purpose and trip purpose. Note that WorkLocation = 0 means VMT made by non-workers

4. Summarizing Residential VMT Metric

    a. Defined as all trips/VMT by resident traced back to the residence location

    b. To summarize by TAZ: sum of all VMT records on 'AutoTripsVMT_perHome.csv' by TAZ divided by sum of all population records on 'AutoTripsVMT_personsHome.csv' by TAZ

    c. To summarize by jurisdiction (place/county/etc.): sum of all VMT records on 'AutoTripsVMT_perHome.csv' by TAZs corresponding to jurisdiction divided by sum of all population records on 'AutoTripsVMT_personHome.csv' by TAZs corresponding to jurisdiction

    d. To summarize by region: same process described above for jurisdiction, but including all TAZs in Bay Area counties

5. Summarizing Office/Employment VMT Metric

    a. Defined as all trips part of home-work tour traced back to the workplace location

    b. To summarize by TAZ: sum of VMT records with home-work tour purposes (see below) on 'AutoTripsVMT_perWork.csv' by TAZ divided by sum of all worker records on 'AutoTrips_VMT_personsWork.csv' by TAZ

    c. Home-work tour purposes defined as 'work_low,' 'work_med,' 'work high,' and 'work_very_high'

    d. To summarize by jurisdiction (place/county/etc.): sum of VMT records with home-work tour purposes (see below) on 'AutoTripsVMT_perWork.csv' by TAZs corresponding to jurisdiction divided by sum of all worker records on 'AutoTrips_VMT_personsWork.csv' by TAZs corresponding to jurisdiction

    e. To summarize by region: same process described above for jurisdiction, but including all TAZs in Bay Area counties

6. Adjust VMT metrics to account for length of trips that get truncated at travel model boundary

    a. Run the California Statewide Travel Demand Model (CSTDM) to estimate amount of extra distance to append to trips leaving the SNABM model area

    b. Select zone of SNABM model area zones within CSTDM and calculation of trip lengths outside of SNABM model area for internal-external (IX)/ external-internal (XI) trips by gateway.

    c. Apply this average extra distance by gateway to SNABM model estimate of IX/XI trips and summarize "extra" VMT per TAZ (on top of the VMT already summarized within the model boundaries)

        i. Thus, TAZs with more IX/XI trips (e.g., near a model boundary) would

take on more extra distance than a TAZ with fewer IX/XI trips (e.g., within the core Bay Area)

d. End product is "extra" VMT to add to the VMT metrics calculated in previous steps

VMT Mitigation Measures

To mitigate VMT impacts, the following general choices are available to development projects:

- Modify the project's design features and/or land uses to reduce project trips or reduce trip length.
- Moving the proposed development to a more travel-efficient area (i.e., area with access to high-quality transit, or other transportation solutions that reduce the length/number of trips).
- Implement Transportation Demand Management (TDM) measures to reduce VMT generated by the project.

Of the strategies included within these general categories, only a subset of the strategies is likely to be effective in a suburban setting such as Vallejo. Proposed projects shall utilize the latest version of the California Air Pollution Control Officers Association ("CAPCOA") Quantifying Greenhouse Gas Mitigation Measures document to estimate the maximum feasible VMT mitigation. However, it should be noted that most of the data used to develop the CAPCOA mitigation strategies are based on projects from urban or relatively dense suburban areas. The effectiveness of VMT mitigations will vary from project to project based on the surrounding land use context, the combination of its uses, and the availability of alternative transportation modes. The proposed project's transportation impact analysis must quantifiably demonstrate, through the use of reliable calculation tools, that proposed VMT mitigations will result in the estimated reductions when applied to the project. In the event a proposed project's characteristics render most or all the aforementioned mitigation strategies infeasible or ineffective, city staff will consider other mitigation options.

The following VMT mitigation strategies may be considered by projects for the mitigation of VMT impacts within the city. The numbering and titling of the mitigation measures, along with the maximum effectiveness, are taken from the CAPCOA *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Final Draft*, October 2024.

Land Use

T-1: Increase Residential Density – This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of dwelling units (du) compared to the average residential density in the U.S. Increased densities affect the distance people travel and provide greater options for the mode of travel they choose. Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in GHG emissions. This measure is best quantified when applied to larger developments and developments where the density is somewhat similar to the surrounding area due to the underlying research being founded in data from the neighborhood level.

T-2: Increase Job Density – This measure accounts for the VMT reduction achieved by a project designed with a higher density of jobs compared to the average job density in the U.S. Increased job densities affect the distance people travel and provide greater options for the mode of travel they choose. Increasing job density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in GHG emissions.

T-3: Provide Transit-Oriented Development – This measure would reduce project VMT in the

study area relative to the same project sited in a non-transit-oriented development (TOD) location. TOD refers to projects built in compact, walkable areas with easy access to public transit, ideally in a location containing a mix of uses including housing, retail offices, and community facilities. Project site residents, employees, and visitors would have easy access to high-quality public transit, thereby encouraging transit ridership and reducing the number of single-occupancy vehicle trips and associated GHG emissions.

T-4: Integrate Affordable and Below Market Rate Housing – This measure requires below market rate (BMR) housing. BMR housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit. It is also an important strategy to address the limited availability of affordable housing that might force residents to live far away from jobs or school, requiring longer commutes. Incorporating affordability by design, such as the provision of ADUs could also qualify for this reduction. The quantification method for this measure accounts for VMT reductions achieved for multifamily residential projects that are deed restricted or otherwise permanently dedicated as affordable housing.

T-17: Improve Street Connectivity – This measure accounts for the VMT reduction achieved by a project designed with a higher density of vehicle intersections compared to the average intersection density in the U.S. Increased vehicle intersection density is a proxy for street connectivity improvements, facilitating a greater number of shorter trips and thus a reduction in GHG emissions.

T:55: Infill Development – This measure accounts for the VMT reduction achieved by infill housing development programs that allow residents to live closer to downtown areas where there is greater access to jobs and activities. Residents living at infill development projects typically do not need to travel as far to access essential destinations. This leads to lower VMT and associated GHG emissions compared to similar projects located farther from a downtown area. An example implementation of this measure is Sacramento Area Council of Government's Green Means Go program (SACOG 2021a, 2021b).

Trip Reduction Programs

T-5: Implement Commute Trip Reduction Program (Voluntary) – This measure will implement a voluntary commute trip reduction (CTR) program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, riding transit, walking, and biking, thereby reducing VMT and GHG emissions. Voluntary implementation elements are described in this measure.

T-6: Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) – This measure will implement a mandatory CTR program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, riding transit, walking, and biking, thereby reducing VMT and GHG emissions.

T-7: Implement Commute Trip Reduction Marketing – This measure will implement a marketing strategy to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, riding transit, walking, and biking, thereby reducing VMT and GHG emissions.

T-8: Provide Ridesharing Program – This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. This strategy includes measures such as designating a proportion of parking spaces exclusive to ride sharing vehicles, providing adequate loading and unloading areas for passengers of ride-

sharing vehicles and generating a web site or message board for ride coordination. The focus of this strategy is to increase vehicle occupancy by ridesharing between people driving similar trips, which will result in fewer cars, and thus a decrease in VMT.

T-9: Implement Subsidized or Discounted Transit Program – This measure will provide subsidized or discounted, or free transit passes for employees and/or residents. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions.

T-10: Provide End-of-Trip Bicycle or Scooter Facilities – This measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. Charging stations for e-bikes and/or scooters can also qualify for this reduction. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.

T-11: Provide Employer-Sponsored Vanpool – This measure will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. This strategy is appropriate for office, industrial, and mixed-use projects. In some cases this can be a community strategy, with employers within a particular area pooling resources to provide shuttles to transit. The mode shift from long-distance, single-occupancy vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions.

T-12: Price Workplace Parking – This measure will price on-site parking at workplaces. Because free employee parking is a common benefit, charging employees to park on-site increases the cost of choosing to drive to work, so employees consider alternative modes. It may include explicitly charging a parking fee for its employees, implementing above market rate pricing, validating parking only for invited guests, not providing employee parking while offering transportation allowances, and educating employees about available alternatives. This is expected to reduce single-occupancy vehicle commute trips, resulting in decreased VMT, thereby reducing associated GHG emissions.

T-13: Implement Employee Parking Cash-Out – This measure will require project employers to offer employee parking cash-out. Cash-out is when employers provide employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to or greater than the cost of the parking space. This encourages employees to use other modes of travel instead of single-occupancy vehicles. This mode shift results in people driving less and thereby reduces VMT and GHG emissions.

T-23: Community-Based Travel Planning – This measure will target residences in the plan/community with community-based travel planning (CBTP). CBTP 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, thereby reducing VMT and associated GHG emissions.

Parking or Road Pricing/Management

T-14: Provide Electric Vehicle Charging Infrastructure – Install onsite electric vehicle chargers in an amount beyond what is required by the 2019 California Green Building Standards (CALGreen) at buildings with designated parking areas (e.g., commercial, educational, retail, multifamily). This will enable drivers of PHEVs to drive a larger share

of miles in electric mode (eVMT), as opposed to gasoline-powered mode, thereby displacing GHG emissions from gasoline consumption with a lesser amount of indirect emissions from electricity. Most PHEVs owners charge their vehicles at home overnight. When making trips during the day, the vehicle will switch to gasoline mode if/when it reaches its maximum all-electric range.

T-15: Limit Residential Parking Supply – This measure will reduce the total parking supply available at a residential project or site. Limiting the amount of parking available creates scarcity and adds additional time and inconvenience to trips made by private auto, disincentivizing driving as a mode of travel. Reducing the convenience of driving results in a shift to other modes and decreased VMT and thus a reduction in GHG emissions. Evidence of the effects of reduced parking supply is strongest for residential developments.

T-16: Unbundle Residential Parking Costs from Property Cost – This strategy separates parking costs from property costs, removing the burden from those who do not utilize parking spaces and requiring those who wish to do so to purchase parking spaces at an additional cost. On the assumption that parking costs are passed onto the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT and GHG emissions.

T-24: Implement Market Price Public Parking (On-Street) – This measure will price all on-street parking in a given community, with a focus on parking near central business districts, employment centers, and retail centers. Increasing the cost of parking increases the total cost of driving to a location, incentivizing shifts to other modes and thus decreasing total VMT to and from the priced areas. This VMT reduction results in a corresponding reduction in GHG emissions.

Neighborhood Design

T-18: Provide Pedestrian Network Improvements – This strategy focuses on creating a pedestrian network and connecting projects to nearby destinations via pedestrian pathways. Projects in the City of Vallejo range in size, so the emphasis of this strategy for smaller projects would likely be the construction of network improvements that connect the project sites directly to nearby destinations. For larger projects, this strategy could focus on the development of a robust pedestrian network within the project itself or closing gaps that could connect the project to other areas. This strategy could also include improvements that improve safety outcomes for people walking, especially walking to/from transit stops. Alternatively, implementation could occur through an impact fee program or benefit/ assessment district based on local or regional plans. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT and GHG emissions.

T-19-A: Construct or Improve Bike Facility – This measure will construct or improve a single bicycle lane facility (only Class I, II, or IV) that connects to a larger existing bikeway network. Providing bicycle infrastructure improves biking conditions within an area. This encourages a mode shift on the roadway parallel to the bicycle facility from vehicles to bicycles, displacing VMT and thus reducing GHG emissions. When constructing or improving bicycle facilities, the best practice is to consider local or state bike lane width standards. A variation of this measure is provided as T-19-B, Construct or Improve Bike Boulevard.

T-19-B: Construct or Improve Bike Boulevard – This measure will construct or improve a single bicycle boulevard that connects to a larger existing bikeway network. Bicycle boulevards are a designation within Class III

Bikeway that create safe, low-stress connections for people biking and walking on streets. This encourages a mode shift from vehicles to bicycles, displacing VMT and thus reducing GHG emissions. A variation of this measure is provided as T-19-A, Construct or Improve Bike Facility, which is for Class I, II, or IV bicycle infrastructure.

T-20: Expand Bikeway Network – This measure will increase the length of a city or community bikeway network. A bicycle network is an interconnected system of bike lanes, bike paths, bike routes, and cycle tracks. Providing bicycle infrastructure with markings and signage on appropriately sized roads with vehicle traffic traveling at safe speeds helps to improve biking conditions (e.g., safety and convenience). In addition, expanded bikeway networks can increase access to and from transit hubs, thereby expanding the "catchment area" of the transit stop or station and increasing ridership. This encourages a mode shift from vehicles to bicycles, displacing VMT and thus reducing GHG emissions. When expanding a bicycle network, the best practice is to consider bike lane width standards from local agencies, state agencies, or the National Association of City Transportation Officials' Urban Bikeway Design Guide.

T-21-A: Implement Conventional Carshare Program – This measure will increase carshare access in the user's community by deploying conventional carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes. This helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT and associated GHG emissions. A variation of this measure, electric carsharing, is described in Measure T-20-B, Implement Electric Carshare Program.

T-21-B: Implement Electric Carshare Program – This measure will increase carshare access in the user's community by deploying electric carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes. This helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT and associated GHG emissions. This also encourages a mode shift from internal combustion engine vehicles to electric vehicles, displacing the emissions-intensive fossil fuel energy with less emissions-intensive electricity. Electric carshare vehicles require more staffing support compared to conventional carshare programs for shuttling electric vehicles to and from charging points. A variation of this measure, conventional carsharing, is described in Measure T-21-A, Implement Conventional Carshare Program.

T-22-A: Implement Pedal (Non-Electric) Bikeshare Program – This measure will establish a bikeshare program. Bikeshare programs provide users with on-demand access to bikes for short-term rentals. This encourages a mode shift from vehicles to bicycles, displacing VMT and thus reducing GHG emissions. Variations of this measure are described in Measure T-22-B, Implement Electric Bikeshare Program, and Measure T-22-C, Implement Scootershare Program.

T-22-B: Implement Electric Bikeshare Programs – This measure will establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric pedal assist bikes for short-term rentals. This encourages a mode shift from vehicles to electric bicycles, displacing VMT and reducing GHG emissions. Variations of this measure are described in Measure T-22-A, Implement Pedal (Non-Electric) Bikeshare Program, and Measure T-22-C, Implement Scootershare Program.

T-22-C: Implement Scootershare Program – This measure will establish a scootershare program. Scootershare programs provide users with on-demand access to electric scooters for short-term rentals. This encourages a mode shift from vehicles to scooters, displacing VMT and thus reducing

GHG emissions. Variations of this measure are described in Measure T-22-A, Implement Pedal (Non-Electric) Bikeshare Program, and Measure T-22-B, Implement Electric Bikeshare Program.

Transit

T-25: Extend Transit Network Coverage or Hours – This measure will expand the local transit network by either adding or modifying existing transit service or extending the operation hours to enhance the service near the project site. Starting services earlier in the morning and/or extending services to late-night hours can accommodate commute hours of alternative-shift workers. This will encourage the use of transit and therefore reduce VMT and associated GHG emissions.

T-26: Increase Transit Service Frequency – This measure will increase transit frequency on one or more transit lines serving the plan/community. Increased transit frequency reduces waiting and overall travel times, which improves the user experience and increases the attractiveness of transit service. This results in a mode shift from single-occupancy vehicles to transit, which reduces VMT and associated GHG emissions.

T-27: Implement Transit-Supportive Roadway Treatments – This measure will implement transit-supportive treatments on the transit routes serving the plan/community. Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability. This results in a mode shift from single-occupancy vehicles to transit, which reduces VMT and associated GHG emissions.

T-28: Provide Bus Rapid Transit – This measure will convert an existing bus route to a bus rapid transit (BRT) system. BRT includes the following additional components, compared to traditional bus service: exclusive right-of-way (e.g., busways, queue jumping lanes) at congested intersections, increased limited-stop service (e.g., express service), intelligent transportation technology (e.g., transit signal priority, automatic vehicle location systems), advanced technology vehicles (e.g., articulated buses, low-floor buses), enhanced station design, efficient fare-payment smart cards or smartphone apps, branding of the system, and use of vehicle guidance systems. BRT can increase the transit mode share in a community due to improved travel times, service frequencies, and the unique components of the BRT system. This mode shift reduces VMT and the associated GHG emissions.

T-29: Reduce Transit Fares – This measure will reduce transit fares on the transit lines serving the plan/community. A reduction in transit fares creates incentives to shift travel to transit from single-occupancy vehicles and other traveling modes, which reduces VMT and associated GHG emissions. This measure differs from Measure T-9, Implement Subsidized or Discounted Transit Program, which can be offered through employer-based benefits programs in which the employer fully or partially pays the employee's cost of transit.

T-46: Provide Transit Shelters – For this measure, a local government or transit agency provides amenities that make it safer and more comfortable to wait for the bus. The two interventions that have proven to lead to changes in rider perceptions are adding bus shelters and adding real-time arrival information. Research into transit ridership shows that adding these amenities decreases both the real and the perceived wait time for riders, which impacts riders' willingness to ride.

Clean Vehicles and Fuels

T-30: Use Cleaner-Fuel Vehicles – This measure requires use of cleaner-fuel vehicles (electric vehicles, natural gas and propane vehicles, and vehicles powered by biofuels) in

lieu of similar vehicles powered by gasoline or diesel fuel.

The above list should not be considered exhaustive, and projects can propose other TDM measures if appropriate and desired.

VMT Mitigation Measure Effectiveness

An important consideration when combining TDM measures is whether a maximum VMT reduction should be applied based on land use context. The CAPCOA methodology identifies VMT reduction maximums based on community types tied to land use context. The caps are applied at each step of the VMT reduction calculation (i.e., at the strategy scale, the combined strategy scale, and the global scale). However, these caps are not based on research related to the effectiveness of VMT reduction strategies in different land use contexts. The cap differences are largely based on VMT generation differences within different land use contexts and serve as a proxy for potential limits on VMT reduction strategy effectiveness. For suburban jurisdictions such as Vallejo, CAPCOA identifies a global VMT reduction maximum of 15 percent. **Table 3** presents a summary of the maximum allowable reductions recommended for individual VMT mitigation measures based on the available research and the city's local context.

If new or unusual VMT mitigation measures are proposed and/or the study proposes using a reduction near the higher end of the observed range, the City may hire a consultant (at the applicant's expense) to peer review the VMT study and recommendations. The cost of the peer review will be borne by the applicant/developer.

Each of the TDM measures described above can be combined with others to increase the effectiveness of VMT mitigation; however, the interaction between the various TDM measures is complex and sometimes counterintuitive. Generally, with each additional measure implemented, a VMT reduction is achieved, but the incremental benefit of VMT reduction may diminish. To quantify the VMT reduction that results from combining TDM measures, the analyst must consider multiplicative dampening as outlined in the CAPCOA documentation.

Table 3. VMT Mitigation Measure Reduction Caps

Mitigation Measure	Maximum Potential Reduction[1]
Land Use	
T-1: Increase Residential Density	30.0%
T-2: Increase Job Density	30.0%
T-3: Provide Transit-Oriented Development	31.0%
T-4: Integrate Affordable and Below Market Rate Housing	28.6%
T-17: Improve Street Connectivity	30.0%
T-55: Infill Development	30.0%
Trip Reduction Programs	
T-5: Implement Commute Trip Reduction Program (Voluntary)	4.0%
T-6: Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)	26.0%
T-7: Implement Commute Trip Reduction Marketing	4.0%
T-8: Provide Ridesharing Program	8.0%
T-9: Implement Subsidized or Discounted Transit Program	5.5%
T-10: Provide End-of-Trip Bicycle Facilities	4.4%
T-11: Provide Employer-Sponsored Van pool	8.1%
T-12: Price Workplace Parking	20.0%
T-13: Implement Employee Parking Cash-Out	12.0%
T-23: Community-Based Travel Planning	2.3%
Parking and Road Pricing/Management	
T-14: Provide Electric Vehicle Charging Infrastructure	11.9%
T-15: Limit Residential Parking Supply	13.7%
T-16: Unbundle Residential Parking Costs from Property Cost	15.7%
T-24: Implement Market Price Public Parking (On-Street)	30.0%
Neighborhood Design	
T-18: Provide Pedestrian Network Improvements	6.4%
T-19-A: Construct or Improve Bike Facility	0.8%
T-19-B: Construct or Improve Bike Boulevard	0.2%
T-20: Expand Bikeway Network	0.5%
T-21-A: Implement Conventional Carshare Program	0.15%
T-21-B: Implement Electric Carshare Program	0.18%
T-22-A: Implement Pedal (Non-Electric) Bikeshare Program	0.02%
T-22-B: Implement Electric Bikeshare Programs	0.06%

Mitigation Measure	Maximum Potential Reduction[1]
T-22-C: Implement Scootershare Program	0.07%
Transit	
T-25: Extend Transit Network Coverage or Hours	4.6%
T-26: Increase Transit Service Frequency	11.3%
T-27: Implement Transit-Supportive Roadway Treatments	0.6%
T-28: Provide Bus Rapid Transit	13.8%
T-29: Reduce Transit Fares	1.2%
T-46: Provide Transit Shelters	0.32%

[1] These figures are the maximum potential reduction identified in the CAPCOA research. In general, lower reductions should be anticipated for land-use developments within Vallejo. For TDM reductions for projects within the city, supporting evidence and calculations should be provided.
Source: California Air Pollution Control Officers Association, *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Final Draft*, October 2024.

Other Environmental Considerations

As noted in the Introduction, the updated CEQA Guidelines Appendix G Checklist contains three additional criteria beyond the VMT evaluation criteria discussed in the preceding section. They are listed below.

Would the project:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

4. Result in inadequate emergency access?

The CEQA Transportation section should address these three questions, considering the unique characteristics of the project, including its location, size, design, use mix, transportation and urban form context, and other relevant details. In the assessment of transit, bicycle, and pedestrian networks, the following standards of significance shall be used.

Transit System – The project would create a significant impact related to transit service if the following criteria is met:

1. The project interferes with existing transit facilities or precludes the construction of planned transit facilities.

Bicycle System – The project would create a significant impact related to the bicycle system if any of the following criteria are met:

1. The project disrupts existing bicycle facilities; or
2. Interferes with planned bicycle facilities; or
3. Creates inconsistencies with adopted bicycle system plans, guidelines, policies, or standards.

Pedestrian System – The project would create a significant impact related to the pedestrian system if any of the following criteria are met:

1. The project disrupts existing pedestrian facilities; or

2. Interferes with planned pedestrian facilities; or
3. Creates inconsistencies with adopted pedestrian system plans, guidelines, policies, or standards.

City of Vallejo
CEQA Transportation Impact Analysis Guidelines

Prepared for:
City of Vallejo

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WC19-3631

FEHR PEERS

Table of Contents

Attachments

Introduction

SB 743 and the Updated CEQA Guidelines

SB 743, signed by the Governor in 2013, is changing the way transportation impacts are identified. Specifically, the legislation directed the Office of Planning and Research (OPR) to consider different metrics for identifying transportation impacts under the California Environmental Quality Act (CEQA). The OPR finalized updates to the CEQA Guidelines in December 2018; the updated Guidelines identify vehicle miles of travel (VMT) as the preferred transportation impact metric. The updated Guidelines state that, by July 2020, all lead agencies must use VMT as the new transportation metric for identifying impacts of land use projects.

The updated Guidelines include revised Appendix G Checklist questions for transportation impact evaluation. The four questions are:

Would the project:

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

Criteria 2 is the implementation of the SB 743 requirement. CEQA Guidelines section 15064.3(b) reads, in part, as follows:

(1) Land Use Projects. Vehicle-miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

City of Vallejo SB 743 Implementation Process

In anticipation of the change to the VMT metric, the City of Vallejo initiated and is nearing completion of a SB 743 Implementation Study. The study included the following steps.

- Review of relevant policies related to greenhouse gas reduction, multimodal transportation, and VMT (memorandum dated October 28, 2019).
- Review of potential travel demand models for use in VMT analysis (memorandum dated October 28, 2019).
- Presentation to City Planning Commission on SB 743 background and implementtion guidance from OPR and other sources (presentation on January 6, 2020).
- Preparation of methodology and threshold options based on guidance in the Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) and other research regarding VMT reductions needed to achieve the state's greenhouse gas reduction goals (memorandum dated January 31, 2020).
- Preparation of City staff methodology and threshold recommendations for Planning Commission consideration (memorandum dated April 6, 2020).
- Presentation of City staff-recommended methodology and thresholds (presentation on April 20, 2020).

The Planning Commission expressed support for the City staff-recommended methodology and thresholds, and the recommendation will be considered at the June 23, 2020 City Council Meeting.

As noted in CEQA Guidelines Section 15064.7(b) below, lead agencies are encouraged to formally adopt their significance thresholds and this is key part of the SB 743 implementation process.

> *(b) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).*

CEQA Transportation Impact Analysis and City Development Review

One of the fundamental roles of government agencies is the construction and maintenance of public infrastructure facilities including roadways, rail and bus facilities, bicycle and pedestrian infrastructure, water lines, sanitary sewer lines, stormwater treatment facilities, parks, and other public facilities. When private development occurs, it is the responsibility of government to ensure that there are adequate public facilities to serve incremental population and employment growth. For the transportation system, one way to address this issue has been the preparation of a Transportation Impact Analysis (TIA).

For the past several decades, the preparation of a TIA was integrated into the CEQA process, in which the TIA was used primarily to analyze a project's impacts under CEQA. However, with the passage of SB 743, changes to this process are necessary. Specifically, a *Transportation Assessment (TA)* may need to be prepared as a stand-alone document, as part of the project approval process, including information for the decision makers that is not required as part of the CEQA process. A separate *Transportation Impact Analysis (TIA)* would contain the information specifically needed for the CEQA document.

The purpose of this *TIA Guidelines* document is to provide instructions for analyzing the potential transportation impacts of proposed development projects, for purposes of the CEQA evaluation. These guidelines present the recommended methodology that should generally be utilized in the preparation of TIAs. These recommendations are general guidelines and the City of Vallejo may modify the TIA requirements based on the unique characteristics of a particular project.

Can LOS Analysis Still be Conducted as Part of Development Review?

SB 743 does not prevent a city or county from continuing to analyze delay or LOS outside of CEQA review for other transportation planning or analysis purposes (i.e., general plans, impact fee programs, corridor studies, congestion mitigation, or ongoing network monitoring); but these metrics may no longer constitute the sole basis for CEQA impacts.

The City's General Plan 2040 has an advisory standard of LOS E or better, to be considered along with, but not to override, metrics for pedestrian, bicycle, transit and emergency access performance (General Plan Policy MTC-2.5). LOS can continue to be assessed relative to this standard during development review, to promote the City's interest in maintaining and operating a functional roadway network. However,

assessment of a development project's effect on intersection level of service must be conducted outside the CEQA process. The assessment can be performed as part of a General Plan consistency assessment, within a separate Transportation Assessment document. City planning and traffic engineering staff will define the scope and methodology for project-level of service analysis as part of the development review process.

Congestion Management Program Compliance Changes

A key element of SB 743 is the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. This change is intended to assist in balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

SB 743 contains amendments to current congestion management law that allows cities and counties to effectively opt-out of the LOS standards that would otherwise apply in areas where Congestion Management Programs (CMPs) are still used (see Government Code Sections 65088.1 and 65088.4). Solano County's Congestion Management Program was recently updated in October 2019. The CMP network in Vallejo includes I-80, SR 37, SR 29 (Sonoma Boulevard), Curtola Parkway, Mare Island Way, and Tennessee Street west of I-80. Three intersections are monitored in the CMP: Tennessee Street/Sonoma Boulevard, Tennessee Street/Mare Island Way, and Curtola Parkway/Sonoma Boulevard. The LOS standard for these intersections in LOS E. The 2019 monitoring indicated all three intersections operated at LOS D or better. However, as noted here, the City of Vallejo may choose to opt out of compliance with the LOS E standard.

VMT Analysis

A key element of SB 743, signed in 2013, is the elimination of automobile delay and LOS as the sole basis of determining CEQA impacts. The most recent CEQA guidelines, released in December 2018, recommend VMT as the most appropriate measure of project transportation impacts. However, SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., the general plan), studies, or ongoing network monitoring.

The following methodology should be used to determine VMT impact thresholds and mitigation requirements for land use project TIAs. These recommendations were developed by City of Vallejo staff with guidance from Fehr & Peers, and are based on the updated *CEQA Guidelines* (December 2018) and the Office of Planning and Research guidance document *Technical Advisory on Analyzing Transportation Impacts in CEQA* (December 2018) (*Technical Advisory*).

Analysis Methodology

For purposes of SB 743 compliance, a VMT analysis should be conducted for land use projects as deemed necessary by the City Planning Manager and Traffic Engineer, and would apply to projects that have the potential to increase the average VMT per service population, resident, or employee, depending on the project type. (Service population is residents plus employees.) Normalizing VMT per service population, resident, or employee essentially provides a transportation efficiency metric. Using this efficiency metric allows the analyst to compare the project to the city as a whole, for purposes of identifying transportation impacts.

In addition to assessing the project's VMT efficiency, the project's effect on total countywide VMT is also calculated, to assess how the project may change VMT within the county as it interacts with other county land uses.

Attachment A provides a flowchart outlining the process described below.

Consistency with the Regional Transportation Plan/Sustainable Communities Strategy

The first step in assessing project impacts is to determine if the project land use is contained within the City of Vallejo residential and non-residential land use allocations in the current Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and if the project is consistent with the City of Vallejo General Plan. As of June 2020, the current RTP/SCS is *Plan Bay Area 2040*, adopted in 2017. If the project is not consistent with the RTP/SCS and/or the General Plan, amendments to those documents would be needed prior to proceeding with the project review.

Project Screening

There are three types of screening that lead agencies can apply to effectively screen projects from project-level assessment. These screening steps are summarized below:

Step 1: Transit Priority Area (TPA) Screening

Projects located within a TPA[1] may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may ***NOT*** be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the City (if the City requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City, with input from the Metropolitan Transportation Commission); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Step 2: Low VMT Area Screening

Citywide VMT Averages

Table 1 shows the citywide average VMT metrics as reported by the Solano-Napa Activity Based Travel Demand Model (SNABM).

Table 1: City of Vallejo VMT Metrics

Land Use	City of Vallejo Baseline Year (2015)	City of Vallejo Cumulative Year (2040)[1]
Residential	26.0 VMT/resident	In Progress
Office/Employment	31.5 VMT/employee	In Progress

1. Adjustments which were made to the 2015 model to improve performance are currently being transferred to the 2040 model; the adjusted 2040 model results will be available by mid-August, 2020.
Source: Solano-Napa Activity Based Travel Demand Model; Fehr & Peers, July 2020.

For information, the City of Vallejo metrics are compared to countywide and nine-county Bay Area metrics in **Table 2.** As the table indicates, Vallejo's residential home-based VMT per resident is lower than the Solano County average but higher than the Bay Area average. Vallejo's employment home-work VMT per employee is higher than both the Solano County and Bay Area averages.

[1] A TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high quality transit corridor per the definitions below.

Pub. Resources Code, § 21064.3 - 'Major transit stop' means 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 service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Table 2: City of Vallejo VMT Metrics Compared to County and Region

Land Use	Baseline (2015) City of Vallejo	Baseline (2015) Solano County	Baseline (2015) Bay Area	Cumulative (2040) City of Vallejo[1]	Cumulative (2040) Solano County[1]	Cumulative (2040) Bay Area[1]
Residential	26.0 VMT/resident	28.8 VMT/resident	23.4 VMT/resident	In Progress	In Progress	In Progress
Office/Employment	31.5 VMT/employee	30.9 VMT/employee	24.0 VMT/employee	In Progress	In Progress	In Progress

1. Adjustments which were made to the 2015 model to improve performance are currently being transferred to the 2040 model; the adjusted 2040 model results will be available by mid-August, 2020.
Source: Solano-Napa Activity Based Travel Demand Model; Fehr & Peers, July 2020.

Project VMT Screening Based on Low-VMT Area

Residential and office projects located within a low-VMT generating area of the city (i.e., lower than citywide average levels, based on the significance thresholds in this document) may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low-VMT area.

The SNABM was reviewed and found to not provide reasonable traffic analysis zone (TAZ)-level results for purposes of identifying low-VMT areas of the city. Therefore, a project applicant and their analyst may present other data, if feasible, to identify if the project is in a low-VMT generating area. One potential data source would be trip generation and trip length information from a location-based services data vendor, demonstrating that similar uses near the project site generate VMT per service population, per resident, or per employee that is no higher than the citywide average. The analyst should use professional judgement to ensure that there is nothing unique about the project that would otherwise be mis-represented utilizing the vendor data.

Other methods for identifying low-VMT areas of the city may become available in the months and years ahead. Therefore, the City may consider other screening methods, supported by substantial evidence for their use.

For low VMT area screening to be satisfied, the analyst must verify that the project land uses would not alter the existing built environment in such a way as to increase the rate or length of vehicle trips (e.g. the proposed project is consistent with existing land use in the area, the project would be expected to contribute VMT consistent with existing land use in the area, and the project would not significantly alter travel patterns in the area).

Step 3: Project Type Screening

The *Technical Advisory* states that local-serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local-serving retail generally improves the convenience of shopping and other activities close to home and has the effect of reducing vehicle travel.

The following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary, as their uses are local serving in nature; however, note that it is recommended that as much substantial evidence as possible be provided for the local-serving nature of a given project:

- Local-serving K-12 public schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
    - Gas stations
    - Banks
    - Restaurants
    - Shopping centers
- Local-serving hotels (e.g. non-destination hotels)
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (public libraries, fire stations, local government facilities)
- Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Affordable or supportive housing[2]
- Assisted living facilities
- Senior housing (as defined by HUD)
- Projects generating less than 110 daily vehicle trips[3]
    - This generally corresponds to the following "typical" development potentials:

[2] The project must provide 100% of residential units as affordable or supportive housing.

[3] This threshold ties directly to the OPR technical advisory and 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).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

- 11 single family housing units
- 16 multi-family, condominiums, or townhouse housing units
- 10,000 sq. ft. of office
- 15,000 sq. ft. of light industrial[4]
- 63,000 sq. ft. of warehousing
- 79,000 sq. ft. of high cube transload and short-term storage warehouse[7]

Any project that uses the designation of "local-serving" should be able to demonstrate that its users (employees, customers, visitors) would come primarily from within the city limits. The project would therefore not generate new "demand" for the project land uses, but would meet at existing demand that would shorten the distance existing residents, employees, customers, or visitors would need to travel.

VMT Assessment for Non-Screened Development

Projects not screened through the steps above should complete a VMT analysis using the SNABM to determine if they have a significant VMT impact. This analysis should include 'project generated VMT' and 'project effect on VMT' estimates for the project as follows. Thresholds of significance are discussed in the next section. **Attachment B** provides more detailed direction on the steps below.

- Baseline Conditions – Conditions in the baseline year for the CEQA analysis, which is most often chosen as the time of notice of preparation (NOP) of an environmental document, but may be chosen as the baseline year of the SNABM, if land use and transportation network conditions can be considered largely unchanged between the model baseline year and the date of the NOP. VMT for the project TAZ and citywide total should be calculated.
- Baseline Plus Project - The project land use is added to the project TAZ or a separate TAZ may be created to contain the project land uses. A full model run is performed and VMT changes (by metric of choice) is isolated for the project TAZ and across the full model network. The model output must include reasonableness checks of the production and attraction balancing to ensure the project effect is accurately captured. If this scenario results in a less-than-significant impact, then additional cumulative scenario analysis may not be required (more information about this outcome can be found in the Thresholds Evaluation discussion later in this section).
- Cumulative No Project– Conditions in the future year travel demand model (current future year is 2040).
- Cumulative Plus Project - The project land use is added to the project TAZ or a separate TAZ is created to contain the project land uses. The addition of project land uses may be accompanied by a reallocation of a similar amount of land use from other TAZs throughout the model area (focusing on Solano and Napa Counties), especially if the proposed project is significant in size such that it would potentially reduce the potential for development throughout the rest of the model area. Land use projects will generally not change the cumulative no project control totals

[4] Threshold may be higher depending on the tenant and the use of the site. This number was estimated using rates from ITE's *Trip Generation Manual*.

for population and employment growth within the model area. Instead, they will influence the land use supply through changes in general plan land use designations and zoning. If project land uses are simply added to the cumulative no project scenario, then the analysis should reflect this limitation in the methodology and acknowledge that the analysis may overestimate the project's effect on VMT. A full model run is performed and VMT changes (by metric of choice) would be isolated for the project TAZ and across the full model network. The model output must include reasonableness checks of the production and attraction balancing to ensure the project effect is accurately captured.

The model output should include total network-based boundary VMT by speed bin, which includes all vehicle trips and trip purposes in a defined boundary[5] to measure the project effect on VMT. The model output should include the following project-generated VMT: Total Project VMT (all trip purposes) per service population (population plus employment); Residential Tour VMT per resident (for residential projects) and Home-Based-Work Tour VMT per employee (for office/employment uses). The network-based boundary VMT is needed as an input for air quality, greenhouse gas (GHG), and energy impact analysis, while the project-generated VMT metrics are used for the transportation impact analysis.

Both "plus project" scenarios noted above will summarize two types of VMT: (1) the project effect on VMT, comparing how the project changes VMT on the boundary network looking at citywide VMT in absolute terms and also per service population, comparing these to the No Project condition, and (2) project-generated VMT per service population, per resident, or per employee, with a comparison to the appropriate benchmark noted in the thresholds of significance.

Project-generated VMT should be extracted from the travel demand forecasting model by combining either the origin-destination (for total VMT) or production-attraction (for the other metrics) trip matrices and congested skims from final assignment. The VMT should be adjusted to reflect trips that extend beyond the model boundary (this is described in more detail in Attachment B). The project's effect on VMT should be estimated using the regional boundary (recommended region is Solano County) and extracting the total link-level VMT for both the No Project and With Project condition.

If a project is mixed-use (i.e. composed of both residential and retail/office uses) project-generated VMT should be extracted for both the total VMT and VMT per service population (residents and employees).

Significance Thresholds

The City has adopted the following thresholds of significance. These thresholds are intended to hold new development VMT generation at or below citywide VMT generation levels, for the baseline and cumulative scenarios. This is expected to result in declining VMT over time, as compared to a business as usual condition with no VMT limits. The thresholds balance the City's priorities with respect to competing

[5] Network-based VMT is also referred to as boundary method VMT. For most projects, boundary method for the City should be adequate. For projects located near the City limit, an alternative boundary should be considered that captures the true effect the project has on local traffic. This could be determined using average trip length to/from the site or other approach to completely capture changes in VMT.

objectives including Vallejo's geographic and transportation context, greenhouse gas reduction goals, interest in achieving the state's greenhouse gas reduction goals, and General Plan 2040 goals and policies related to land use mix, economic development, and housing provision.

Threshold 1: Project Generated VMT (Residential and Office/Industrial Projects) - Baseline

Project-generated Residential Tour VMT per resident (for residential projects), Home-Based-Work Tour VMT per employee (for office/industrial projects) or Total VMT per service population (for mixed-use projects) is no higher than the baseline citywide Residential Tour VMT per resident, Home-Based-Work Tour VMT per employee, or Total VMT per service population.

Threshold 2: Project Generated VMT (Residential and Office/Industrial Projects) - Cumulative

Project-generated Residential Tour VMT per resident (for residential projects), Home-Based-Work Tour VMT per employee (for office/industrial projects), or Total VMT per service population (for mixed-use projects) is no higher than the cumulative citywide Residential Tour VMT per resident, Home-Based-Work Tour VMT per employee, or Total VMT per service population. This threshold does not apply if it can be demonstrated that VMT rates are declining at the time of the analysis.

Threshold 3: Project's Effect on VMT (Residential and Office/Industrial Projects) -- Cumulative

The Project reduces or has no effect on the citywide total VMT under cumulative conditions.

Threshold 4: Project-Generated VMT and Project's Effect on VMT (Other Project Types)

VMT thresholds for other project types (for example, institutional, destination hotel, or cultural projects) would be developed using considerations unique to the individual project. The thresholds will incorporate the principles of Thresholds 1 – 3, i.e., projects that are not expected to generate VMT above a relevant baseline level and/or are not expected to increase VMT in the cumulative condition would be considered to have a less than significant impact with respect to VMT.

VMT Mitigation Measures

To mitigate VMT impacts, the following choices are available to the applicant:

1. Modify the project's built environment characteristics to reduce VMT generated by the project
2. Implement transportation Demand Management (TDM) measures to reduce VMT generated by the project.
3. Participate in a VMT fee program and/or VMT mitigation exchange/banking program (if they exist) to reduce VMT from the project or other land uses to achieve acceptable levels

As part of the Vallejo SB 743 Implementation Study, key VMT reduction measures that are appropriate to the Vallejo land use, urban form and transportation context were identified. These measures are

summarized below, with additional effectiveness estimates and background information provided in **Attachment C.**

Potential VMT Reduction Measures

- Increase transit accessibility: provide transit stops, fund or contribute to shuttle service, provide transit subsidies to project residents or employees, or other actions that increase the ability of residents or employees to use transit
- Provide pedestrian network improvements: eliminate sidewalk gaps which create barriers to off-site activity centers, or enhance the width or design of existing off-site sidewalks or paths
- Provide bicycle network improvements: eliminate bike facility gaps, add new bike lanes, protected bike lanes, or off-street multi-use paths connecting to key off-site activity centers
- Provide traffic calming measures: construct off-site traffic calming measures which slow auto traffic and create a more comfortable walking and bicycling environment
- Implement a car-sharing program: provide car sharing within a project, or contribute funding to an off-site car sharing site, reducing the need for site employees to commute by car or the need for site residents to own a car
- "Un-bundle" private parking: lease parking separately from office space or residential units within a project site, thus encouraging site users to consider the independent value of the parking and potentially reducing car use
- Implement market-rate public parking: price all public parking within a particular area (downtown, for example) to encourage "park once" behavior, reducing automobile circulation
- Increase transit service frequency: contribute funding to allow transit agencies to provide shorter headways and improve transit trip speed and reliability
- Encourage telecommuting and alternative work schedules: provide telecommuting incentives to reduce employee commuting by automobile

Evaluation of VMT reductions should be conducted using state-of-the-practice methodologies recognizing that many of the TDM strategies are dependent on building occupant performance over time. As such, actual VMT reduction cannot be reliably predicted and monitoring may be necessary to gauge performance related to mitigation expectations.

Potential Future Changes to City VMT Evaluation Methodology

An alternative approach to assessing VMT impacts is to conduct a CEQA analysis of the VMT associated with the City's General Plan, and use that evaluation to support analysis of individual projects subsequent to the General Plan-level evaluation. This approach acknowledges that the City of Vallejo General Plan land use allocations and associated VMT have already been planned for and determined to be acceptable by the City. It also allows the City to set a citywide VMT reduction target and threshold of significance, and plan VMT reduction strategies and programs in a more holistic, effective, and equitable manner than would be possible using project-by-project impact evaluations. It would also provide opportunities for streamlined review of projects under CEQA Guidelines section 15183.

The City of Vallejo intends to prepare an updated General Plan and EIR as described above. When that process is complete, this guideline document will be revised to reflect the new citywide VMT thresholds of significance, VMT reduction targets, VMT reduction policies and TDM measures, and analysis methodology for individual project level reviews

Analysis for Other Appendix G Checklist Criteria

As noted in the Introduction, the updated CEQA Guidelines Appendix G Checklist contains three additional criteria beyond the VMT evaluation criteria discussed in the preceding section. They are listed below.

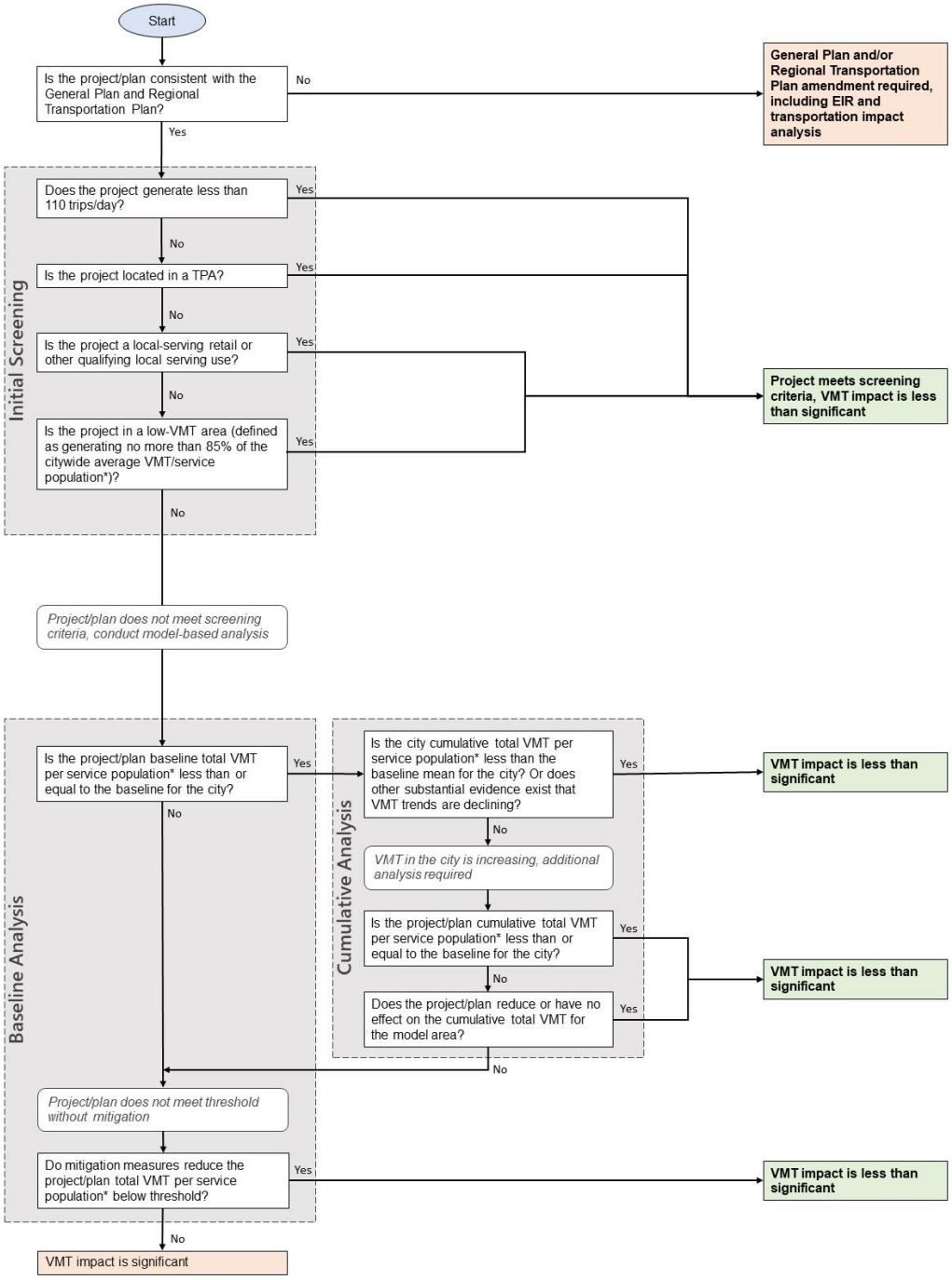
Would the project:

1. *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
3. *Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*
4. *Result in inadequate emergency access?*

TIAs should address these three questions, considering the unique characteristics of the project, including its location, size, design, use mix, transportation and urban form context, and other relevant details.

Attachments

A. VMT Analysis Process Flowchart

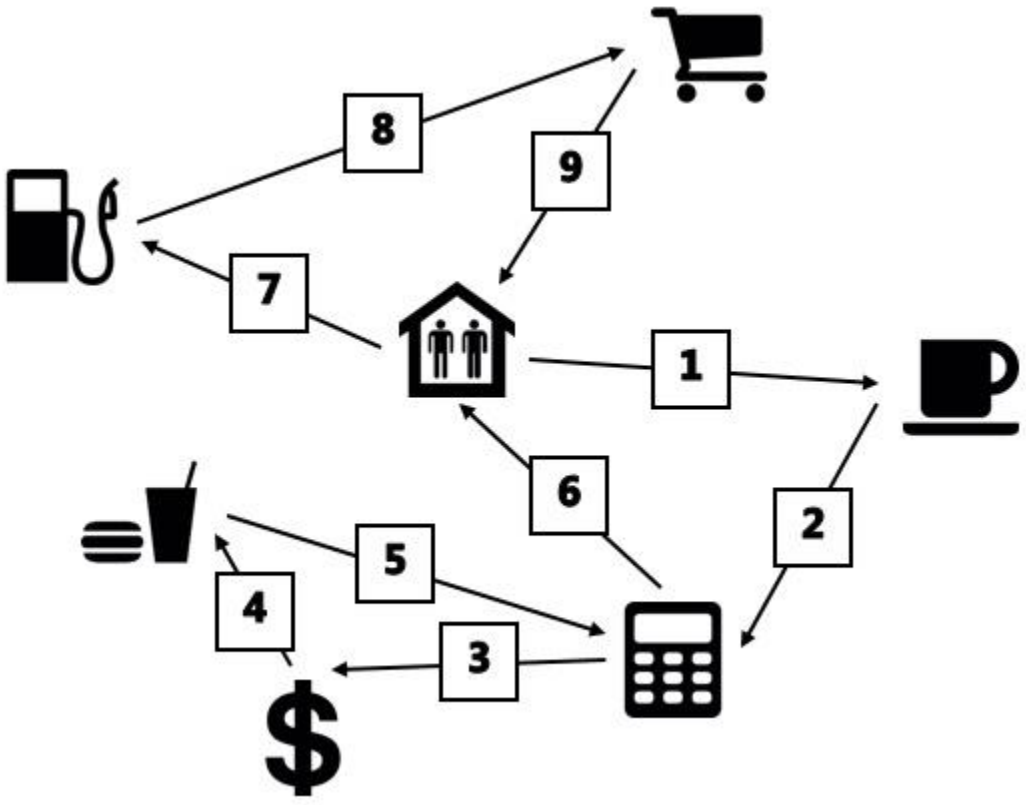


* "Service population" = employees + residents. For single-use residential projects, the service population is residents; for single-use employment projects (such as office uses), the service population is employees.

B. Detailed VMT Forecasting Information

Travel demand models generate daily person trip-ends for each TAZ across various trip purposes (Home-Based-Work, Home-Based-Other, and Non-Home-Based, for example) based on population, household, and employment variables. Travel demand models are simplifications of reality and as such, TAZs often contain a large amount of population, households, and employment. Travel models do not tie trip generation to individual land uses but instead aggregate all up to the TAZ level. This can create challenges for complying with the SB743 guidance because the thresholds are tied to specific land use categories and their behavior. The following methodology addresses this particular challenge among others.

To better understand the trips used in each metric, consider the following daily vehicle trip tour for an individual residential worker in TAZ. Note that each TAZ would have many individual residential workers and thus the calculations would be a sum of these individual calculations:



These nine daily vehicle trips include a variety of trip purposes: home-based work (HBW), home-based other (HBO), work-based other (WBO), and other-based other (OBO). WBO and OBO trips are often grouped into a non-home based (NHB) category. The table below categorizes the nine daily trips into trip purposes.

Trip	Tour	Origin	Destination	Purpose	Distance
1	Work	Residence	Coffee Shop	HBO	2 miles
2	Work	Coffee Shop	Work	WBO (NHB)	10 miles
3	Work	Work	ATM	WBO (NHB)	1 mile
4	Work	ATM	Sandwich Shop	OBO (NHB)	1 mile
5	Work	Sandwich Shop	Work	WBO (NHB)	1 mile
6	Work	Work	Residence	HBW	11 miles
7	Home	Residence	Grocery Store	HBO	3 miles
8	Home	Grocery Store	Gas Station	OBO (NHB)	1 mile
9	Home	Gas Station	Residence	HBO	2 miles

The SNABM is an activity-based model that uses links an individual's trips into "tours." Therefore it is straightforward to calculated VMT associated with residential or work locations based on the type of "tour." The table below describes the calculation for the partial VMT metrics.

Description	Trips	VMT	Comments
Residential Tour	1-9	32 miles	Includes all trips by a resident
Home-Based-Work Tour	6	11 miles	Includes all home-based-work trips

The Total VMT calculation (all trip purposes for both resident and worker) is more easily calculated using the final origin-destination vehicle matrices and summing all origin and destination trip ends for each TAZ. The Total VMT calculation is includes all trips, all trip purposes, for any interaction with the TAZ regardless of whether they are a resident or worker of the TAZ.

Each of these metrics need to be adjusted to account for the length of trips that get truncated at the travel model boundary. Adjusting the length of trips leaving a model boundary requires appending extra distance at the model gateway zone (or external centroid) connector based on calculations from a parent travel demand model, such as the California Statewide Travel Demand Model (CSTDM). This process results in new gateway distances that are weighted based on the amount and location of external travel origins and destinations. The calculations would need to address the distance of trips outside of travel model boundary; in the case of the SNABM this is the nine county Bay Area.

C. Mitigation Measures

A list of mitigation measures which are considered appropriate for Vallejo's geographic and transportation context is provided in the following pages. Potential effectiveness in reducing VMT, along with the basis for the effectiveness finding, is also given. More information on the effectiveness estimates is provided in the Technical Memorandum *VMT Analysis Methodology and Significance Thresholds for City of Vallejo Transportation Impact Assessment: Summary and Next Steps* (April 6, 2020).

For each project mitigation evaluation, the analyst should consider the potential effectiveness for the specific project being evaluated, including its location within Vallejo, multi-modal transportation network and services available to the project, project transportation amenities and proposed improvements to the surrounding network, and other relevant characteristics.

Attachment 3

Mitigation Measures:

FEHR PEERS

VMT Reduction Strategies Based on Vallejo's Land Use and Transportation Context

					New Information Since CAPCOA Was Published in 2010		
CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New information	Change in VMT reduction compared to CAPCOA(1)	Literature or Evidence Cited
Land Use/Location	3.1.1	LUT-1 Increase Density	0.8% - 30% VMT reduction due to increase in density	Adequate	Increasing residential density is associated with lower VMT per capita. Increased residential density in areas with high jobs access may have a greater VMT change than increases in regions with lower jobs access. The range of reductions is based on a range of elasticities from -0.04 to -0.22. The low end of the reductions represents a -0.04 elasticity of demand in response to a 10% increase in residential units or employment density and a -0.22 elasticity in response to 50% increase to residential/employment density.	0.4% -10.75%	Primary sources: Boarnet, M. and Handy, S. (2014). Impacts of Residential Density on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Secondary source: Stevens, M. (2017). Does Compact Development Make People Drive Less? Journal of the American Planning Association, 83(1), 7-18.
Land Use/ Location	3.1.3	LUT-3 Increase Diversity of Urban and Suburban Developments	9%-30% VMT reduction due to mixing land uses within a single development	Adequate	1] VMT reduction due to mix of land uses within a single development; 2] Reduction in VMT due to regional change in entropy index of diversity.	1] 0%-12% 2] 0.3%-4%	1] Ewing, R. and Cervero, R. (2010). Travel and the Built Environment - A Meta-Analysis. Journal of the American Planning Association,76(3),265-294. Cited in California Air Pollution Control Officers Association. (2010).Quantifying Greenhouse Gas Mitigation Measures. Retrieved from: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf Frank, L., Greenwald, M., Kavage, S. and Devlin, A. (2011). An Assessment of Urban Form and Pedestrian and Transit Improvements as an Integrated GHG Reduction Strategy. WSDOT Research Report WA-RD 765.1. Washington State Department of Transportation. Retrieved from: http://www.wsdot.wa.gov/research/reports/fullreports/765.1.pdf Nasri, A. and Zhang, L. (2012). Impact of Metropolitan-Level Built Environment on Travel Behavior. Transportation Research Record: Journal of the Transportation Research Board, 2323(1), 75-79. Sadek, A. et al. (2011). Reducing VMT through Smart Land-Use Design. New York State Energy Research and Development Authority. Retrieved from: https://www.dot.ny.gov/divisions/engineering/technical-services/trans-r-and-d-repository/C-08-29%20Final%20Report_December%202011%20%282%29.pdf Spears, S.et al. (2014). Impacts of Land-Use Mix on Passenger Vehicle Use and Greenhouse Gas Emissions- Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm 2] Zhang, Wengia et al. "Short- and Long-Term Effects of Land Use on Reducing Personal Vehicle Miles of Travel."

Relevant Strategies for Implementation in Vallejo Due to Land Use Context

CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New Information Since CAPCOA Was Published in 2010		
					New information	Change in VMT reduction compared to CAPCOA(1)	Literature or Evidence Cited
Land Use/ Location	3.1.5	LUT-5 Increase Transit Accessibility	0.5%-24.6% reduce in VMT due to locating a project near high-quality transit	Adequate	1] VMT reduction when transit station is provided within 1/2 mile of development (compared to VMT for sites located outside 1/2 mile radius of transit). Locating high density development within 1/2 mile of transit will facilitate the use of transit by people traveling to or from the Project site. The use of transit results in a mode shift and therefore reduced VMT. 2] Reduction in vehicle trips due to implementing TOD. A project with a residential/commercial center designed around a rail or bus station, is called a transit-oriented development (TOD). The project description should include, at a minimum, the following design features: • A transit station/stop with high-quality, high-frequency bus service located within a 5-10 minute walk (or roughly ¼ mile from stop to edge of development), and/or • A rail station located within a 20 minute walk (or roughly ½ mile from station to edge of development) • Fast, frequent, and reliable transit service connecting to a high percentage of regional destinations • Neighborhood designed for walking and cycling	1] 0%-5.8% 2] 0%-7.3%	1] Lund, H. et al. (2004). Travel Characteristics of Transit-Oriented Development in California. Oakland, CA: Bay Area Rapid Transit District, Metropolitan Transportation Commission, and Caltrans. Tal, G. et al. (2013). Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature. California Air Resources Board. Retrieved from: https://www.arb.ca.gov/cc/sb375/policies/transitaccess/transit_access_brief120313.pdf 2] Zamir, K. R. et al. (2014). Effects of Transit-Oriented Development on Trip Generation, Distribution, and Mode Share in Washington, D.C., and Baltimore, Maryland. Transportation Research Record: Journal of the Transportation Research Board. 2413, 45–53. DOI: 10.3141/2413-05
Neighborhood Site Enhancements	3.2.1	SDT-1 Provide Pedestrian Network Improvements	0%-2% reduction in VMT for creating a connected pedestrian network within the development and connecting to nearby destinations	Adequate	VMT reduction due to provision of complete pedestrian networks.	0.5%-5.7%	Handy, S. et al. (2014). Impacts of Pedestrian Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Neighborhood Site Enhancements	3.2.2	SDT-2 Provide Traffic Calming Measures	0.25%-1% VMT reduction due to traffic calming on streets within and around the development	Adequate	Reduction in VMT due to building out a low-stress bike network; reduction in VMT due to expansion of bike networks in urban areas.	0%-1.7%	1] California Air Resources Board. (2016). Greenhouse Gas Quantification Methodology for the California Transportation Commission Active Transportation Program Greenhouse Gas Reduction Fund Fiscal Year 2016-17. Retrieved from: https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/ctc_atp_finalqm_16-17.pdf. 2] Zahabi, S. et al. (2016). Exploring the link between the neighborhood typologies, bicycle infrastructure and commuting cycling over time and the potential impact on commuter GHG emissions. Transportation Research Part D: Transport and Environment. 47, 89-103.
Neighborhood Site Enhancements	3.4.9	TRT-9 Implement Car-Sharing Program	0.4% - 0.7% VMT reduction due to lower vehicle ownership rates and general shift to non-driving modes	Adequate	Vehicle trip reduction due to car-sharing programs; reduction assumes 1%-5% penetration rate. Car sharing effect on VMT is still evolving due to TNC effects. UCD research showed less effect on car ownership due to car sharing participation and an uncertain effect on VMT.	0.3%-1.6%	Lovejoy, K. et al. (2013). Impacts of Carsharing on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm Clewlow, Regina R. and Mishra, Gouri Shankar, (2017). Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States. UC Davis, Institute of Transportation Studies. Research Report - UCD-ITS-RR-17-07.

Relevant Strategies for Implementation in Vallejo Due to Land Use Context

CAPCOA Category	CAPCOA #	CAPCOA Strategy	CAPCOA Reduction	Strength of Substantial Evidence for CEQA Impact Analysis?	New Information Since CAPCOA Was Published in 2010		
					New information	Change in VMT reduction compared to CAPCOA(1)	Literature or Evidence Cited
Parking Pricing	3.3.3	PDT-3 Implement Market Price Public Parking	2.8%-5.5% VMT reduction due to "park once" behavior and disincentive to driving	Adequate	Implement a pricing strategy for parking by pricing all central business district/employment center/retail center on-street parking. It will be priced to encourage park once" behavior. The benefit of this measure above that of paid parking at the project only is that it deters parking spillover from project supplied parking to other public parking nearby, which undermine the vehicle miles traveled (VMT) benefits of project pricing. It may also generate sufficient area-wide mode shifts to justify increased transit service to the area. VMT reduction applies to VMT from visitor/customer trips only. Reductions higher than top end of range from CAPCOA report apply only in conditions with highly constrained on-street parking supply and lack of comparably-priced off-street	2.8%-14.5%	Clinch, J.P. and Kelly, J.A. (2003). Temporal Variance Of Revealed Preference On-Street Parking Price Elasticity. Dublin: Department of Environmental Studies, University College Dublin. Retrieved from: http://www.ucd.ie/gpep/research/workingpapers/2004/04-02.pdf. Cited in Victoria Transport Policy Institute (2017). Transportation Elasticities: How Prices and Other Factors Affect Travel Behavior. Retrieved from: http://www.vtpi.org/tdm/tdm11.htm Hensher, D. and King, J. (2001). Parking Demand and Responsiveness to Supply, Price and Location in Sydney Central Business District. Transportation Research A. 35(3), 177-196. Millard-Ball, A. et al. (2013). Is the curb 80% full or 20% empty? Assessing the impacts of San Francisco's parking pricing experiment. Transportation Research Part A. 63(2014), 76-92. Shoup, D. (2011). The High Cost of Free Parking. APA Planners Press. p. 290. Cited in Pierce, G. and Shoup, D. (2013). Getting the Prices Right. Journal of the American Planning Association. 79(1), 67-81.
Transit System	3.5.4	TST-4 Increase Transit Service Frequency/Speed	0.02%-2.5% VMT reduction due to reduced headways and increased speed and reliability	Adequate	Reduction in vehicle trips due to increased transit frequency/decreased headway.	0.3%-6.3%	Handy, S. et al. (2013). Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions - Policy Brief and Technical Background Document. California Air Resources Board. Retrieved from: https://arb.ca.gov/cc/sb375/policies/policies.htm
Commute Trip Reduction	3.4.6	TRT-6 Encourage Telecommuting and Alternative Work Schedules	0.07%-5.5% commute VMT reduction due to reduced commute trips	Adequate - Effectiveness is building/tenant specific. Do not use with "TRT-1 Implement CTR Program - Voluntary" or "TRT-2 Implement CTR Program - Required Implementation/Monitoring."	VMT reduction due to adoption of telecommuting	0.2%-4.5%	Handy, S. et al. (2013). Policy Brief on the Impacts of Telecommuting Based on a Review of the Empirical Literature. California Air Resources Board. Retrieved from: https://www.arb.ca.gov/cc/sb375/policies/telecommuting/telecommuting_brief120313.pdf

NOTES:

(1) For specific VMT reduction ranges, refer to the cited literature.

STAFF REPORT – PLANNING
CITY OF VALLEJO
PLANNING COMMISSION

DATE: September 9, 2026

TO: Planning Commission

FROM: Hector Rojas, Long-Range Planning Manager

SUBJECT: **HOLD A PUBLIC HEARING TO CONSIDER A RESOLUTION RECOMMENDING THE CITY COUNCIL AMEND THE VALLEJO MUNICIPAL CODE BY ADDING CHAPTER 16.216 RELATING TO AFFORDABLE HOUSING REQUIREMENTS AND FINDING SUCH ACTION EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA GUIDELINES SECTION 15061(b)(3)**

PROJECT INFORMATION

Project Name:	Inclusionary Housing Ordinance, PLN26-0120
Project Summary:	The Project consists of adding a new chapter to Title 16 (Zoning) of the Vallejo Municipal Code to establish affordable housing requirements for residential development projects of 20 or more units. The proposed ordinance would require a modest percentage of units to be affordable to very low-, low-, or moderate-income households, while allowing alternative methods of compliance such as payment of an in-lieu fee. The ordinance would also establish affordable-unit standards, application requirements, and a waiver or adjustment process.
Location:	Citywide
Applicant:	City of Vallejo Planning and Development Services Department
General Plan Land Use Designation:	Various
Zoning District:	Various zoning districts allowing residential development
CEQA:	The Project is exempt pursuant to CEQA Guidelines Section 15061(b)(3), the common-sense exemption, because the ordinance does not change allowable land uses, density, intensity, or the physical development envelope and does not approve any particular development project.

RECOMMENDATION

Hold a public hearing to consider a Resolution recommending that the City Council amend the Vallejo Municipal Code by adding Chapter 16.216 relating to Affordable Housing Requirements and finding such action exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3).

ATTACHMENTS

1.	Staff Report
2.	Recommended Resolution
3.	Exhbit A to Recommended Resolution - Proposed Ordinance
4.	Feasibility Analysis of Inclusionary Housing Requirements
5.	Public Comments Received on Draft Inclusionary Housing Ordinance

CONTACT

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Hector.Rojas@cityofvallejo.net

BACKGROUND AND DISCUSSION

Inclusionary housing ordinances require or incentivize residential developers to provide a share of new dwelling units at rents or sale prices affordable to lower- and moderate-income households. Depending on the ordinance, developers may also satisfy some or all of the requirement through an in-lieu fee or another alternative means of compliance. Inclusionary housing is one of several tools local governments use to create mixed-income communities, expand the supply of deed-restricted affordable units, and generate local funding for affordable housing.

These programs are widely used. A 2021 national survey by Grounded Solutions Network identified 1,019 inclusionary housing programs in 734 jurisdictions, including 228 programs in 162 California jurisdictions. Among the programs reporting outcomes, 258 reported producing approximately 110,000 affordable units and 123 reported collecting approximately $1.76 billion in fees. Results vary based on program design, market conditions, and the amount of residential development occurring in a community.

On December 30, 2024, the City Council adopted the 2023-2031 Housing Element. The Housing Element explains that market-rate development can increase demand for lower-cost housing while using limited developable land, and that existing federal and State housing subsidy programs are not sufficient by themselves to meet local needs. Housing Element Program B 2.1.1 directs the City to consider adoption of an Inclusionary Housing Ordinance to address this concern. As described in Program B 2.1.1, the review process must seek developer input, conduct the necessary economic analysis, and consider an ordinance addressing project thresholds, affordability levels, compliance options, incentives, construction timing, and administration. Further, Program B 2.1.1 establishes a quantified objective of 150 lower- and moderate-income units, including at least 50 units in mixed-income developments, with emphasis on new and infill opportunities in relatively higher-resource and higher-income areas, to be provided over the course of the Housing Element’s full planning period (January 31, 2023, through January 31, 2031).

To initiate Program B 2.1.1 implementation, the City retained Economic & Planning Systems, Inc. (EPS) to conduct developer outreach and analyze inclusionary housing feasibility and in-lieu fees. EPS’s work concluded with a two-part joint study session process where their preliminary findings and feasibility analysis were shared and discussed.

On July 7, 2025, the first joint City Council and Planning Commission study session was held. At this session, EPS presented its market and feasibility findings, and Councilmembers, Commissioners, and members of the public discussed current development conditions, the potential effect of affordability requirements on housing production, the operation and administration of inclusionary programs, and possible approaches such as phased implementation, exemptions, and alternative compliance.

On November 24, 2025, a second joint City Council and Planning Commission study session was held to continue the conversation from the first session. At the conclusion of the joint study-session process, staff received direction to proceed with developing a modest Inclusionary Housing Ordinance that reflected Vallejo's current market conditions and provided flexibility in how covered projects could comply.

Staff subsequently reviewed inclusionary ordinances adopted by Pasadena, Benicia, Concord, El Cerrito, Hayward, and Richmond, and worked with EPS and the City Attorney's Office to prepare a Vallejo ordinance. The City released the draft ordinance (Attachment 3) for a 20-day public review and

comment period beginning May 7, 2026, and ending May 27, 2026. During this time, ten comment letters were received. (See the 'Notice and Comments' section below for more details).

Feasibility Analysis

EPS's final Feasibility Analysis of Inclusionary Housing Requirements (Attachment 4) is dated March 13, 2026, and was published on the City's website on May 27, 2026. The analysis includes an evaluation of five representative development prototypes using two standard return measures: 1) profit margin for ownership development; and 2) yield on cost for rental development. Although the measures differ because ownership units are sold while rental projects are held as income-producing assets, each result was compared with an industry standard threshold used to indicate whether a project is likely to attract investment. The analysis found poor conditions for new housing across the Bay Area and that most product types in Vallejo did not meet the applicable threshold even before an inclusionary requirement was applied. Of the five prototypes, only single-family detached housing was marginally feasible, with an estimated 15.13 percent profit margin compared with a 15 percent threshold.

The prototype assumptions were informed by EPS's review of recent and proposed developments, discussions with developers active in Vallejo and the surrounding region, and discussions with City staff. This input informed the prototype characteristics, the 15 percent ownership return threshold, construction-cost estimates, and market-value assumptions.

The other ownership prototypes analyzed did not meet the 15 percent profit-margin threshold: small-lot single-family detached development was estimated at 5.73 percent, and the multifamily attached condominium prototype at negative 36.50 percent. The baseline-density and higher-density multifamily apartment prototypes produced estimated yields on cost of 4.97 percent and 4.70 percent, respectively, below the 5.5 percent rental threshold. EPS noted that these are prototypical results and that the economics of an individual development may differ based on land cost, parking, financing, achievable rents or sale prices, unit mix, and other project-specific factors.

EPS concluded that imposing inclusionary requirements would generally reduce project revenue without reducing development costs and therefore make residential projects marginally less feasible. In light of the current market, EPS advised that the City could consider a modest program, alternatives to compliance, phased implementation, market-based triggers, or waiting until market conditions improve. EPS evaluated the following three requirement levels:

Table 1: Inclusionary Requirements Evaluated by EPS

Project Type	Option A	Option B	Option C
Rental, 20 or more units	5% total 1% VLI + 4% LI	4% total 2% VLI + 2% LI	6% total 2% VLI + 4% LI
Ownership, 20-100 units	5% total 3% LI + 2% MOD	7% total 4% LI + 3% MOD	10% total 5% LI + 5% MOD
Ownership, more than 100 units	8% total 5% LI + 3% MOD	10% total 6% LI + 4% MOD	15% total 7.5% LI + 7.5% MOD
Source: *EPS Feasibility Analysis, Tables 9 and 10. Notes: VLI = Very Low Income; LI = Low Income; MOD = Moderate Income.*			

The public review draft ordinance reflected Option A, which combines the lowest ownership requirements evaluated with a comparatively low rental requirement while retaining a one percent very-low-income component. Staff selected this approach in response to the joint study-session direction and EPS's finding that most prototypes were not currently feasible even without an inclusionary requirement.

Proposed Ordinance

The proposed ordinance in Attachment 3 would add Chapter 16.216 (Affordable Housing Requirements) to Title 16 (Zoning) of the Vallejo Municipal Code (VMC). It is intended to increase the production of housing affordable to very low-, low-, and moderate-income households and to generate funds that may be used for affordable housing. Vallejo's 2023-2031 Regional Housing Needs Allocation (RHNA) is 2,900 units: 690 very-low-income units; 369 low-income units; 495 moderate-income units; and 1,346 above-moderate-income units. Altogether, 1,554 units, or approximately 54 percent of the RHNA, are assigned to moderate-income households or below.

Table 2 summarizes Vallejo's progress toward meeting its 2023-2031 RHNA through the end of 2025. Of the 530 units credited toward the RHNA to date, 108 are affordable to moderate-income households or below, leaving a remaining need of 1,446 units across those three income categories.

Table 2: Progress Toward Meeting Vallejo's 2023-2031 RHNA

Income Level	Vallejo's RHNA Allocation	Projection Period (6/30/22 – 1/30/23)	2023	2024	2025	Total Units to Date	Remaining
VLI	690	4	6	10	7	27	663
LI	369	0	12	10	33	55	314
MOD	495	0	9	7	10	26	469
AMOD	1,346	144	94	41	143	422	924
Total Units:	2,900	148	121	68	193	530	2,370
Source: *City of Vallejo CY2025 General Plan Annual Progress Report. Notes: VLI = Very Low Income; LI = Low Income; MOD = Moderate Income; AMOD = Above Moderate Income*							

The proposed ordinance broadly aligns with the City's RHNA by targeting all three below-market categories (including very-low, low, and moderate affordability levels). The rental requirement includes very-low- and low-income units, while the ownership requirement targets low- and moderate-income households. The distribution is not intended to mirror the RHNA percentages exactly; rather, it balances the need for deeper affordability with EPS's finding that the affordability gap and feasibility impact increase as the required income level decreases.

Income Categories and Maximum Housing Costs

HCD updates county income limits annually and adjusts them by household size. Under the 2026 limits for Solano County, Table 3 illustrates the income categories and maximum housing costs for a three-person household, the benchmark household size generally used for a two-bedroom unit. The monthly amount represents 30 percent of gross income and is intended only as an illustration.

Table 3: Income Categories and Illustrative Maximum Housing Costs

Income Category	Maximum Annual Income	Illustrative Maximum Monthly Housing Cost
VLI	$61,850	$1,546
LI	$98,950	$2,474
MOD	$134,550	$3,364
Source: *California HCD 2026 State Income Limits for Solano County, effective June 23, 2026.* ***Notes:*** *VLI = Very Low Income; LI = Low Income; MOD = Moderate Income.*		

Ordinance Applicability

The proposed ordinance would apply to residential projects containing 20 or more units. It would exempt: 1) reconstruction of units destroyed by a natural disaster; 2) accessory dwelling units, which are regulated under a separate State and local framework; and 3) residential care facilities, which operate under a distinct residential and services model. It would also exempt applications accepted as complete before the ordinance takes effect to avoid a substantial change in development requirements for projects that are already under review. The ordinance would become effective 180 days after final passage, providing an implementation transition period for applicants and City administration.

Requirements for Rental Projects

Under the proposed ordinance, a covered rental project containing 20 or more units would be required to set aside 5 percent of its units as affordable units, consisting of 1 percent affordable to very-low-income households and 4 percent affordable to low-income households. Affordable rents would be based on 30 percent of the applicable maximum household income, less a utility allowance.

Table 4 illustrates how the rental requirements would apply to projects of varying sizes. For purposes of these examples, all fractional requirements are assumed to be rounded up and satisfied by providing the resulting affordable units on site. When a fraction is below 0.50, the proposed ordinance would allow the developer to pay an in-lieu fee instead of providing the additional affordable unit.

Table 4: Illustrative Application of Rental Requirements by Project Size

Example Rental Project	VLI Requirement	LI Requirement	Illustrative On-Site Unit Mix
20-Unit Project	20 units × 1% = 0.2 units (1 unit, if rounded up)	20 units × 4% = 0.8 units (1 unit, rounded up)	18 market-rate units 1 VLI units 1 LI unit
50-Unit Project	50 units × 1% = 0.5 units (1 unit, rounded up)	50 units × 4% = 2 units	47 market-rate units 1 VLI unit 2 LI units
120-Unit Project	120 units × 1% = 1.2 units (2 units, if rounded up)	120 units × 4% = 4.8 units (5 units, rounded up)	113 market-rate units 2 VLI units 5 LI units
300-Unit Project	300 units × 1% = 3 units	300 units × 4% = 12 units	285 market-rate units 3 VLI units 12 LI units
Notes: *Examples assume that all fractional requirements are rounded up and satisfied on site. For a fraction below 0.50, the developer may instead pay an in-lieu fee rather than provide the additional affordable unit. VLI = Very Low Income; LI = Low Income.*			

Requirements for Ownership Projects

Under the proposed ordinance, a covered ownership project containing 20 to 100 units would be required to set aside 5 percent of its units as affordable units, consisting of 3 percent affordable to low-income households and 2 percent affordable to moderate-income households. An ownership project containing more than 100 units would be required to set aside 8 percent of its units as affordable units, consisting of 5 percent affordable to low-income households and 3 percent affordable to moderate-income households.

Table 5 illustrates how the ownership requirements would apply to projects of the same sizes shown in Table 4, including examples within both applicable requirement tiers. Consistent with Table 4, the examples assume that all fractional requirements are rounded up and satisfied by providing the resulting affordable units on site. When a fraction is below 0.50, the proposed ordinance alternatively allows the developer to pay an in-lieu fee instead of providing the additional affordable unit.

Table 5: Illustrative Application of Ownership Requirements by Project Size

Example Ownership Project	LI Requirement	MOD Requirement	Illustrative On-Site Unit Mix
20-Unit Project	20 units × 3% = 0.6 units (1 unit, rounded up)	20 units × 2% = 0.4 units (1 unit, if rounded up)	18 market-rate units 1 LI unit 1 MOD unit
50-Unit Project	50 units × 3% = 1.5 units (2 units, rounded up)	50 units × 2% = 1 unit	47 market-rate units 2 LI units 1 MOD unit
120-Unit Project	120 units × 5% = 6 units	120 units × 3% = 3.6 units (4 units, rounded up)	110 market-rate units 6 LI units 4 MOD units
300-Unit Project	300 units × 5% = 15 units	300 units × 3% = 9 units	276 market-rate units 15 LI units 9 MOD units
Notes: *Examples assume that all fractional requirements are rounded up and satisfied on site. For a fraction below 0.50, the developer may instead pay an in-lieu fee rather than provide the additional affordable unit. LI = Low Income; MOD = Moderate Income.*			

In-Lieu Fee

Under the proposed ordinance, a housing developer may elect to pay an in-lieu fee instead of providing some or all of the required affordable units. This option is important under current market conditions because it gives a housing project an alternative when on-site production would create a greater design, financing, or feasibility constraint, while still requiring the development to contribute to affordable housing. Fee revenue would be deposited into a separate City fund designated for affordable housing, allowing the City to combine receipts with other funding and support a range of affordable housing activities.

EPS calculated an 'affordability gap' for each prototype and income category by subtracting the value supported by an affordable household's housing payment from the estimated cost of producing the unit. The economically equivalent in-lieu fee is the developer contribution that would produce approximately the same financial effect as providing the required units on site. For each development prototype, EPS calculated an in-lieu fee equivalent to the cost of satisfying Option A’s on-site affordable housing requirement. EPS expressed the equivalent fee in three ways: (1) per required affordable unit; (2) per

market-rate unit; and (3) per square foot of market-rate residential floor area. Staff selected the per-square-foot approach as the basis for the proposed in-lieu fee schedule in Table 6:

Table 6: Proposed In-Lieu Fee Schedule

Project Type	**Calculated In-Lieu Fee** (per market-rate residential sq. ft.)
Rental, 20 or more units	Lower-Density Apartments: $8.64 Higher-Density Apartments: $9.87
Ownership, 20-100 units	Single-Family Detached: $9.29 Single-Family Small-Lot Detached: $8.16 Multifamily Condominium: $17.08
Ownership, more than 100 units	Single-Family Detached: $15.01 Single-Family Small-Lot Detached: $13.23 Multifamily Condominium: $27.55
Source: EPS Feasibility Analysis, Option A in Tables 9 and 10. *Prototype note: EPS modeled conventional detached housing at approximately 8 units per acre and 2,200 gross square feet per unit, compared with small-lot detached housing at approximately 15 units per acre and 1,600 gross square feet per unit.*	

Table 7 illustrates how the proposed rental fee schedule would apply to the two rental development prototypes evaluated by EPS if a developer elected to pay an in-lieu fee instead of providing any required affordable units on site. Because these examples assume payment of the fee in lieu of all required affordable units, all project units would remain market-rate and the fee would apply to the project's entire assumed residential floor area. EPS modeled a lower-density apartment prototype at approximately 30 units per acre with surface parking and a higher-density apartment prototype at approximately 65 units per acre with podium parking. Both prototypes assume an average gross residential floor area of 1,200 square feet per unit, which is used to calculate the illustrative fees in Table 7. Each project would pay only the rate applicable to its development type. The fee resolution presented to the City Council would establish objective criteria for determining which rental rate applies and how the fee would be prorated when a developer provides some affordable units on site and pays a fee for the remainder.

Table 7: Illustrative Rental In-Lieu Fees by Project Type and Size

Example Rental Project	**Assumed Residential Floor Area**	**Lower-Density Apartments ($8.64/sq. ft.)**	**Higher-Density Apartments ($9.87/sq. ft.)**
20-Unit Project	24,000 sq. ft.	$207,360	$236,880
50-Unit Project	60,000 sq. ft.	$518,400	$592,200
120-Unit Project	144,000 sq. ft.	$1,244,160	$1,421,280
300-Unit Project	360,000 sq. ft.	$3,110,400	$3,553,200
Source: *EPS Feasibility Analysis, Table 9 and Appendix B.* ***Notes:*** *Illustrative fee = total units × 1,200 square feet per unit × applicable fee per square foot. Calculations use the rounded rates presented in Table 6. Actual fees would be based on the residential floor area shown in the approved project plans and the fee schedule adopted by the City Council.*			

Table 8 provides comparable examples for ownership projects of the same sizes evaluated in Table 5. The calculations apply the assumed residential floor area for each EPS ownership prototype and the fee rate corresponding to the applicable project-size tier.

Table 8: Illustrative Ownership In-Lieu Fees by Project Type and Size

Example Ownership Project	Single-Family Detached (2,200 sq. ft./unit)	Single-Family Small-Lot Detached (1,600 sq. ft./unit)	Multifamily Condominium (1,200 sq. ft./unit)
20-Unit Project	$408,760 ($9.29/sq. ft.)	$261,120 ($8.16/sq. ft.)	$409,920 ($17.08/sq. ft.)
50-Unit Project	$1,021,900 ($9.29/sq. ft.)	$652,800 ($8.16/sq. ft.)	$1,024,800 ($17.08/sq. ft.)
120-Unit Project	$3,962,640 ($15.01/sq. ft.)	$2,540,160 ($13.23/sq. ft.)	$3,967,200 ($27.55/sq. ft.)
300-Unit Project	$9,906,600 ($15.01/sq. ft.)	$6,350,400 ($13.23/sq. ft.)	$9,918,000 ($27.55/sq. ft.)

Source: *EPS Feasibility Analysis, Table 10 and Appendix B.* ***Notes:*** *Illustrative fee = total units × assumed residential square feet per unit × applicable fee per square foot. The 20- and 50-unit examples use the rates for ownership projects containing 20–100 units; the 120- and 300-unit examples use the rates for projects containing more than 100 units. Calculations use the rounded rates presented in Table 6. Actual fees would depend on the approved project floor area and the fee schedule adopted by the City Council.*

Staff recommends establishing the fee on a per-square-foot basis because this method scales the obligation to the amount of market-rate residential floor area, accommodates varying unit mixes and fractional-unit requirements, and avoids imposing a disproportionate fee on projects simply because they contain more, smaller units. The developer would elect the fee in writing with the project application and pay it before issuance of building permits. The proposed ordinance would authorize the City Council to establish the fee by resolution. That fee resolution is not included with this Planning Commission report but will accompany the proposed ordinance when it is presented to the City Council for adoption.

Affordable Housing Fund and Future Guidelines

In-lieu fee revenue would be deposited into a separate City fund designated for the development of affordable housing, administration of City affordable housing programs, and to administer fair housing requirements for affordable units.

If the proposed ordinance is adopted, staff anticipates returning to the City Council with proposed administrative guidelines before any fee revenue is expended. The guidelines could address eligible uses and priorities, eligible applicants, project-selection criteria, permissible forms of financial assistance, financial controls, and public reporting. The final guidelines would be coordinated with the City Attorney's Office and Finance Department and remain within the authority established by the final ordinance and fee resolution.

Other Forms of Alternative Compliance

The proposed ordinance would also allow a developer to request approval to construct affordable units off-site within the same census tract. Keeping the units within the same census tract would maintain a geographic connection to the market-rate project, support mixed-income development within the surrounding area, and reduce the potential for affordable units to be shifted to and concentrated in other parts of the city. The final decision-making body for the development project (either the Planning Commission or, when the project requires City Council action, the City Council) could approve the request upon finding that off-site construction equally or better serves the City’s interests. An ownership

project could alternatively provide on-site affordable rental units subject to the same requirements that would apply to a rental project.

Affordable Unit Standards

Affordable units would generally be proportional to the market-rate units in bedroom mix and size, dispersed throughout the project to the extent feasible, comparable in construction quality and exterior design, and provided equal access to on-site amenities. The affordable units would need to be constructed and occupied before or concurrently with the market-rate units unless an alternative schedule is approved by the final decision-making body for the development project. Both rental and ownership affordable units would be restricted for a minimum of 55 years unless a different affordability period is required by applicable State or federal law. A 55-year minimum provides long-term affordability through multiple occupancy cycles and is consistent with a commonly used term for California affordable housing covenants while avoiding the legal and administrative complexities of a perpetual restriction.

Program Administration and Fiscal Impact

A covered project would be required to submit an Affordable Housing Plan as part of its development application identifying the required units, calculations, locations, income targets, phasing, and marketing approach. As a condition of project approval, the developer would execute an Affordable Housing Agreement addressing the number, size, location, tenure, income targeting, monitoring, and resale or rental restrictions applicable to the affordable units. For a project with a parcel or tentative map, the agreement would be recorded concurrently with the final map; for a project without such a map, it would be recorded before issuance of a building permit. An agreement for off-site units would be recorded simultaneously against the off-site property. A waiver or adjustment would remain available if a developer demonstrates that the requirements lack a reasonable relationship to the project's impacts or would result in an unconstitutional taking.

The amount of future in-lieu fee revenue cannot be estimated because it is dependent upon the number, type, and size of covered residential projects and the compliance options selected by future housing developers. Fee revenue would be restricted to authorized affordable housing purposes. The proposed ordinance would also allow an Affordable Housing Agreement to provide for recovery of City implementation and monitoring costs.

Program administration will require staff resources for application and agreement review, household eligibility verification, affordability monitoring, fee accounting, and required reporting. Staff would use the proposed ordinance's 180-day implementation period to prepare initial forms and procedures. The need for additional staffing or consultant support cannot be determined until the City has experience with the volume and complexity of covered projects.

Implementation, Reporting, and Periodic Evaluation

Government Code Section 65906.6 requires a local agency that collects inclusionary housing in-lieu fees to publish annually the amount collected and whether the funds are intended for a specific project. Every five years, the agency must also report the total amount collected during that period and identify projects funded with the fees. The City would incorporate these requirements into program administration and public reporting.

After sufficient implementation experience, staff proposes an initial program evaluation after approximately three years, or earlier if the City has processed enough covered projects to support a meaningful review. The evaluation could consider residential applications and approvals, affordable units produced, use of alternative compliance options, fee revenue collected and expended, administrative costs, and market conditions. Any recommended ordinance or fee changes would return to the Planning Commission and City Council as required.

CODE COMPLIANCE

The City Council is expressly authorized to adopt, as a condition of development, inclusionary housing requirements applicable to residential rental units affordable to moderate-, lower-, very low-, and extremely low-income households, as those income categories are defined in Health and Safety Code Sections 50079.5, 50093, 50105, and 50106, so long as alternative means of compliance are provided such as in-lieu fees, land dedication, off-site construction, or acquisition and rehabilitation of existing units. (See Cal. Gov. Code § 65850(g).) The proposed ordinance provides two of these alternatives: payment of an in-lieu fee and off-site construction.

VMC Section 16.611.02(D) requires proposed Zoning Code amendments to be reviewed and recommended by the Planning Commission at a duly noticed public hearing before City Council consideration.

To recommend adoption of a Zoning Code text amendment, the Planning Commission must find under VMC Section 16.611.03(A) that:

1. The ordinance amendment is consistent in principle with the General Plan and any applicable specific plan; and

2. The ordinance amendment is consistent with the purpose of the Zoning Code to promote the growth of the city in an orderly manner and to protect the public health, safety, and general welfare.

Staff Analysis

The proposed ordinance is consistent in principle with the General Plan because it directly implements Housing Element Program B 2.1.1, which directs the City to evaluate and consider adoption of an inclusionary housing ordinance to increase the production of housing to lower- and moderate-income households. The proposed ordinance is also intended to contribute to the Housing Element's quantified objective of producing 150 lower- and moderate-income units, including at least 50 units in mixed-income developments, during the Housing Element planning period. Because future development activity and the compliance options selected by developers cannot be predicted, the ordinance's contribution toward that objective cannot be quantified at this time.

The proposed ordinance is consistent in principle with General Plan policies that support expanding housing opportunities and increasing access to affordable housing. Policy A.1 calls for the City to provide opportunities for new housing sufficient to meet its share of regional housing demand at all income levels. Policy A.4 supports a variety of housing types, including rental and ownership opportunities for moderate- and above-moderate-income households. Policy B.1 calls for continued efforts to expand housing opportunities for all residents, including households unable to afford market-rate housing, and Policy B.2 supports the provision of financial or other assistance for the development

of affordable housing units. Policy F.1 calls for equal access to housing opportunities and housing options for households across a range of income levels, densities, and housing types to meet the diverse needs and preferences of the community. And Policy H.4 supports promoting a healthy balance of housing within neighborhoods by encouraging a mix of affordable and market-rate housing. The proposed ordinance advances these policies by establishing affordable housing requirements for covered residential development, providing alternative means of compliance, and generating in-lieu fee revenue to support affordable housing activities. The ordinance does not amend any General Plan land use or density designation, or otherwise modify the location, intensity, or physical development standards applicable to residential development. Rather, it establishes affordable housing requirements and alternative means of compliance for residential development otherwise permitted under the General Plan. No conflict with any applicable specific plan has been identified.

The proposed ordinance is also consistent with the purposes of the Zoning Code because it establishes clear standards governing affordable housing requirements for covered residential projects while providing alternative means of compliance and provisions for waivers or adjustments where authorized. The ordinance is intended to promote orderly residential development and the public health, safety, and general welfare by increasing the production of housing affordable to lower- and moderate-income households without changing General Plan land use designations, permitted residential densities, or other underlying development standards.

Policy Considerations

The proposed ordinance reflects the direction provided through the 2025 joint City Council and Planning Commission study-session process to develop a modest and flexible inclusionary housing program. The feasibility analysis and public comments identify policy tradeoffs between requiring residential development to contribute to affordable housing and avoiding additional constraints on housing production under current market conditions. On balance, staff finds that establishing an initial framework now would advance the Housing Element's objectives while allowing the City to monitor housing production, market conditions, fee revenue, affordable units created, and administrative demands. The planned program evaluation would provide data to support any future calibration of the ordinance.

NOTICE AND COMMENTS

In accordance with VMC Section 16.602.08(A), notice of the September 9, 2026 Planning Commission public hearing for this item was published in the Times-Herald and electronically distributed on August 19, 2026.

Public Comment Period

The City published the draft ordinance on May 7, 2026, for a 20-day public review and comment period ending May 27, 2026. The City received ten substantive submissions: six from individual commenters and four organizational letters, including one joint letter signed by eight community, housing, legal services, and advocacy organizations (see Attachment 5 for copies of all letters received). The comments expressed a wide range of views, from opposition to the ordinance to support conditioned on substantially stronger requirements.

Development Feasibility and Housing Production

Several individual commenters and the Building Industry Association (BIA) Bay Area opposed the draft ordinance or urged the City to proceed cautiously. These comments cited EPS's finding that most residential prototypes are currently infeasible, expressed concern that mandatory requirements and in-lieu fees would discourage investment or reduce overall housing production, and recommended that the City instead prioritize streamlining, incentives, public subsidy, fee reductions, and other measures intended to improve project feasibility. Some commenters also raised concerns regarding administrative cost and complexity, fee transparency, the effect of utility costs on affordability, the City's existing supply of subsidized housing and vouchers, and perceived public-safety impacts.

BIA Bay Area specifically urged the City not to adopt the draft ordinance. If the City moves forward, BIA recommended a voluntary, incentive-based structure supported by local density, floor-area-ratio, and parking incentives in addition to State Density Bonus Law; implementation triggers tied to verified improvement in market feasibility; requirements phased in over multiple years; in-lieu fees set materially below the economically equivalent affordability gap; differentiation by geography and housing product type; and a sunset provision with mandatory periodic re-study. BIA also urged the City to focus on streamlining entitlements, lowering impact fees, reducing parking requirements, allowing lower-cost and missing-middle housing types, using targeted public subsidies and vouchers, and partnering with nonprofit affordable housing developers on public land.

Requests to Strengthen the Ordinance

The joint letter led by Public Advocates and the Vallejo Housing Justice Coalition supported adoption of an inclusionary program but urged the City to strengthen the draft. The signatories recommended reducing the applicability threshold from 20 to 10 units; requiring a total 20 percent affordable set-aside, including 15 percent low-income and 5 percent very-low-income units; establishing an in-lieu fee formula tied to the full affordability gap described above; prioritizing on-site production; dedicating fee revenue exclusively to affordable housing and tenant-stabilizing uses; and adding implementation, enforcement, monitoring, annual reporting, and public-dashboard requirements. Fair Housing Advocates of Northern California similarly supported an inclusionary ordinance but urged a 15 to 20 percent requirement to further fair housing goals.

Implementation and Alternative Compliance

Solano-Napa Habitat for Humanity recommended adding an alternative allowing a market-rate developer to partner with an affordable housing developer to construct off-site affordable units or on-site inclusionary rental units. Another commenter who generally supported the draft ordinance requested annual reporting on units produced and in-lieu fees collected and expended, questioned the use of off-site units and the 180-day effective date, and emphasized long-term property management and maintenance.

Copies of all written comments are included in Attachment 5. Staff has not prepared individual responses to the comment letters and has not revised the public review draft in response. The comments are presented to inform the Planning Commission's consideration. The Commission may recommend adoption of the proposed ordinance as-is, recommend specified revisions to the City Council, or continue the item and direct staff to return with revisions.

ENVIRONMENTAL REVIEW

The proposed ordinance is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3), the common-sense exemption. The ordinance establishes affordability requirements and alternative means of compliance for residential development otherwise authorized under the City's General Plan, specific plans, and Zoning Code. It does not change any land-use designation or zoning district, increase allowable residential density or development intensity, modify the physical development envelope, authorize construction, or approve any particular development project.

The requirements affect the affordability and occupancy of units within future residential development but do not alter the amount, location, or physical form of development otherwise permitted by applicable land-use regulations. The authorization and collection of an in-lieu fee would not commit the City to construct, fund, or approve any particular housing project. Future residential developments and any future projects funded with in-lieu fee revenue will remain subject to CEQA as applicable. For these reasons, there is no reasonable possibility that adoption of the proposed Ordinance will have a significant effect on the environment.

CONCLUSION

Staff recommends that the Planning Commission adopt the attached Resolution recommending that the City Council adopt the proposed ordinance, as presented.

APPEAL PROCEDURE

This agenda item is a request for the Planning Commission’s recommendation to the City Council and is not subject to appeal procedures, as it is advisory in nature and does not constitute a final decision on the Project.

LEVINE ACT

This item is subject to the Levine Act. City elected and appointed officials, including candidates for City elected office, (City Officers) who have received a campaign contribution of more than $500 within 12 months prior from a party, participant, or their representatives involved in this proceeding may do either of the following: (1) disclose the contribution on the record and recuse themselves from this proceeding; OR (2) return the portion of the contribution that exceeds $500 within 30 days from the time the elected official knew or should have known about the contribution and participate in the proceeding.

All parties, participants, and their representatives must disclose on the record of this proceeding any contribution of more than $500 made to the City Officers, such as the Mayor and/or Councilmembers, within 12 months prior to the date of the proceeding. City Officers are prohibited from accepting, soliciting, or directing a contribution of more than $500 from a party, participant, or their representatives during a proceeding and for 12 months following the date a final decision is rendered.

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CITY OF VALLEJO PLANNING COMMISSION

PC26-17

A RESOLUTION OF THE PLANNING COMMISSION RECOMMENDING THAT THE CITY COUNCIL AMEND THE VALLEJO MUNICIPAL CODE BY ADDING CHAPTER 16.216 RELATING TO AFFORDABLE HOUSING REQUIREMENTS AND FINDING SUCH ACTION EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA GUIDELINES SECTION 15061(b)(3)

* *

WHEREAS, the City of Vallejo's 2023-2031 Housing Element includes Program B 2.1.1, which directs the City to seek housing developer input, conduct the necessary economic analysis, and consider an Inclusionary Housing Ordinance addressing project thresholds, affordability levels, compliance options, incentives, construction timing, and administration; and

WHEREAS, to implement Housing Element Program B 2.1.1, the City retained Economic & Planning Systems, Inc. (EPS) to conduct developer outreach and prepare an economic feasibility analysis of potential inclusionary housing requirements and in-lieu fees; and

WHEREAS, on July 7, 2025, the City Council and Planning Commission held a joint study session to receive and discuss EPS's preliminary market and feasibility findings and potential approaches to an inclusionary housing program; and

WHEREAS, on November 24, 2025, the City Council and Planning Commission reconvened for a continuation of the joint study session, after which staff received direction to proceed with developing a modest Inclusionary Housing Ordinance that reflected Vallejo's current market conditions and provided flexibility in how covered projects could comply; and

WHEREAS, the City published a draft Inclusionary Housing Ordinance for a 20-day public review and comment period beginning May 7, 2026 and ending May 27, 2026, and received ten substantive written submissions expressing a range of views regarding the proposed requirements; and

WHEREAS, EPS completed a Feasibility Analysis of Inclusionary Housing Requirements that evaluated representative residential development prototypes, alternative affordability requirements, and economically equivalent in-lieu fees under then-current market conditions; and

WHEREAS, the proposed Ordinance would add Chapter 16.216 to the Vallejo Municipal Code (VMC), apply to residential projects containing 20 or more units, establish affordable housing requirements, and provide alternative means of compliance including payment of an in-lieu fee and off-site construction; and

WHEREAS, Government Code Section 65850(g) authorizes cities to require, as a condition of residential rental development, that a percentage of units be affordable to specified income groups and requires the ordinance to provide alternative means of compliance; and

WHEREAS, in accordance with VMC Chapter 16.611, proposed amendments to the Zoning Code must first be reviewed and recommended by the Planning Commission at a duly noticed public hearing before consideration by the City Council; and

WHEREAS, notice of the Planning Commission's public hearing on the proposed Inclusionary Housing Ordinance and its accompanying CEQA determination were mailed to all persons requesting notice pursuant to Section 16.602.08 of the Vallejo Municipal Code, emailed to the members of the Planning Commission, and published in a 1/8th page advertisement in the Times-Herald, a newspaper of general circulation, on August 19, 2026, which date was not less than 10 days prior to the September 9, 2026 hearing, as required by Government Code Section 65090(a); and

WHEREAS, after giving all public notices required by State law and the VMC, the Planning Commission conducted a duly noticed public hearing on September 9, 2026, to consider and receive public testimony on the proposed Ordinance and related CEQA determination.

NOW, THEREFORE, LET IT BE RESOLVED that the Planning Commission hereby finds, determines, and resolves as follows:

Section 1. Recitals.

The foregoing recitals are true and correct, and the same are incorporated herein by reference.

Section 2. Record.

The Record of Proceedings ("Record") upon which the Planning Commission bases its recommendation includes but is not limited to: (1) the staff reports, City files and records, the EPS Feasibility Analysis of Inclusionary Housing Requirements, written public comments, and other documents prepared for the proposed Inclusionary Housing Ordinance; (2) the evidence, facts, findings, and other determinations set forth in this Resolution; (3) the Vallejo General Plan 2040 and its Final Environmental Impact Report; (4) the Addendum to the General Plan 2040 Final Environmental Impact Report adopted for the 2023-2031 Housing Element; (5) the VMC and its related environmental documents; (6) all documentary and oral evidence received at public meetings and hearings, or otherwise submitted to the City, relating to the proposed Inclusionary Housing Ordinance; and (7) all other matters of common knowledge to the Planning Commission including, but not limited to, City, State, and federal laws, policies, rules, regulations, reports, records, and projections related to development within the City of Vallejo and its surrounding areas.

The location and custodian of the records is the Planning and Development Services Department of the City of Vallejo, 555 Santa Clara Street, Vallejo, California 94590.

Section 3. California Environmental Quality Act Findings.

Based on the Record described above, and all matters deemed material and relevant before adoption of this Resolution, the Planning Commission hereby recommends that the City Council find and determine that adoption of the proposed Ordinance is exempt from the California Environmental Quality Act pursuant to CEQA Guidelines Section 15061(b)(3), the common-sense exemption. The proposed ordinance establishes affordability requirements and alternative means of compliance for residential development otherwise authorized under the

City's General Plan, specific plans, and Zoning Code. It does not change any land-use designation or zoning district, increase allowable residential density or development intensity, modify the physical development envelope, authorize construction, or approve any particular development project. The requirements affect the affordability and occupancy of units within future residential development but do not alter the amount, location, or physical form of development otherwise permitted by applicable land-use regulations. The authorization and collection of an in-lieu fee would not commit the City to construct, fund, or approve any particular housing project. Future residential developments and any future projects funded with in-lieu fee revenue will remain subject to CEQA as applicable. For these reasons, there is no reasonable possibility that adoption of the proposed Ordinance will have a significant effect on the environment, and the Planning Commission therefore recommends that the City Council determine the proposed Ordinance is exempt from CEQA pursuant to Guidelines Section 15061(b)(3).

Section 4. Findings.

In accordance with Vallejo Municipal Code Section 16.611.03.A.1 and A.2 (Required Findings, Zoning Code Text Amendments), the Planning Commission hereby makes the following findings regarding the proposed Inclusionary Housing Ordinance, as detailed in Exhibit A attached hereto and incorporated herein by reference.

A.1 The ordinance amendment is consistent in principle with the general plan and any applicable specific plan;

Facts in support: *The proposed ordinance is consistent in principle with the General Plan because it directly implements Housing Element Program B 2.1.1, which directs the City to evaluate and consider adoption of an inclusionary housing ordinance to increase the production of housing to lower- and moderate-income households. The proposed ordinance is also intended to contribute to the Housing Element's quantified objective of producing 150 lower- and moderate-income units, including at least 50 units in mixed-income developments, during the Housing Element planning period. Because future development activity and the compliance options selected by developers cannot be predicted, the ordinance's contribution toward that objective cannot be quantified at this time.*

The proposed ordinance is consistent in principle with General Plan policies that support expanding housing opportunities and increasing access to affordable housing. Policy A.1 calls for the City to provide opportunities for new housing sufficient to meet its share of regional housing demand at all income levels. Policy A.4 supports a variety of housing types, including rental and ownership opportunities for moderate- and above-moderate-income households. Policy B.1 calls for continued efforts to expand housing opportunities for all residents, including households unable to afford market-rate housing, and Policy B.2 supports the provision of financial or other assistance for the development of affordable housing units. Policy F.1 calls for equal access to housing opportunities and housing options for households across a range of income levels, densities, and housing types to meet the diverse needs and preferences of the community. And Policy H.4 supports promoting a healthy balance of housing within neighborhoods by encouraging a mix of affordable and market-rate housing. The proposed ordinance advances these policies by establishing affordable housing requirements for covered residential development, providing alternative means of compliance, and generating in-lieu fee revenue to support affordable housing

activities. The ordinance does not amend any General Plan land use or density designation, or otherwise modify the location, intensity, or physical development standards applicable to residential development. Rather, it establishes affordable housing requirements and alternative means of compliance for residential development otherwise permitted under the General Plan. No conflict with any applicable specific plan has been identified.

A.2. The zoning text amendments are consistent with the purpose of the Zoning Code to promote the growth of the city in an orderly manner and to promote and protect the public health, safety, and general welfare.

Facts in support: *The proposed Inclusionary Housing Ordinance is consistent with the purpose of the Zoning Code because it establishes uniform and predictable requirements governing the affordable housing contribution of covered residential development. The 20-unit threshold, modest affordability percentages, alternative compliance options, pipeline exemption, and waiver or adjustment process are intended to balance the City's affordable housing objectives with current development feasibility. The ordinance promotes orderly growth by integrating affordable housing into planned residential development without changing the amount or location of development allowed by the General Plan, specific plans, or Zoning Code. It promotes and protects the public health and general welfare by expanding access to stable housing, supporting mixed-income development, and establishing clear standards for affordability, construction timing, equal access to amenities, and long-term monitoring. The ordinance preserves all applicable building, fire, health, and safety requirements governing future residential development.*

Section 5. Decision.

BE IT FURTHER RESOLVED that, based on the findings set forth herein and the Record as a whole, the Planning Commission hereby recommends that the City Council amend the Vallejo Municipal Code by adding Chapter 16.216, relating to Affordable Housing Requirements, as set forth in Exhibit A, attached hereto and incorporated herein by reference.

PASSED AND ADOPTED at a regular meeting of the Planning Commission of the City of Vallejo, State of California, on the 9th day of September 2026 by the following vote, to-wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____

ANTHONY TAYLOR, CHAIRPERSON
City of Vallejo Planning Commission

Attest:

_____
KRISTIN POLLOT, AICP – SECRETARY
City of Vallejo Planning Commission

Exhibits:

A. Proposed Ordinance Amending the Vallejo Municipal Code by Adding Chapter 16.216 Relating to Affordable Housing Requirements

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF VALLEJO ADDING CHAPTER 16.216 TO THE VALLEJO MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING REQUIREMENTS

THE COUNCIL OF THE CITY OF VALLEJO DOES ORDAIN AS FOLLOWS:

SECTION 1. A new Chapter 16.216 is hereby enacted to read as follows:

Chapter 16.216
AFFORDABLE HOUSING REQUIREMENTS

Section 16.216.01 Purpose.

A. *Purpose.* The purpose of this chapter is to promote the public welfare and ensure that new residential development contributes to the achievement of the city's housing goals by increasing the production of units affordable to households of moderate-, low-, and very low-income; and generating funds for the development of moderate-, low-, and very-low income housing.

B. *Findings.* The City Council finds that the citizens of the city are experiencing a housing shortage for moderate-, low-, and very-low income households. A goal of the city is to achieve a balanced community with housing available for households over a range of income levels. Increasingly, persons with moderate-, low-, and very-low incomes who work and/or live within the city are unable to locate housing at prices they can afford and are increasingly excluded from living in the city. Federal and state housing subsidy programs are not sufficient by themselves to satisfy the housing needs of moderate-, low-, and very-low income households. The city finds that the high cost of newly constructed housing does not, to any appreciable extent, provide housing affordable by moderate-, low-, and very-low income households while at the same time generates increased demand for lower wage service jobs to maintain public and/or common infrastructure, and that continued new development which does not include lower cost housing will serve to further aggravate the current housing shortage by reducing the supply of developable land. The city further finds that the housing shortage for persons of moderate-, low-, and very-low incomes is detrimental to the public health, safety and welfare, and further, that it is a public policy of the state of California as mandated by the requirements for a housing element of the General Plan, to make available an adequate supply of housing for persons of all economic segments of the community.

Section 16.216.02 Definitions.

For purposes of this chapter, the following terms shall have the meanings set forth below. Where a defined term is also defined by state statute, the state statutory definition shall control in the event

of any conflict, and this chapter shall be interpreted consistently with the most current income limits published by the California Department of Housing and Community Development ("HCD").

A. **"Affordable Housing Agreement"** means the agreement described in Section 16.216.09.

B. **"Affordable Unit"** means a dwelling unit within a residential project, or an off-site unit approved pursuant to Section 16.216.06(A)(1), that is reserved for occupancy by, and priced or rented to be affordable to, a Very Low Income, Low Income, or Moderate Income household, as applicable, pursuant to this chapter.

C. **"Area Median Income" or "AMI"** means the median family income for Solano County, adjusted for household size, as published annually by HCD pursuant to Health and Safety Code Section 50093(c).

D. **"Moderate Income" or "Moderate Income Household"** means a household whose gross income does not exceed the moderate-income limits established for Solano County, adjusted for household size, as defined in Health and Safety Code Section 50093 and as published annually by HCD.

E. **"Low Income" or "Low Income Household"** means a household whose gross income exceeds the qualifying limit for Very Low Income but does not exceed the qualifying limit for lower income households, adjusted for household size, as defined in Health and Safety Code Section 50079.5 and as published annually by HCD.

F. **"Very Low Income" or "Very Low Income Household"** means a household whose gross income does not exceed the qualifying limits for very low income households, adjusted for household size, as defined in Health and Safety Code Section 50105 and as published annually by HCD.

G. **"HCD Income Limits"** means the state income limits published annually by the California Department of Housing and Community Development pursuant to Health and Safety Code Section 50093(c), as may be revised from time to time. The most recently published HCD income limits for Solano County in effect at the time of application for an affordable unit shall govern eligibility and pricing determinations under this chapter.

Section 16.216.03 Affordable Units or Fee Required.

A. *Requirement.* All residential projects of twenty (20) or more residential units shall be designed and constructed to include the number of affordable units required by Section 16.216.04, subject to the alternative means of compliance authorized by Sections 16.216.05 and 16.216.06. No application for a general plan amendment, specific plan amendment, rezoning, tentative map, use permit, variance, design review, development review, or building permit for a residential project shall be approved without compliance with this chapter.

B. *Exemptions.* This chapter shall not apply to:

1. The reconstruction of any dwelling units that were destroyed by fire, flood, earthquake or other act of nature.
2. Accessory Dwelling Units and Junior Accessory Dwelling Units.
3. Residential care facilities where otherwise regulated by this title.
4. A land use/development application that has been accepted as complete prior to the effective date of this chapter.

Section 16.216.04 Number of Affordable Units.

A. The number of affordable units required in a residential project are as follows:

1. *Rental Projects of 20 or More Units.* A rental project consisting of twenty (20) or more dwelling units shall include one (1) percent of the total number of dwelling units for rent to households earning not more than Very Low Income; and four (4) percent of the total number of dwelling units for rent to households earning not more than Low Income. Monthly rents shall not exceed one-twelfth (1/12) of thirty percent (30%) of the applicable maximum annual household income, less a monthly utility allowance, as determined by the City.

2. *Ownership Projects of 20-100 Units.* An ownership project consisting of twenty (20) to one hundred (100) dwelling units shall include affordable units for sale to households earning not more than Low Income in an amount equal to three (3) percent of the total number of dwelling units, and affordable units for sale to households earning not more than Moderate Income in an amount equal to two (2) percent of the total number of dwelling units.

3. *Ownership Projects of Over 100 Units.* An ownership project consisting of more than one hundred (100) dwelling units shall include affordable units for sale to households earning not more than Low Income in an amount equal to five (5) percent of the total number of dwelling units, and affordable units for sale to households earning not more than Moderate Income in an amount equal to three (3) percent of the total number of dwelling units.

B. *Fractional Units.* The required number of affordable units shall be calculated separately for each income category specified in this section. When application of the percentages set forth above results in a fractional affordable unit, a fraction of one-half (0.50) or greater shall be rounded up to the next whole affordable unit. For a fraction of less than one-half (0.50), the developer may either (1) round up to the next whole affordable unit and provide the additional affordable unit, or (2) pay an in-lieu fee for the fractional unit. The fractional-unit fee shall be calculated by multiplying the fractional unit by the applicable in-lieu fee established by resolution pursuant to Section 16.216.05(B).

C. *Replacement Units.* If a residential project subject to the affordable housing requirements of Section 16.216.03(A) would result in the elimination of existing deed-

restricted affordable dwelling units, such units must be replaced on a one-for-one basis with equally affordable or more affordable deed-restricted units.

Section 16.216.05 In-Lieu Fees.

A. A developer proposing to construct a residential project may pay a fee in lieu of providing some or all of the affordable units required by Section 16.216.04. The option to pay in-lieu fees shall be made in writing at the time the developer submits the application for the residential project.

B. In-lieu fees shall be paid prior to issuance of building permits and shall be deposited into a separate City fund designated for the development of affordable housing. Fees may also be used for administration of City affordable housing programs. The City Council shall establish the amount of such fees by resolution.

Section 16.216.06 Alternatives.

A. The developer may request an alternative means of compliance with this chapter as part of a development application in accordance with the following provisions:

1. *Off-Site Construction.* Affordable units may be constructed on a site or sites not contiguous to the residential project, provided that such site or sites are located within the same census tract as the residential project, at the discretion of the body with review authority over the residential project upon a finding that off-site construction equally or better serves city interests because of factors involving the residential project including, but not limited to, overall project size, density, character and location, accessibility to public transportation, and proximity to retail and service establishments. The approval of off-site construction of affordable units shall be subject to Section 16.216.07(D), and such terms and conditions as may be imposed by the body with review authority.

2. *On-Site Rental Units.* When on-site inclusionary for-sale units are required by this chapter, a developer may instead construct on-site inclusionary rental units. If a developer chooses to construct on-site inclusionary rental units in lieu of on-site inclusionary for-sale units, the requirements for such on-site rental inclusionary units shall be the same as if the residential development were a rental residential development project.

Section 16.216.07 Affordable Unit Standards.

A. *Mix, Size, and Number of Bedrooms.*

1. Affordable units in an ownership project shall be proportional in unit mix including but not limited to the number of bedrooms and unit size as the market rate units. The affordable ownership units need not exceed 1,400 square feet and three bedrooms when included in a development of market rate units for ownership that exceed 1,400 square feet and three bedrooms.

2. Affordable units in rental projects shall be proportional in unit mix including but not limited to the number of bedrooms and unit size as the market rate units. The affordable rental units need not exceed 1,000 square feet and three bedrooms when included in a development of market rate rental units that exceed 1,000 square feet and three bedrooms.

B. *Location and Design.* Affordable units shall be dispersed throughout a residential project to the extent feasible and be comparable in construction quality and exterior design to the market rate units. However, interior materials and appliances may differ in quality.

C. *Equal Access.* The affordable units shall have equal access to all on-site amenities available to market rate units.

D. *Timing of Construction.* All affordable units must be constructed and occupied prior to or concurrently with the construction and occupancy of market rate units unless an alternative construction timing schedule has been approved by the body with review authority. Off-site affordable units shall be constructed and occupied in accordance with the timing schedule approved pursuant to Section 16.216.06(A)(1).

E. *Duration of Affordability Requirement.* Affordable units shall be legally restricted to occupancy by households of the income levels for which the units were designated, for a minimum period of 55 years from the date of first occupancy for rental units, and 55 years from the date of first sale for owner-occupied units, unless the requirements of a California law require a shorter period of duration.

Section 16.216.08 Eligibility for Occupancy of Affordable Units.

A. *General Eligibility.* No household may occupy an affordable unit unless the city or its designee has approved the household's eligibility or has failed to make a determination of eligibility in accordance with the applicable affordable ownership and resale restrictions. If the city or its designee maintains a list or identifies eligible households, initial and subsequent occupants shall be selected first from the list of identified households, in compliance with any rules approved by the city.

B. *Occupancy as Principal Residence.* A household who occupies a rental affordable unit or who purchases an affordable unit in an ownership project shall at all times occupy the unit as the household’s principal residence.

Section 16.216.09 Affordable Housing Agreement Requirement.

A. *Affordable Housing Agreement.* Each developer of a residential project providing affordable units pursuant to this chapter, as a condition of approval, shall execute an Affordable Housing Agreement in the form provided by the city. Each Affordable Housing Agreement shall include the following:

1. A description of the residential project, including whether the affordable units will be rented or owner-occupied;

2. The number, size and location of the affordable units;

3. Provisions and/or documents for resale restrictions, deeds of trust, right of first refusal or rental restrictions;

4. Provisions for monitoring the ongoing affordability of the affordable units, and the process for qualifying prospective resident households for income eligibility;

5. Any additional obligations relevant to the compliance with this chapter; and

6. Provision for the city to recoup costs for implementation and monitoring of the Agreement.

B. *Recording of Agreement.* Each Affordable Housing Agreement shall be recorded against owner-occupied affordable units and the residential projects containing rental affordable units. Additional rental or resale restrictions, deeds of trust, rights of first refusal and/or other documents acceptable to the city shall also be recorded against owner-occupied affordable units. In cases where the requirements of this chapter are satisfied through the development of off-site affordable units, the Affordable Housing Agreement shall simultaneously be recorded against the property where the off-site units are to be developed.

C. *Time of Recordation.* For residential projects for which a parcel or tentative map has been approved, the Affordable Housing Agreement shall be recorded concurrently with the recording of the final map for the residential project. For residential projects not subject to parcel or tentative maps, the Affordable Housing Agreement shall be recorded prior to the issuance of a building permit.

D. *Purchasers of Affordable Units.* Each purchaser of an affordable unit in an ownership project, whether that purchaser bought the affordable unit from the developer or from a previous owner of the affordable unit, shall be required to execute an agreement in the form provided by the city which contains resale restrictions including, but not limited to, restrictions on who may purchase the affordable unit and restrictions on the maximum sales price permitted on resale. The resale restrictions may also allow the city a right of first refusal to purchase the affordable unit. This agreement shall be recorded against the affordable unit as part of the closing documents for the sales transaction.

Section 16.216.10 Affordable Housing Plan Application.

A. *Applications.* Applications for residential projects subject to this chapter shall include an Affordable Housing Plan. The Affordable Housing Plan shall identify the method or combination of methods proposed to satisfy the affordable housing requirements of Section 16.216.04, including the provision of on-site affordable units, payment of in-lieu fees pursuant to Section 16.216.05, off-site construction pursuant to Section 16.216.06(A)(1), or another alternative means of compliance authorized by this chapter. The Affordable Housing Plan shall include the following information, as applicable, in addition to information otherwise required under this title.

B. *Required Affordable Housing Plan Information:*

1. The location, structure, proposed occupancy (rental or ownership) and size of the proposed market rate and affordable units, if affordable units are proposed to be provided;

2. The calculations used to determine the number of required affordable units, including the calculations for each applicable income category;

3. A floor plan or site plan depicting the location of the affordable units, if affordable units are proposed to be provided on-site;

4. The income level targets for each affordable unit, if affordable units are proposed to be provided;

5. For phased developments, a phasing plan identifying the timing and method of compliance with the affordable housing requirements;

6. A marketing plan stating how qualified households will be reviewed and selected to either purchase or rent the affordable units, if affordable units are proposed to be provided;

7. If the developer proposes to satisfy any portion of the affordable housing requirements through payment of an in-lieu fee, documentation identifying the number of affordable units for which the fee will be paid and the applicable fee calculation pursuant to Section 16.216.05; and

8. Any other information requested by the Planning and Development Services Director that is reasonably necessary to assist in the evaluation of the Affordable Housing Plan for compliance with the standards of this chapter.

Section 16.216.11 Waiver or Adjustment.

Notwithstanding any other provision in this chapter, the requirements of this chapter shall be waived or adjusted if the developer demonstrates that there is no reasonable relationship between the impact of a proposed residential project and the requirements of this chapter, or that applying the requirements of this chapter would take property in violation of the United States or California Constitutions. To receive a waiver or an adjustment, the developer must include all relevant information in support of the waiver or adjustment at the time the developer submits its application for the residential project. The developer shall also present all arguments in support of the waiver or adjustment before the city body with review authority over the residential project.

SECTION 2. CEQA.

Based on the Record described above, and all matters deemed material and relevant before adoption of this Ordinance, the City Council hereby finds and determines that adoption of the proposed Inclusionary Housing Ordinance is exempt from the California Environmental Quality Act pursuant to CEQA Guidelines Section 15061(b)(3), the common-sense exemption. The proposed Ordinance establishes affordability requirements and alternative means of compliance for residential development otherwise authorized under the City's General Plan, specific plans, and

Zoning Code. It does not change any land-use designation or zoning district, increase allowable residential density or development intensity, modify the physical development envelope, authorize construction, or approve any particular development project. The requirements affect the affordability and occupancy of units within future residential development but do not alter the amount, location, or physical form of development otherwise permitted by applicable land-use regulations. The authorization and collection of an in-lieu fee would not commit the City to construct, fund, or approve any particular housing project. Future residential developments and any future projects funded with in-lieu fee revenue will remain subject to CEQA as applicable. For these reasons, there is no reasonable possibility that adoption of the proposed Ordinance will have a significant effect on the environment. This determination reflects the City's independent judgment and analysis.

SECTION 3. Severability.

If any section, subsection, sentence, clause, phrase or word of this Ordinance is for any reason held to be invalid by a court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance. The City Council hereby declares that it would have passed and adopted this Ordinance, and each and all provisions hereof, irrespective of the fact one or more provisions may be declared invalid.

SECTION 4. Effective Date.

This Ordinance shall take effect and be in full force and effect from and after one hundred and eighty (180) days after its final passage.

PASSED and ADOPTED by the City Council of the City of Vallejo at a regular meeting held on the ___day of _____, 2026.

Economic & Planning Systems, Inc.
The Economics of Land Use

FEASIBILITY ANALYSIS OF INCLUSIONARY HOUSING REQUIREMENTS

REPORT

Prepared for:
City of Vallejo

Prepared by:
Economic & Planning Systems, Inc.

March 13, 2026

EPS #231030

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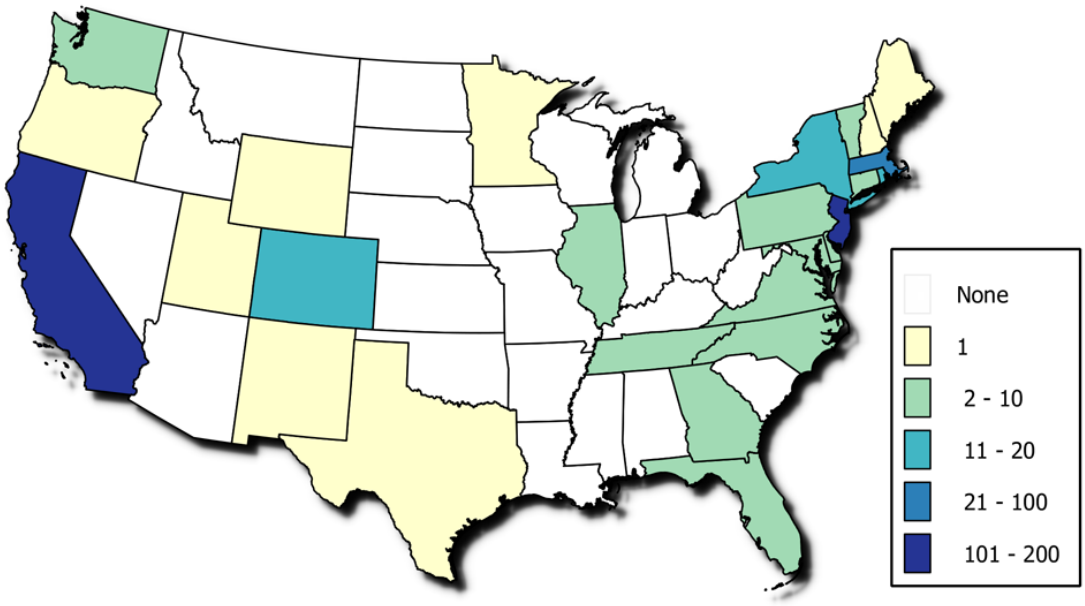
1. Introduction and Summary of Findings

Inclusionary housing programs require that new market-rate residential development projects include a certain percentage of housing units at rents or sale prices that are affordable to lower-income households. These program requirements often vary for different product types and/or different tenures and also may include the option for new development to pay a fee in lieu of providing affordable units on-site, as an alternative means of compliance. First implemented in 1974, inclusionary housing programs have been adopted by hundreds of jurisdictions nationwide, including more than 100 cities and counties in the State of California (**Figure 1**). They are one of many tools that cities can use to achieve more affordable housing in their communities.

Figure 1 Total Inclusionary Zoning Programs by State

Figure 1: While many states have IZ programs, the distribution is heavily concentrated. Most states have between 1 and 10 programs, while New Jersey and California both have over 100. Hawaii has one program and Alaska has none.



Source: National Housing Conference, 2017.

The City of Vallejo does not currently have an inclusionary zoning ordinance but has recently opted to explore adopting one as a housing program from its recent 6th Cycle Housing Element. Economic & Planning Systems, Inc. (EPS) was retained by the City to conduct an economic feasibility study to determine what level of updated inclusionary requirements or equivalent in-lieu fees may be supportable in Vallejo in the context of current market conditions.

EPS analyzed how the inclusion of below-market-rate (BMR) units impacts the financial feasibility of new market-rate residential development by evaluating several options for a new inclusionary program using industry standard profit and return metrics. Such an analysis is intended to provide the City with context regarding the implications of adopting such requirements and potential unintended impacts on impeding new development. In addition, cities introducing or updating inclusionary housing programs often consider the requirements and fees set by their "peer cities." **Appendix A** presents comparisons of inclusionary requirements and in-lieu fees for rental and ownership projects in several cities in the Bay Area, including others in Solano County.

The key findings and recommendations stemming from the feasibility analysis are summarized below. The subsequent chapters of this report provide details on the methodology and assumptions underlying the feasibility analysis, the results of the feasibility analysis, and the recommendations for inclusionary requirements by development product type that align with the feasibility findings.

Key Findings

1. **Market conditions for constructing new market-rate housing are currently poor across the Bay Area.** Construction costs have been rising faster than rents have been growing, and the production of new housing has slowed dramatically in recent years.

2. **Most building types in Vallejo currently face feasibility challenges, except for single-family detached homes.** This is due to combination of reasons, including high construction costs and the lower achievable market-rate sale prices and rents in Vallejo compared to much of the Bay Area. As a result, most types of projects do not meet the minimum returns that most developers require in order to move a project forward, even if all the units are offered at market rate prices.

3. **Inclusionary housing requirements will make new housing developments projects marginally less feasible.** By requiring some units to be sold or rented for less than they otherwise might, inclusionary housing programs reduce the revenues achievable from new development while not generally changing the costs of development. Thus, a developer's return on investment decreases under an inclusionary program, and may diminish so much that the project is no longer an attractive investment and thus does not happen.

4. **Under near-term market circumstances, the City may consider starting with a modest inclusionary program.** Comparable Bay Area jurisdictions have rental requirements ranging from 6 to 10 percent and for-sale requirements ranging from 10 to 15 percent. Many of these requirements were adopted (or updated) several years ago under macroeconomic conditions different from

today. City staff identified several options of inclusionary programs to consider, which range from a total requirement of 4 to 6 percent BMR units for rental projects, and 5 to 10 percent BMR units for for-sale projects. These options are estimated to yield a cost ranging from approximately $8 to $50 per square foot of the market-rate units, and these figures (detailed on **Table 9** and **Table 10**) and can serve as the maximum allowable in-lieu fees.

5. **The City may consider incorporating alternatives to compliance, phasing in requirements, or waiting until market conditions improve to implement inclusionary housing requirements.** Due to current findings of market challenges, there is the concern that inclusionary requirements may suppress new housing production. However, phasing in requirements based on market indicators and/or setting an in-lieu fee that is modest relative to the cost of providing units on-site may be effective at minimizing negative feasibility impacts.

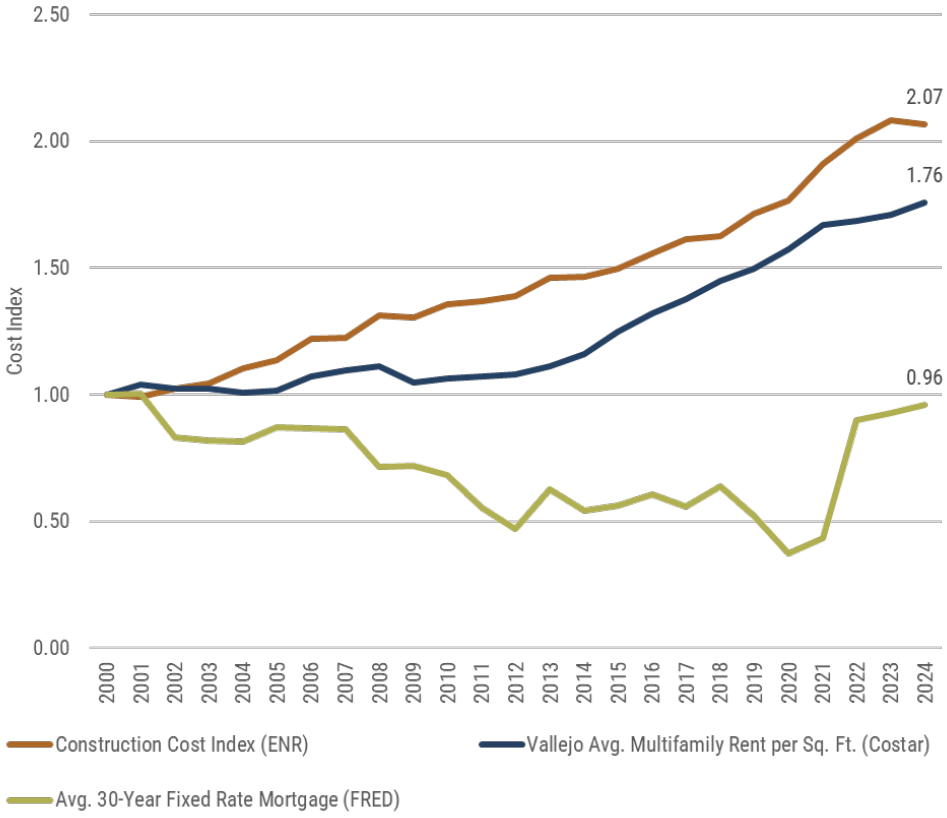
2. Background and Local Market Context

Housing Market Conditions and Challenges

The housing market in the Bay Area has encountered recent economic challenges that make it difficult to build new housing. In the last several decades, the rise in construction costs has outpaced market-rate rent growth, meaning that it is now more expensive than ever to build a new housing unit, with a diminishing level of returns. Vallejo is particularly challenged due to rents that are lower than the Bay Area average.

Several pieces of data demonstrate this trend. **Figure 2** shows the trends of construction costs, Vallejo's average multifamily rents, and the average 30-year fixed-rate mortgage, indexed from 2000 to 2024. Since 2000, construction costs have risen steadily and rents have not kept up at the same rate. When financing costs were lower, some projects could still proceed, but recent increases in interest rates have thwarted much new investment.

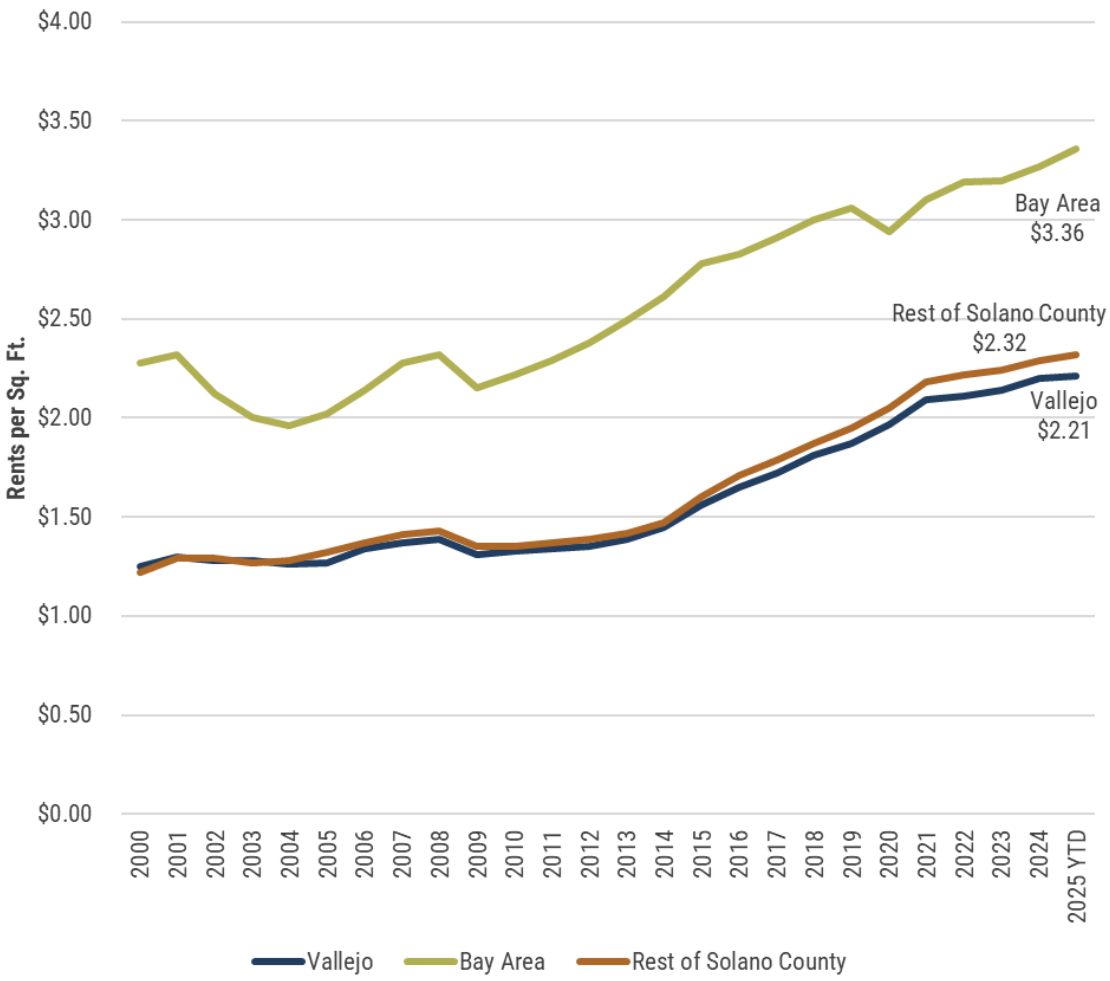
Figure 2 Index of Construction Costs, Multifamily Rents, Mortgage Rates, 2000 to 2024



Source: CoStar; Engineering News-Record; Federal Reserve Economic Data; Economic & Planning Systems.

Vallejo's multifamily rents have also not increased at the same pace as in the rest of Solano County and the Bay Area generally, as shown in **Figure 3**. On a per-square foot basis, the monthly rent for a multifamily unit in Vallejo is $2.21, which is 34 percent lower than the median in the Bay Area region ($3.36) and 5 percent lower than the rest of Solano County ($2.32). While this keeps current units in the city affordable, especially to lower-earning households, lower rent also means that new market-rate construction in Vallejo may be less competitive or attractive for developers in relation to nearby cities. This is especially critical as an inclusionary program relies on ongoing market-rate activity to deliver affordable units.

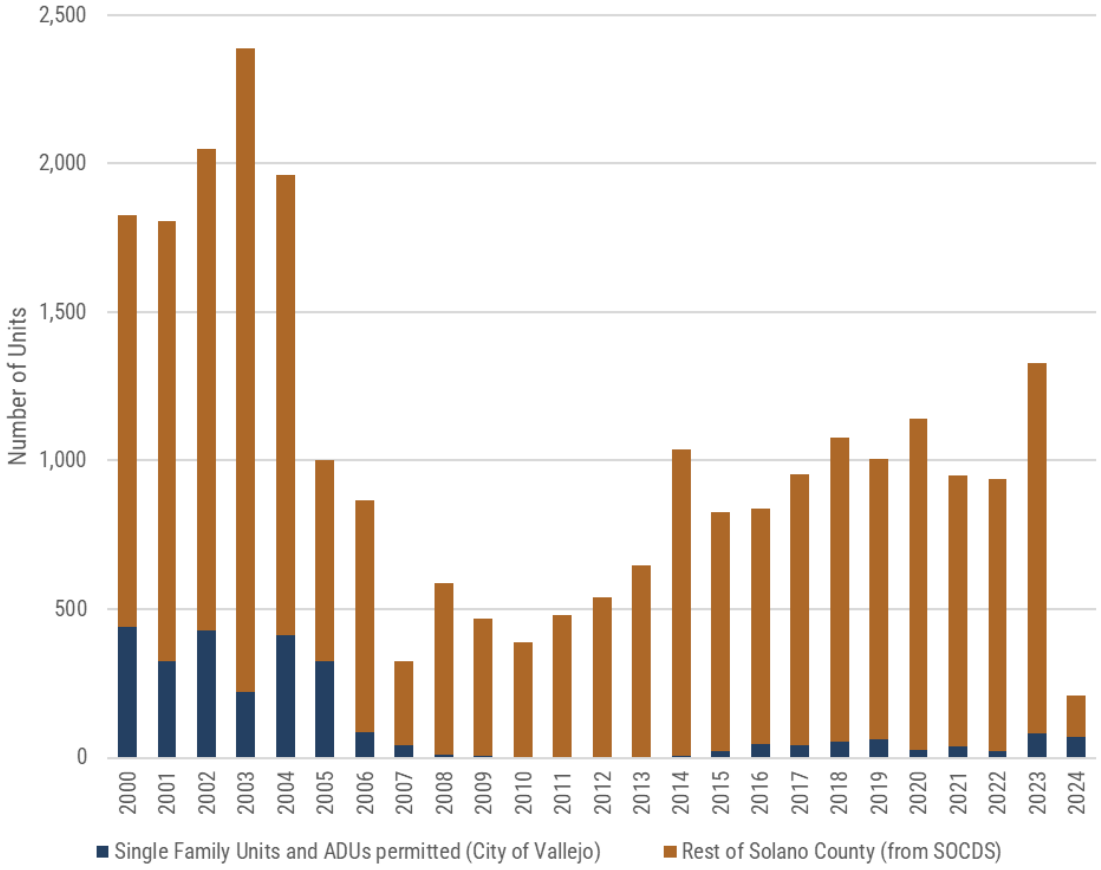
Figure 3 Multifamily Rents per Square Foot, 2000 to 2025



Source: CoStar; Economic & Planning Systems

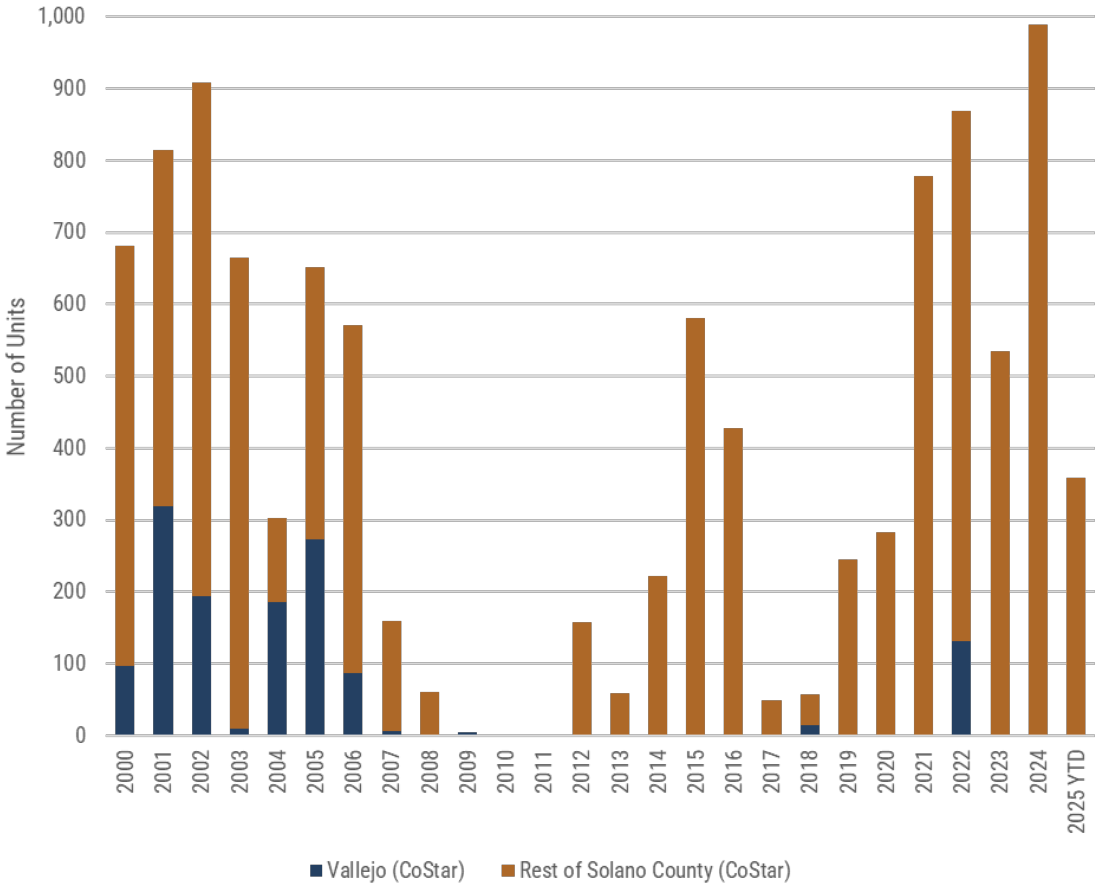
Finally, even as other cities in Solano County have picked up in development activity in the last decade, Vallejo lags behind. **Figure 4** and **Figure 5** show the single-family (and accessory dwelling units) permitted and multi-family units under construction in the county from 2000 to 2024. Vallejo now has a much smaller market share compared to the early 2000s, despite being Solano County's most populous city.

Figure 4 Single Family Units and ADUs Permitted in Solano County, 2000 to 2025



Source: City of Vallejo; U.S. Department of Housing and Urban Development (HUD); Economic & Planning Systems.

Figure 5 Multifamily Units Under Construction in Solano County, 2000 to 2025



Source: CoStar; Economic & Planning Systems.

Housing Regulatory Context

Regional Housing Needs Allocation

The State of California requires every jurisdiction to adequately plan for its community's housing needs, as specified by the Regional Housing Needs Allocation (RHNA), which determines the amount of housing units needed for each jurisdiction by income category.

Vallejo has an allocation of 2,900 total units to be permitted between 2023 and 2031. **Table 1** displays the RHNA breakdown by income levels. The allocation is slightly concentrated in affordable units, with 54 percent of the total units at Moderate Incomes or below. Inclusionary housing programs can help cities achieve their RHNA numbers in the lower-income affordability categories, as long as market-rate or typically "Above Moderate" income units are also being constructed

Table 1 RHNA Allocation for Vallejo, 2023-2031

Affordablility Category	Units	Percentage
Very Low Income	690	23.8%
Low Income	369	12.7%
Moderate Income	495	17.1%
Above Moderate	1,346	46.4%
Total	**2,900**	**100.0%**

Source: California HCD; Economic & Planning Systems, Inc.

6th Cycle Housing Element

The City of Vallejo adopted its 6th Cycle Housing Element (2023-2031) in December 2024. This policy document, mandated by the State of California, requires cities to identify policies and strategies required to meet current RHNA numbers. Within the Element, Vallejo has **Program B.2.1.1. Inclusionary Housing Ordinance**, which commits the City to exploring an inclusionary housing strategy and options, with a goal of creating 150 lower- and moderate-income units, with at least 50 in mixed-income developments. As stated in Vallejo's Housing Element:

> *"To address the need for affordable housing, and as outlined by the City's Housing Strategy, the City will prepare a nexus study, research an inclusionary housing ordinance, and seek developer input prior to drafting an ordinance."*

Household Incomes and Affordability

HCD Income Limits

Affordable rents and sale prices for below-market-rate units are based on maximum housing costs affordable to households at various household income levels. Income levels are set by the California Department of Housing and Community Development (HCD) on an annual basis. According to the 2025 HCD Income Limits for Solano County (**Table 2**), the Area Median Income (AMI) is defined as $113,200 for a household of four.

Table 2 Solano County 2025 Income Limits by Persons in Household

Affordability Category	Maximum Percentage of County Median	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Acutely Low Income	0% - 15%	$13,100	$14,950	$16,850	$18,700	$20,200	$21,700	$23,200	$24,700
Extremely Low Income	30%	$28,850	$33,000	$37,100	$41,200	$44,500	$47,800	$51,100	$54,400
Very Low Income	50%	$48,100	$54,950	$61,850	$68,700	$74,200	$79,700	$85,200	$90,700
Low Income	80%	$76,950	$87,950	$98,950	$109,900	$118,700	$127,500	$136,300	$145,100
Median Income	100%	$87,200	$99,700	$112,150	$124,600	$134,550	$144,550	$154,500	$164,450
Moderate Income	120%	$104,650	$119,600	$134,550	$149,500	$161,450	$173,400	$185,400	$197,350

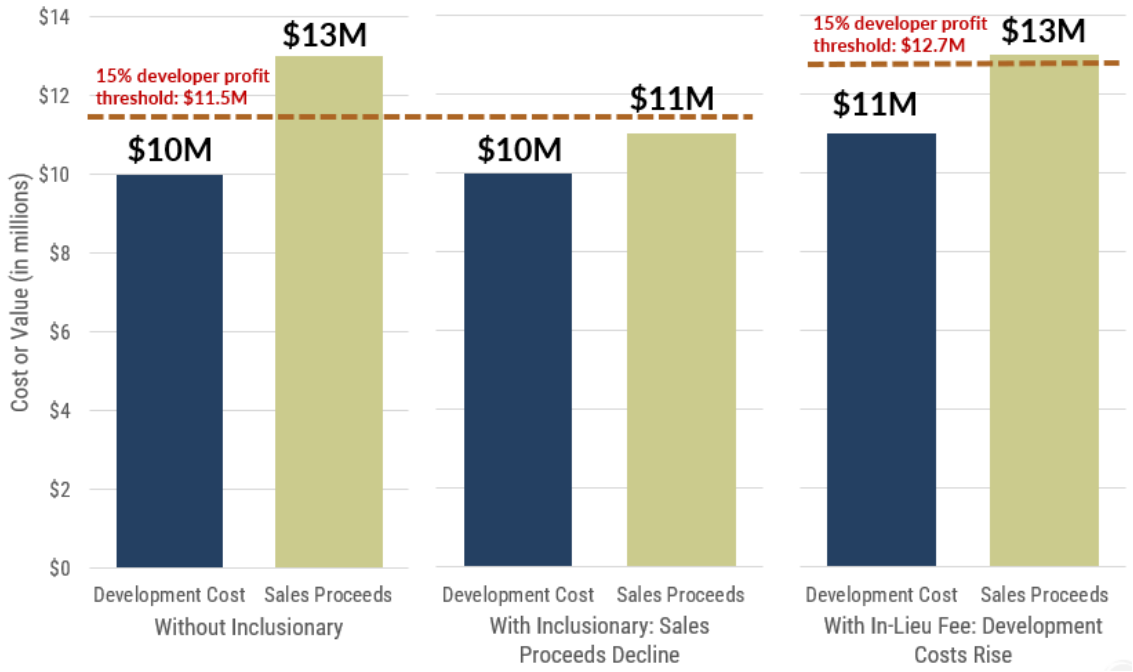
Sources: CA Department of Housing and Community Development; Economic & Planning Systems, Inc.

3. Methodology and Assumptions

In an inclusionary program, developers are required to set aside a portion of their units for lower-income households. When a developer builds the affordable units within a project that is primarily market-rate units, the project's construction costs are not significantly affected. However, the revenue the developer can expect from the affordable units is less than the revenue from the market-rate units. The developer is, in effect, subsidizing the development of the affordable units with revenue from the market-rate units. The subsidy is greater for units affordable to Very Low-income households than it is for Low-income households and Moderate-income households.

In many jurisdictions, the developer may be given an option to pay a fee in lieu of providing the units on site. When a developer pays an in-lieu fee, all the units are sold or rented as market-rate units, so the revenue potential is not affected. However, the construction costs are affected by the amount of the in-lieu fee. **Figure 6** provides an illustrative example of how these different options affect the developer's sales proceeds on a for-sale project, assuming a 15 percent profit threshold is required for feasibility and to attract investment that allows the project to proceed. In this example, the project exceeds the feasibility threshold without any inclusionary requirements or with an in-lieu fee but is infeasible if inclusionary units are added. Given a choice, a developer is likely to pay the in-lieu to meet the city's affordable housing requirement.

Figure 6 Illustration of Impacts on Feasibility



Source: Economic & Planning Systems

Return Metrics and Feasibility Threshold

Inclusionary housing programs are only able to deliver affordable units if new market-rate residential development is occurring and can achieve prices or rents that support the additional costs of including affordable units. Therefore, before evaluating the development feasibility of updates to the City's inclusionary housing program, EPS evaluated the local residential market activity. This evaluation provides a sense of the types of market-rate development that are occurring along with the prevailing sales prices and rents of new residential development.

The assessment of financial feasibility for real estate development products is based on calculating financial return metrics and comparing them against typical industry target thresholds. In the case of residential development, relevant return metrics are based on comparing total project revenues to total project construction costs.

This analysis establishes a feasibility threshold based on two standard return metrics used by real estate developers. These return metrics reflect the value of the investment in a project, and are a critical element in informing a developer's "go/no-go" decision to proceed with development:

- For ownership, or for-sale housing products (typically single family detached and attached homes, including townhomes and

condominiums), the feasibility threshold is based on the return metric of "profit margin," calculated as the percentage by which total project value (sales proceeds) exceeds total project cost. Based on EPS research and feedback from developers active in Solano County, the analysis assumes that developers in Vallejo and the surrounding region will require at least a 15 percent profit margin on for-sale development projects. Therefore, any project attaining a profit margin at or above 15 percent would be considered feasible in this analysis and could arguably support some inclusionary requirement.

- For rental housing products (typically, multifamily apartments), the feasibility threshold is based on the return metric of "yield on cost," calculated by dividing the annual net operating income (NOI) by the total costs of development. Based on EPS research and experience, the analysis assumes that developers in Vallejo and the surrounding region will require a yield on cost of at least 5.5 percent.

It is important to note that these return metrics do not specifically account for the time value of money and are based on the assumption that a project could be entitled, constructed, and sold or leased in a standard rather than attenuated timeline.

Product Prototypes

The prototype residential products used in the feasibility analysis were informed by EPS research on the local housing market. Research included review of recent developments and proposed projects, discussions with developers active in the region, and discussions with City staff. The characteristics for the prototype development products used in this analysis are summarized in **Table 3**. They include two rental prototypes: lower baseline density multifamily apartments (30 units/acre) and higher-density multifamily apartments (65 units/acre). There are three for-sale prototypes –single-family detached homes, single-family small lot homes, and condominiums. A recently constructed example of each prototype specific to the City of Vallejo is also given, if available.

The unit characteristics for each prototype are meant to represent average unit sizes, with the resulting analysis demonstrating feasibility for an average residential project of that product type. However, any specific project will have its own cost and revenue factors that may be impacted in part by its unit mix and design characteristics.

Table 3 City of Vallejo Prototype Residential Products

Item	Single Family Detached	Small Lot Single Family Detached	Multifamily Attached Condominium	Baseline Density Multifamily Apartment	Higher Density Multifamily
Tenure	Ownership	Ownership	Ownership	Rental	Rental
Building Type	Detached	Detached	Multifamily	Multifamily	Multifamily
Density (units/acre)	8	15	30	30	65
Unit Square Feet (gross)	2,200	1,600	1,500	1,200	1,200
Unit Square Feet (net)	2,200	1,600	1,200	950	950
Number of Bedrooms	4	3	2	2	2
Parking per Unit	2	2	1.5	1.5	1.5
Parking Type	Attached Garage	Attached Garage	Podium	Surface	Podium
Vallejo Example	201 Rollingwood Dr			1765 Broadway	2118 Sacramento St

Source: City of Vallejo; Costar; EPS discussions with local active developers

Developer Cost Assumptions

Housing construction costs categories include land acquisition, site preparation, hard costs (e.g., construction labor and materials), and indirect or "soft" costs (e.g., architecture, entitlement, marketing, etc.). For multifamily projects that include a structured garage or separate surface lot, EPS also defines parking costs per unit as a separate line item. Data from recent developments and land transactions in the local market have been combined with information from interviews with various housing developers to inform the construction cost assumptions used in this analysis. Total development costs are inclusive of construction costs (typical land costs plus "hard costs" for labor and materials plus "soft costs" for entitlement, design, financing, marketing, etc.) and the minimum developer profit. This total development cost thus represents the total unit value at or above which the developer would have financial incentive to construct this unit. **Table 4** below summarizes the estimated costs per unit for each product prototype. **Appendix B** contains detailed tables and assumptions for these costs.

Table 4 Construction Costs for Prototype Residential Products

	Single Family Detached	Small Lot Single Family Detached	Multifamily Attached Condo	Baseline Density Multifamily Apartment	Higher Density Multifamily Apartment
Construction Costs	$687,925	$544,800	$634,413	$500,313	$529,887
Development Costs (with 15% developer profit)	$791,114	$626,520	$729,575	n/a	n/a

Source: CoStar; Redfin, Economic & Planning Systems.

Market Value Assumptions

To understand how inclusionary requirements affect overall project value, EPS also estimated the current market value of units in Vallejo for each product type.

Market-rate Rents

For rental apartments, the metric used to determine feasibility is yield-on-cost, which is calculated as annual net operating income (NOI) divided by construction costs. Annual NOI is calculated as annual rent minus annual operating expenses, which are assumed at $10,000 per market-rate unit in this analysis. Current market-rate rents for recently constructed products are reported by CoStar to be $3.06 per square foot, which equates to $2,907 per month for a 2-bedroom, 950 square-foot apartment. Assuming that the NOI must equal 5.5 percent of the total construction costs, the estimated NOI could support a construction cost of $452,436.

Market-rate Sale Prices

For the for-sale prototypes, the value of the unit is equal to the estimated sale price. The sale prices for each prototype are established based on market research and conversations with local developers. Current sales prices for newly constructed condominium units, estimated by Redfin, are reported to be $402,831 per typically sized two-bedroom unit; single family small lot units are valued at $576,000 per 3-bedroom unit, and new single family detached homes are selling for approximately $792,000 per 4-bedroom unit. **Table 5** shows the market values used in the feasibility analysis for each product type.

Table 5 City of Vallejo Residential Market Values

	Sale Price			Capitalized Market Value and Monthly Rent	
	Single Family Detached	Small Lot Single Family Detached	Multifamily Attached Condo	Baseline Density Multifamily Apartment	Higher Density Multifamily Apartment
Market Value	$792,000	$576,000	$402,831	$452,436	$452,436
Monthly Rent	-	-	-	$2,907	$2,907

Source: CoStar; Redfin, Economic & Planning Systems.

Affordable Housing Values

Inclusionary housing programs typically aim to supply housing affordable to the Very Low-, Low-, and Moderate-income categories. In general, Very Low-income households are defined as those earning up to 50 percent of AMI. Low-income households earn up to 80 percent AMI and Moderate-income households earn up to 120 percent of AMI, adjusted for household size.

Based on the household income limit at each income level, as defined by the State for all jurisdictions in Solano County, EPS calculated the maximum spending towards housing costs affordable at each income level. The analysis assumes that households spend 30 percent of their gross annual income on total housing costs. For rental units, housing costs include rent and utilities. EPS estimates NOI per unit by subtracting operating expenses and utilities from housing payments, then calculates unit values based on the assumption that the NOI represents 5.5 percent of the total unit value.

For for-sale units, housing costs include mortgage and interest payments, insurance, property taxes, and Homeowners' Association (HOA) dues. To calculate the maximum affordable sale price for these for-sale units, EPS estimated these housing costs and subtracted it from 30 percent of gross annual income to obtain the maximum income available for a mortgage payment. This mortgage payment was converted into an affordable home sale price assuming a 5 percent down payment and a 30-year mortgage with a fixed interest rate of 5 percent.

Table 6 indicates the maximum annual incomes for County households associated with each income category for the assumed household size, as well as the supportable rental unit values and for-sale prices associated with each income category.

Table 6 Affordable Unit Values

Item	Very Low Income	Low Income	Moderate Income
Single Family Detached (For Sale)			
Maximum Household Income[1]	$74,200	$118,700	$161,450
Supportable Home Price	$156,500	$319,500	$476,100
Small Lot Single Family Detached (For Sale)			
Maximum Household Income[1]	$68,700	$109,900	$149,500
Supportable Home Price	$148,500	$312,500	$444,500
Multifamily Condominiums (For Sale)			
Maximum Household Income[1]	$61,850	$98,950	$134,550
Supportable Home Price	$131,900	$267,100	$398,300
Baseline Density Multifamily Apartments (Rental)			
Maximum Household Income[1]	$61,850	$98,950	$134,550
Supportable Unit Value	$131,000	$160,673	$421,082
Higher Density Multifamily Apartments (Rental)			
Maximum Household Income[1]	$61,850	$98,950	$134,550
Supportable Unit Value	$131,000	$333,364	$482,091

[1] Reflects 2025 HCD Income Limits for a three-person household for apartments and condominiums, a four-person household for small lot single-family homes, and a five-person household for single-family detached homes.

Equivalent In-Lieu Fee Calculation

For an inclusionary program, the equivalent in-lieu fee is the level of fee that would be economically equivalent to the developer constructing the required affordable units on-site. At this fee level, there is no financial advantage to building inclusionary units versus paying in-lieu fees because both options represent the same level of subsidy that the developer has to provide.

To calculate this, EPS subtracted the supportable unit values that each income level can afford ("Value" in **Table 7**) from the unit's development cost ("Cost") to get the subsidy or equivalent in-lieu fee per affordable unit. What this indicates, for example, is that a developer that provides a prototypical single-family home (of four bedrooms) in Vallejo that is priced affordable for a Low Income household (of five persons) would effectively be subsidizing that unit at a cost of $471,614.

Alternatively, an in-lieu fee payment to the City of $471,614 for that unit would enable the developer to provide the unit as market-rate but still contribute an equivalent amount to the City's affordable housing resources.

Table 7 Subsidy per Affordable Unit

Subsidy or Equivalent In-Lieu Fee per Affordable Unit	Very Low Income (50% AMI)	Low Income (80% AMI)	Moderate Income (120% AMI)
Single Family Detached			
Cost	$791,114	$791,114	$791,114
Value	$156,500	$319,500	$476,100
Subsidy Gap	**$634,614**	**$471,614**	**$315,014**
Small Lot Single Family Detached			
Cost	$626,520	$626,520	$626,520
Value	$148,500	$312,500	$444,500
Subsidy Gap	**$478,020**	**$314,020**	**$182,020**
Mulitfamily Attached Condo			
Cost	$729,575	$729,575	$729,575
Value	$131,900	$267,100	$398,300
Subsidy Gap	**$597,675**	**$462,475**	**$331,275**
Baseline Density Multifamily Apartment			
Cost	$500,313	$500,313	$500,313
Value	$131,000	$333,364	$482,091
Subsidy Gap	**$369,313**	**$166,950**	**$18,222**
Higher Density Multifamily Apartment			
Cost	$529,887	$529,887	$529,887
Value	$131,000	$333,364	$482,091
Subsidy Gap	**$398,887**	**$196,523**	**$47,796**

Source: Economic & Planning Systems

4. Feasibility Analysis

Market-rate Development Feasibility

The first step in assessing feasible inclusionary housing requirements for Vallejo is to evaluate whether fully market-rate projects under defined product prototypes are financially feasible. EPS calculated the yield-on-cost or profit margin for each product prototype without inclusionary requirements, assuming the current market-rate prices and development costs described above in **Table 4** and **Table 5**. As shown in **Table 8**, only single-family detached homes appear to be marginally feasible under the current relationship of construction costs and market-rate sale prices. Other product types do not appear to reach their minimum return thresholds under present market conditions in Vallejo.

Table 8 Development Feasibility for Vallejo Housing Prototypes

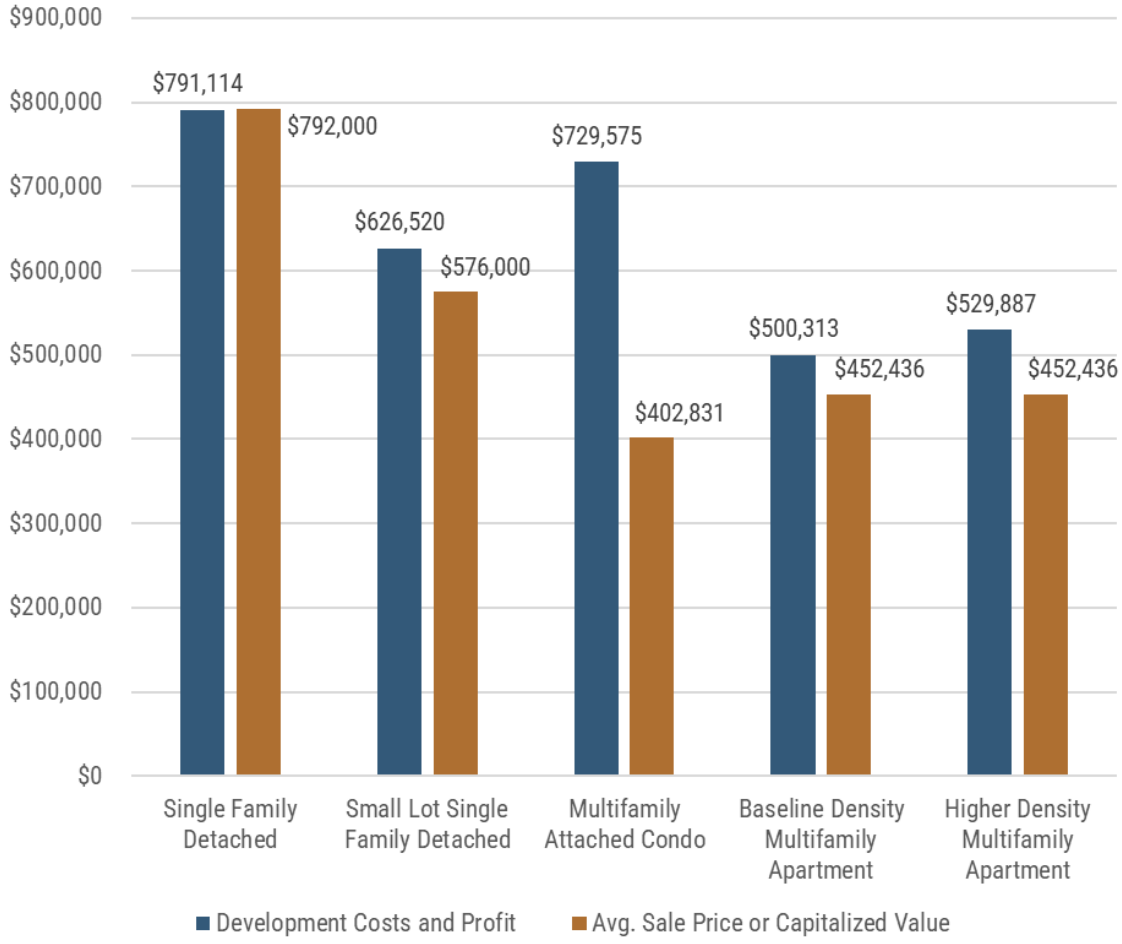
Item	Feasibility Threshold	Results
Single Family Detached		
Development Costs Per Unit		$687,925
Average Sale Price		$792,000
Profit		$104,075
Profit Margin	15%	15.13%
Small Lot Single Family Detached		
Development Costs Per Unit		$544,800
Average Sale Price		$576,000
Profit		$31,200
Profit Margin	15%	5.73%
Multifamily Attached Condo		
Development Costs Per Unit		$634,413
Average Sale Price		$402,831
Profit		($231,583)
Profit Margin	15%	-36.50%
Baseline Density Multifamily Apartment		
Development Costs Per Unit		$500,313
Net Operating Income Per Unit		$24,884
Yield on Cost	5.5%	4.97%
Higher Density Multifamily Apartment		
Development Costs Per Unit		$529,887
Net Operating Income Per Unit		$24,884
Yield on Cost	5.5%	4.70%

Source: Economic & Planning Systems

Single-family detached housing is only slightly feasible because the estimated average sale price of $792,000 represents a profit margin of 15.13 percent over development costs. Single-family small lot units do not reach the 15 percent threshold for feasibility. For condominiums, development costs exceed the sale value that could be received for the product type, so the profit margin is actually estimated to be negative. Rental apartments are challenged because rising construction costs and reduced market rents together demonstrate weak net operating income and therefore low yield-on-cost.

Another perspective of evaluating this is to compare the costs with minimum developer profit or yield-on-cost included to determine whether market values are in excess of that. **Figure 7** shows the prototypes comparing their development costs and profit with their sale price or capitalized value. Only single-family detached units have a sale price that exceeds the developer cost plus minimum profit level.

Figure 7 Development Costs and Profit vs. Market Value of Vallejo Housing Prototypes



Source: Economic & Planning Systems

It is important to note that this analysis only reflects an average prototypical project, and any specific project may have its own cost and revenue factors that may be impacted in part by its unit mix. There are many factors that can impact the financial feasibility of any particular development project. For example, if a project can acquire land at a lower price or provide less parking than what is represented in the above assumptions or identify lower-cost financing, the project economics may improve. Similarly, a developer may find that there is sufficient market demand to achieve rents or sale prices higher than those assumed in this analysis.

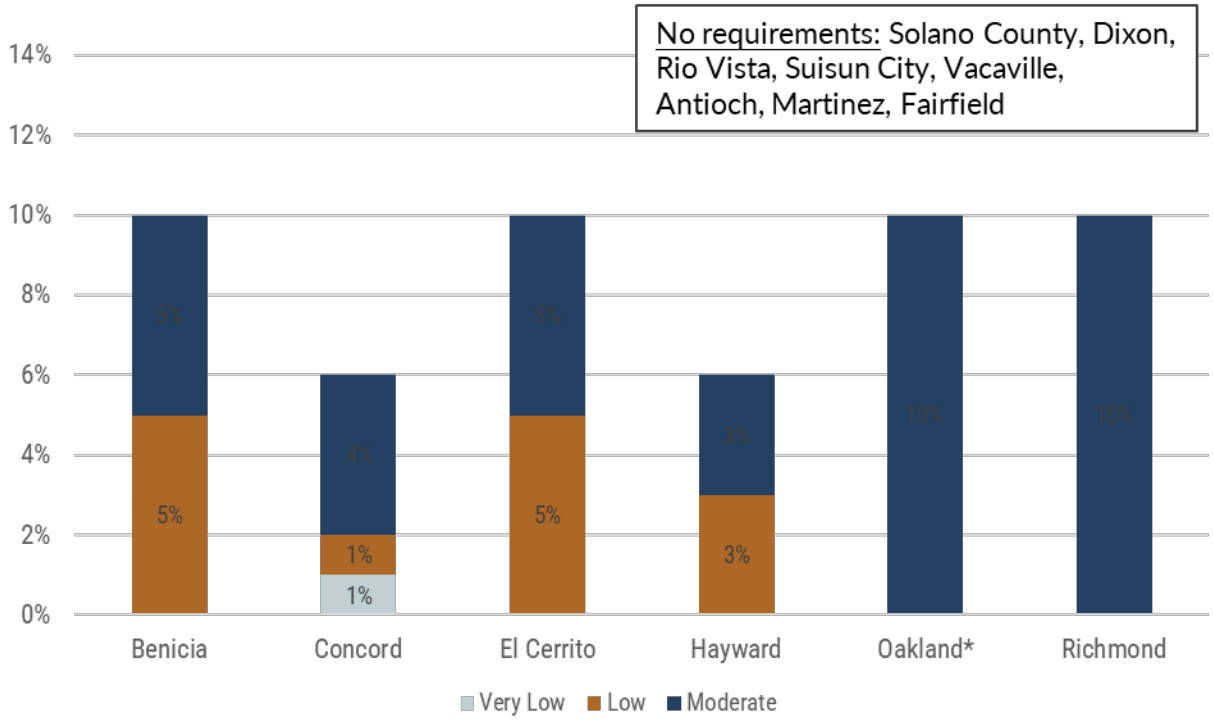
Inclusionary Requirements in Other Jurisdictions

Understanding how other local cities have adopted their inclusionary programs can help Vallejo select an inclusionary level or fees that keeps the housing market competitive with their peer jurisdictions.

EPS evaluated the inclusionary requirements for all cities in Solano County, and select other jurisdictions in Alameda County and Contra Costa County. Currently, Benicia is the only city in Solano County with a requirement, although others like Fairfield or Vacaville have also recently considered it. **Figure 8** shows several comparable cities' inclusionary requirements for rental projects, which range from 6 to 10 percent and primarily include Low Income and Moderate Income levels, although Concord also requires some Very Low Income units. **Figure 9** presents the requirements for for-sale units in the same cities. The for-sale programs target only Low Income and Moderate Income levels with requirements between 10 and 15 percent. For Very Low Income households, even with properties priced affordably, they are likely to face additional challenges towards homeownership such as securing mortgage financing or keeping up with maintenance costs and property taxes.

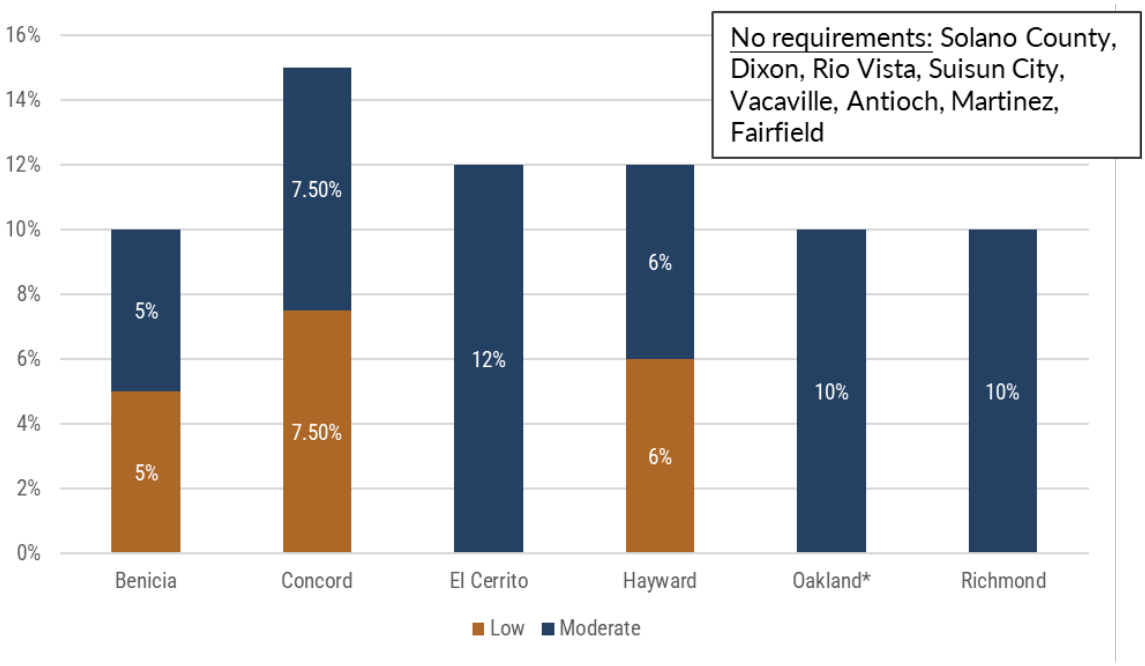
A detailed table comparing requirements and fees is included in **Appendix A.**

Figure 8 Rental Inclusionary Requirements in Peer Cities



**Oakland has affordable housing impact fee requirements and presents an on-site affordable housing option as alternative.*
Source: Economic & Planning Systems

Figure 9 For-Sale Inclusionary Requirements in Peer Cities



**Oakland has affordable housing impact fee requirements and presents an on-site affordable housing option as alternative.*
Source: Economic & Planning Systems

Equivalent In-Lieu Fees of Inclusionary Housing Options

At the November 24, 2025 study session with City Council, EPS and City staff received direction to proceed with identifying requirements and fees of a modest inclusionary program. Based on research into how peer cities have set their program requirements, staff developed three options to explore for rental and ownership each, presented below in **Table 9** and **Table 10**. From this, EPS calculated the equivalent in-lieu fees on each program option, using the subsidies per affordable unit previously calculated on **Table 7**.

Of the options presented for rental projects, the total inclusionary requirement ranges from 4 to 6 percent. For a rental project, an in-lieu fee is equivalent to roughly $10,000 to $16,000 per market rate unit. For a for-sale product, the options vary by the total project size, with smaller projects below 100 units receiving a reduced requirement and lower in-lieu fees as a result.

Table 9 Rental Inclusionary Program Options and Calculated In-Lieu Fees

Product Type	Inclusionary Option A	Inclusionary Option B	Inclusionary Option C
Inclusionary Requirement for Rental (20+ units)			
Very Low Income	1%	2%	2%
Low Income	4%	2%	4%
Moderate Income	0%	0%	0%
Total	5%	4%	6%
In-Lieu Fee (Subsidy) for 100 Unit Project			
Lower Density Multifamily Apartment - Total	$1,037,112	$1,072,526	$1,406,425
per Affordable Unit	$207,422	$268,132	$234,404
per Market Rate Unit	$10,371	$10,725	$14,064
per Market Rate Square Foot	$8.64	$8.94	$11.72
Higher Density Multifamily Apartment - Total	$1,184,980	$1,190,820	$1,583,867
per Affordable Unit	$236,996	$297,705	$263,978
per Market Rate Unit	$11,850	$11,908	$15,839
per Market Rate Square Foot	$9.87	$9.92	$13.20

Source: Economic & Planning Systems

Table 10 For-Sale Inclusionary Program Options and Calculated In-Lieu Fees

Product Type	Inclusionary Option A	Inclusionary Option B	Inclusionary Option C
Inclusionary Requirement for For Sale (20 to 99 units)			
Very Low Income	0%	0%	0%
Low Income	3%	4%	5%
Moderate Income	2%	3%	5%
Total	5%	7%	10%
In-Lieu Fee (Subsidy) for 50 Unit Project			
Single Family Detached (20-99 units)	$1,022,434	$1,415,748	$1,966,569
per Affordable Unit	$408,974	$404,499	$393,314
per Market Rate Unit	$20,449	$28,315	$39,331
per Market Rate Square Foot	$9.29	$12.87	$17.88
Single Family Small Lot Detached (20-99 units)	$653,050	$901,070	$1,240,100
per Affordable Unit	$261,220	$257,449	$248,020
per Market Rate Unit	$13,061	$18,021	$24,802
per Market Rate Square Foot	$8.16	$11.26	$15.50
Multifamily Condominium (20-99 units)	$1,024,988	$1,421,864	$1,984,377
per Affordable Unit	$409,995	$406,247	$396,875
per Market Rate Unit	$20,500	$28,437	$39,688
per Market Rate Square Foot	$17.08	$23.70	$33.07
Inclusionary Requirement for For Sale (100+ units)			
Very Low Income	0%	0%	0%
Low Income	5%	6%	7.5%
Moderate Income	3%	4%	7.5%
Total	8%	10%	15%
In-Lieu Fee (Subsidy) for 100 Unit Project			
Single Family Detached (100+ units)	$3,303,110	$4,089,738	$5,899,706
per Affordable Unit	$412,889	$408,974	$393,314
per Market Rate Unit	$33,031	$40,897	$58,997
per Market Rate Square Foot	$15.01	$18.59	$26.82
Single Family Small Lot Detached (100+ units)	$2,116,160	$2,612,200	$3,720,300
per Affordable Unit	$264,520	$261,220	$248,020
per Market Rate Unit	$21,162	$26,122	$37,203
per Market Rate Square Foot	$13.23	$16.33	$23.25
Multifamily Condominium (100+ units)	$3,306,203	$4,099,953	$5,953,130
per Affordable Unit	$413,275	$409,995	$396,875
per Market Rate Unit	$33,062	$41,000	$59,531
per Market Rate Square Foot	$27.55	$34.17	$49.61

Source: Economics & Planning Systems, Inc.

Alternatives to Compliance or Implementation

The feasibility results suggest that under current market conditions, it may be challenging to implement any of the inclusionary options as mandatory requirements. However, there are alternatives to compliance or options for implementation that may be considered in response to housing production challenges in the market. The options discussed in this section have been included in various inclusionary policies in local jurisdictions and other locations across California.

Most inclusionary zoning policies include some exemptions or alternatives to compliance that are typically written into the adopted ordinance. For example, certain situations or types of development, such as ADUs or reconstruction after natural disasters, are commonly exempted from inclusionary requirements. In addition to allowing the payment of in-lieu fees, the ordinance may identify other alternatives for complying with local regulations, such as off-site construction of affordable housing, offering affordable rental units within a for-sale development, or dedication of land for affordable housing.

Jurisdictions can also adopt options relating to the implementation of the inclusionary policy. For example, phasing in requirements or fees over a period of time may allow developers time to prepare for upcoming changes. Setting market-based triggers (e.g., aggregate number of units entitled) to initiate an inclusionary policy bases its implementation on unbiased data showing improved market conditions. Such triggers may mitigate concerns that an inclusionary policy would be too restrictive on current housing production.

Cities may also reduce the in-lieu fee below the economically equivalent amount, which would incentivize payment of fees over providing inclusionary units but would generate affordable housing fund revenue for the City with which they may pursue a more flexible range of housing programs and projects. They may also vary requirements by geography within the City or by building type to encourage specific development areas or types.

All of these options represent policy decisions made based on a number of factors, including current development pipeline, stakeholder feedback or public receptiveness, and the goals of other housing programs in the city.

Appendices

Appendix A: Survey of Inclusionary Requirements in Select Jurisdictions

Table A-1 Ownership Inclusionary Requirements as of January 2024

County	Jurisdiction	Overall Inclusionary Requirement	Income Targets	Project Size Threshold	In-Lieu Fee	Last Ordinance Update
Solano County	**Vallejo**			***no inclusionary requirement***		
	Solano County			*no inclusionary requirement*		
	Benicia[1]	10-15%	1/2 Moderate 1/2 Low	10 units	calculated by formula	2023
	Dixon			*no inclusionary requirement*		
	Fairfield			*no inclusionary requirement*		
	Rio Vista			*no inclusionary requirement*		
	Suisun City			*no inclusionary requirement*		
	Vacaville			*no inclusionary requirement*		
Contra Costa County	Antioch			*no inclusionary requirement*		
	Concord[2]	15%	1/2 Moderate 1/2 Low	5 units	$20 per sq. ft.	2022
	El Cerrito[3]	12%	Moderate	9 units	$24 per sq. ft.	2018
	Martinez			*no inclusionary requirement*		
	Richmond[4]	10% 7%	Moderate; OR Low	10 units	$0-12 per sq. ft.	2020
Alameda County	Oakland[5]	10% 10% 5%	Moderate; OR Low; OR Very Low	all	$10,785-$31,006 per unit.	2016
	Hayward[6]	12%	1/2 Moderate 1/2 Low	2 units	$19.22-$25.97 per sq. ft. habitable space	2023

[1] In Benicia, developments of less than 100 units have a requirement of 10% while developments of 100 units or more have a requirement of 15%.

[2] In Concord, the in-lieu fee option applies to Ownership projects 5 to 9 units; projects 10 units or greater must build. Fractional units pay $254,838 x fractional unit amount.

[3] El Cerrito only allows in-lieu fees to be paid on fractional inclusionary units below 0.5; must-build requirement applies otherwise.

[4] Fee varies by project size and geographic location within Richmond

[5] Oakland has affordable housing impact fee requirements and presents an on-site affordable housing option as alternative. Fee varies depending on the zone of construction and the housing type.

[6] Hayward has 7.5% Moderate requirement for condominiums greater than 35 DU/ac. Fee varies depending on housing type and density level.

Table A-2 Rental Inclusionary Requirements as of January 2024

City		Overall Inclusionary Requirement	Income Targets	Project Size Threshold	In-Lieu Fee	Last Ordinance Update
Solano County	**Vallejo**			***no inclusionary requirement***		
	Solano County			*no inclusionary requirement*		
	Benicia	10-15%	5% Moderate 5% Low	10 units	calculated by formula	2023
	Dixon			*no inclusionary requirement*		
	Fairfield			*no inclusionary requirement*		
	Rio Vista			*no inclusionary requirement*		
	Suisun City			*no inclusionary requirement*		
	Vacaville			*no inclusionary requirement*		
Contra Costa County	Antioch			*no inclusionary requirement*		
	Concord	6%	4% Moderate 1% Low 1% Very Low	5 units	$15 per sq. ft.	2024
	El Cerrito[1]	10%	5% Moderate 5% Low	10 units	$19 per sq. ft.	2018
	Martinez			*no inclusionary requirement*		
	Richmond[2]	10% 9%	Moderate; OR Low	10 units	$0-12 per sq. ft.	2020
Alameda County	Oakland[3]	10% 10% 5%	Moderate; OR Low; OR Very Low	all	$9,692-$27,684 per unit.	2016
	Hayward	6%	1/2 Low 1/2 Very Low		$23.44 per sq. ft. habitable space	

[1] El Cerrito only allows in-lieu fees to be paid on fractional inclusionary units below 0.5; must-build requirement applies otherwise.

[2] Fee varies by project size and geographic location within Richmond

[3] Oakland has affordable housing impact fee requirements and presents an on-site affordable housing option as alternative. Fee varies depending on the zone of construction and the housing type.

Appendix B: Detailed Development Costs of Product Prototypes

Table B-1 Development Costs for Single Family Detached

Item	Single Family Detached Assumptions		Per Unit
Development Prototype			
Tenure	Ownership		
Parcel Size	1	acre	
Density	8	units/acre	
Unit Size (gross)	2,200	sq.ft.	
Unit Size (net)	2,200	sq.ft.	
Number of Bedrooms	4	per unit	
Parking	2	spaces per unit	
Development Costs			
Land Costs	$1,200,000	per acre	$150,000
Site Preparation	$25	per sq.ft. of land	$136,125
Subtotal, Land			*$286,125*
Direct Construction Costs	$120	per sq.ft.	$264,000
Parking Costs	$0	per space	$0
Subtotal, Direct Costs			*$264,000*
Development Impact Fees [1]	$70,000	per unit	$70,000
Planning and Building Fees	$15,000	per unit	$15,000
Indirect Costs [2]	20%	of direct costs	$52,800
Subtotal, Indirect Costs			*$137,800*
% of direct costs			52%
Total Construction Costs			**$687,925**
per square foot			$313
Developer Profit Threshold	15%	of total construction costs	$103,189
Total Development Costs			**$791,114**
per square foot			$360

Sources: Costar; Marshall & Swift; EPS discussions with local active developers

Table B-2 Development Costs for Single Family Small Lot Detached

Item	Small Lot Single Family Detached Assumptions		Per Unit
Development Prototype			
Tenure	Ownership		
Parcel Size	1	acre	
Density	15	units/acre	
Unit Size (gross)	1,600	sq.ft.	
Unit Size (net)	1,600	sq.ft.	
Number of Bedrooms	3	per unit	
Parking	2	spaces per unit	
Development Costs			
Land Costs	$1,200,000	per acre	$80,000
Site Preparation	$25	per sq.ft. of land	$72,600
Subtotal, Land			*$152,600*
Direct Construction Costs	$160	per sq.ft.	$256,000
Parking Costs	$0	per space	$0
Subtotal, Direct Costs			*$256,000*
Development Impact Fees [1]	$70,000	per unit	$70,000
Planning and Building Fees	$15,000	per unit	$15,000
Indirect Costs [2]	20%	of direct costs	$51,200
Subtotal, Indirect Costs			*$136,200*
% of direct costs			53%
Total Construction Costs			**$544,800**
per square foot			$341
Developer Profit Threshold	15%	of total construction costs	$81,720
Total Development Costs			**$626,520**
per square foot			$392

Sources: Costar; Marshall & Swift; EPS discussions with local active developers

Table B-3 Development Costs for Multifamily Attached Condominium

Item	Multifamily Attached Condo Assumptions		Per Unit
Development Prototype			
Tenure	Ownership		
Parcel Size	1	acre	
Density	30	units/acre	
Unit Size (gross)	1,500	sq.ft.	
Unit Size (net)	1,200	sq.ft.	
Number of Bedrooms	2	per unit	
Parking	1.5	spaces per unit	
Development Costs			
Land Costs	$1,000,000	per acre	$33,333
Site Preparation	$15	per sq.ft. of land	$21,780
Subtotal, Land			*$55,113*
Direct Construction Costs	$255	per sq.ft.	$382,500
Parking Costs	$33,500	per space, podium-style	$50,250
Subtotal, Direct Costs			*$432,750*
Development Impact Fees [1]	$48,000	per unit	$48,000
Planning and Building Fees	$12,000	per unit	$12,000
Indirect Costs [2]	20%	of direct costs	$86,550
Subtotal, Indirect Costs			*$146,550*
% of direct costs			34%
Total Construction Costs			**$634,413**
per square foot			$423
Developer Profit Threshold	15%	of total construction costs	$95,162
Total Development Costs			**$729,575**
per square foot			$486

Sources: Costar; Marshall & Swift; EPS discussions with local active developers

Table B-4 Development Costs for Baseline Density Multifamily Apartment

Item	Baseline Density Multifamily Apartment Assumptions		Per Unit
Development Prototype			
Tenure	Rental		
Parcel Size	1	acre	
Density	30	units/acre	
Unit Size (gross)	1,200	sq.ft.	
Unit Size (net)	950	sq.ft.	
Number of Bedrooms	2	per unit	
Parking	1.5	spaces per unit	
Development Costs			
Land Costs	$1,000,000	per acre	$33,333
Site Preparation	$15	per sq.ft. of land	$21,780
Subtotal, Land			*$55,113*
Direct Construction Costs	$255	per sq.ft.	$306,000
Parking Costs	$10,000	per space, surface parking	$15,000
Subtotal, Direct Costs			*$321,000*
Development Impact Fees [1]	$48,000	per unit	$48,000
Planning and Building Fees	$12,000	per unit	$12,000
Indirect Costs [2]	20%	of direct costs	$64,200
Subtotal, Indirect Costs			*$124,200*
% of direct costs			39%
Total Construction Costs			**$500,313**
per square foot			$417

Sources: Costar; Marshall & Swift; EPS discussions with local active developers

Table B-5 Development Costs for Higher Density Multifamily Apartment

Item	Higher Density Multifamily Apartment Assumptions		Per Unit
Development Prototype			
Tenure	Rental		
Parcel Size	1	acre	
Density	65	units/acre	
Unit Size (gross)	1,200	sq.ft.	
Unit Size (net)	950	sq.ft.	
Number of Bedrooms	2	per unit	
Parking	1.5	spaces per unit	
Development Costs			
Land Costs	$1,000,000	per acre	$15,385
Site Preparation	$15	per sq.ft. of land	$10,052
Subtotal, Land			*$25,437*
Direct Construction Costs	$275	per sq.ft.	$330,000
Parking Costs	$33,500	per space, podium-style	$50,250
Subtotal, Direct Costs			*$380,250*
Development Impact Fees [1]	$48,000	per unit	$48,000
Planning and Building Fees	$12,000	per unit	$12,000
Indirect Costs [2]	20%	of direct costs	$64,200
Subtotal, Indirect Costs			*$124,200*
% of direct costs			33%
Total Construction Costs			**$529,887**
per square foot			$442

Sources: Costar; Marshall & Swift; EPS discussions with local active developers

From: Ramon Rovirosa
To: Hector Rojas
Subject: Concern About Proposed Affordable Housing Fees
Date: Thursday, May 7, 2026 9:43:27 AM

Dear Mayor, City Councilmembers, and City Staff,

I am a Vallejo resident living in Glen Cove, and I am writing to share my concern about the proposed affordable housing requirements and in-lieu fees for new residential development.

At a high level, I believe Vallejo should be doing everything it can to attract more housing development, not create additional costs that may discourage builders from investing here.

One of Vallejo's biggest advantages is that it remains one of the more relatively affordable places to live in the Bay Area. In March 2026, Redfin reported Vallejo's median home sale price at about $513,500, compared with about $785,000 in Contra Costa County, about $1.49 million in San Jose, and about $1.69 million in San Francisco. Zillow's March 2026 home-value data tells a similar story: Vallejo's average home value was about $520,970, compared with about $789,908 in Contra Costa County, about $1.46 million in San Jose, and about $1.36 million in San Francisco.

That relative affordability is an asset. Vallejo has the opportunity to attract families, workers, first-time homebuyers, and investment that might be priced out of San Francisco, San Jose, and much of Contra Costa County. But to take advantage of that opportunity, we need policies that make Vallejo easier and more attractive to build in — not policies that add uncertainty, fees, or financial barriers to new housing projects.

The new Costco/Fairview at Northgate project is a good example of the type of development Vallejo should want more of. It is bringing a relocated and expanded Costco, additional retail, open space, and new housing to a long-vacant site. The City's project page describes it as including new residential, open space, and commercial development, and recent reporting noted that the Planning Commission approved increasing the housing component from 178 homes to 245 homes. That is exactly the kind of mixed-use investment Vallejo needs: new homes, new retail activity, new tax revenue, and productive use of vacant land.

My concern is that a project like Costco/Fairview may have been much harder to make financially feasible if it had faced additional affordable housing mandates or in-lieu fees from the beginning. We should be asking whether similar projects in the future would still choose Vallejo if the City adds more costs, more uncertainty, and more requirements. Vallejo cannot afford to scare away the very projects that bring housing, jobs, retail activity, and long-term revenue to the City.

Vallejo is already struggling to get enough housing built. According to recent reporting on Vallejo's Housing Element progress, the City had only credited 193 homes toward its obligation to create 2,900 affordable homes, or about 6.65% of the eight-year goal. The same report noted that 26 housing development applications were submitted in 2025, proposing 625 homes, which suggests there is interest in building here — but we should be careful not to

make those projects harder to finance or complete.

I was especially concerned to read that the City's own inclusionary housing analysis reportedly found that many Vallejo projects are "not financially feasible" under current market conditions, and that adding mandatory on-site affordability requirements could further reduce feasibility and potentially discourage new housing production. That is exactly the risk I am worried about: a well-intentioned policy that results in fewer projects, fewer homes, and less overall investment in Vallejo.

Vallejo also already has a substantial amount of subsidized and income-restricted housing infrastructure compared with many nearby communities. The Vallejo Housing Authority administers the Housing Choice Voucher / Section 8 program, and its own public housing authority plan listed 2,267 Housing Choice Vouchers. By comparison, public housing data directories list Benicia at 376 vouchers, Fairfield at 894 vouchers, and Vacaville at 1,239 vouchers. The City's own website also lists multiple affordable or subsidized rental properties in Vallejo, including Ascension Arms, Bay View Vista, Casa de Vallejo, Marina Tower, Redwood Shores, Seabreeze Apartments, and Sereno Village Apartments.

I support affordable housing and believe Vallejo should remain an inclusive city. But given Vallejo's existing affordable housing and voucher infrastructure, I think the City should carefully compare our current affordable housing burden and voucher presence with nearby cities like Benicia, Fairfield, Vacaville, and American Canyon before adding new burdens to future development. Vallejo should not be the city that both carries a large share of the region's subsidized housing responsibility and makes new market-rate or mixed-income housing harder to build.

In my view, the best path forward is to make Vallejo a place where builders want to build. More overall housing supply can help ease pressure on rents and home prices, while also bringing new residents, jobs, customers for local businesses, and long-term revenue to support City services. The fact that 57% of Vallejo renters are rent-burdened shows how serious the housing affordability problem is, but it also shows why we need more total housing production, not policies that might slow it down.

I respectfully urge the City to be cautious about adopting additional fees or mandates that could make housing projects less feasible. Before moving forward, I would like to see the City clearly analyze whether the proposed fees and requirements will reduce the number of projects that can realistically be built in Vallejo. I would also encourage the City to focus on streamlining approvals, reducing uncertainty, encouraging infill development, and making it easier to build well-designed housing across income levels.

Vallejo has a real opportunity to grow in a positive way, but we need policies that entice development rather than push it away.

Thank you for your time and for considering the perspective of a Glen Cove resident.

Sincerely,
Ramon
Glen Cove resident, Vallejo

From: herbert starks
To: Hector Rojas
Subject: Concerns related to MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING REQUIREMENTS
Date: Thursday, May 7, 2026 6:25:14 AM

Please share as appropriate:

Regarding:
Concerns related to; MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING REQUIREMENTS

As a long time Vallejo resident my concerns are as follows:

Vallejo does not currently have development momentum to impose stronger requirements without discouraging investment.

Housing alone does not create vibrancy therefore improving public safety, partnering with schools, cleaning up business and retail corridors would help improve developer interest before imposing regulation.

Short and intentional. Thank you for your time.

Sincerely,
Herb Starks

From: Kent Mecham
To: Hector Rojas
Subject: Crime
Date: Thursday, May 7, 2026 10:56:10 AM

This Message Is From an External Sender
This message came from outside your organization.

There is enough crime in Vallejo, we don't need more low housing that draws in crime., A big no on my vote
Sent from my iPhone

From: Jocelyn Sevilla
To: Hector Rojas
Subject: Housing concerns
Date: Saturday, May 9, 2026 1:53:44 AM
Attachments: IMG_0611.jpeg

Dear Mayor and City Council Members,

I am writing to express my concern regarding the potential implementation of mandatory low-income unit requirements for new developments in Vallejo. While the goal of providing affordable housing is noble, the current economic climate in our city requires a more nuanced approach to ensure Vallejo can truly thrive.

Mandatory inclusionary requirements often serve as a deterrent to the very private investment we need. In a market like Vallejo's, where construction costs often outpace potential returns, adding a mandatory "below-market" requirement can make a project financially unfeasible. When a project doesn't "pencil out," it doesn't get built. This leaves the city with zero new units—market-rate or otherwise.

Furthermore, investors have a wide range of choices in Northern California. If Vallejo's regulatory environment is perceived as more burdensome than neighboring jurisdictions, we will see a flight of capital to cities with more predictable and flexible development rules.

I urge the Council to consider incentive-based programs—such as density bonuses, fee waivers, or expedited permitting—rather than strict mandates. This allows the market to drive growth while giving developers a reason to invest in our community. Let's focus on policies that encourage a high volume of all housing types, which will ultimately create the tax base and foot traffic necessary for Vallejo to flourish.

P.S the email listen on the email blast is incorrect it was missing the first name please see attached image, thank you.

Sincerely,

Jocelyn Sevilla

May 12, 2026

To: Mr. Hector Rojas
Long-Range Planning Manager
City of Vallejo Planning Division
555 Santa Clara Street
Vallejo, CA 94590-5922

Fm: John DeBord
[redacted]

RE: Comments on Vallejo's Draft Inclusionary Housing Ordinance

First and foremost, proof as to whether the Inclusionary Housing Ordinance is viable will be the construction, or lack of construction, of inclusionary housing. Hence, I believe that the Ordinance should include requirements to report, annually, on the number of units constructed under terms of the Ordinance. If nothing is constructed, then the Ordinance is obviously too restrictive – i.e., housing cannot be profitably built or operated (e.g., as a non-profit) under terms of the Ordinance.

I sum, without a reporting requirement, the public, who will supposedly be served, won't know how successful, or unsuccessful, the Ordinance is. More specifically, I believe the public needs to be made aware of any in-lieu fees paid by developers who want to construct housing exclusive of contiguous affordable units. And subsequently, what housing the City provides with in-lieu funds received.

To my way of thinking, the allowance to permit construction of affordable units *not* contiguous to a residential project, figuratively equates to (a term I hesitate to use) "redlining" – i.e., the developer does not want lower income individuals sprinkled in amongst those better off. Hence, he/she remits in-lieu of fees. Then again, the object of the Ordinance is to increase the availability of affordable housing (inclusive or exclusive), which it (hopefully) accomplishes. Relegating affordable housing to a non-contiguous area does not necessarily lift all boats equally, which I believe is in everyone's best interest.

What concerns me most is management within a development, particularly that of either owned or rented affordable housing. I have seen public housing projects fail for lack of maintenance or adequate management of the properties. The most successful

developments, owned or rented, seem to be those where the residents and management work cooperatively to ensure that all units are properly maintained and that any problems related to drugs, alcohol, prostitution, break-ins, etc. be quickly addressed. It accomplishes little if affordable units end up in environments where rules are not adequately enforced. This is one reason I don't favor off-site construction of affordable housing units. Pride of ownership generally rubs off on those less privileged.

I question why the Ordinance takes effect 180 days after its final passage? Why not much sooner? A nervous developer may want to get under the wire before the Ordinance takes effect. Thereafter, developers may be more hesitant to enter into any developments given terms of the Ordinance. If the objective is to increase the supply of affordable units, why not try to reach that goal as soon as possible?

As a whole, I applaud the terms of the Ordinance. However, given today's cost of land, materials, labor, increase in demand for water and power, I question if any housing built today can be considered "affordable" even with a median income. Once the Ordinance takes effect, I look forward to knowing the number of units built under its terms.

Respectfully yours,

John DeBord

From: Kristin Pollot
To: Dawn Abrahamson
Cc: Gillian Haen; Nalungo Conley; Veronica Nebb; Alicia Jones; Hector Rojas
Subject: RE: Public Comment: Affordable Housing Requirements Chapter 16.xxx
Date: Tuesday, May 12, 2026 10:53:35 AM
Attachments: image007.png
image008.png
image009.png
image011.png
image012.png
image013.png
image014.png
image015.png
image016.png
image017.png

Thanks Dawn – This looks like it is actually a comment on the proposed draft Inclusionary Housing Ordinance, so I'm including Hector as he is managing the project.

Thanks,

Kristin Pollot, AICP
Planning and Development Services Director
City of Vallejo | Planning and Development Services Department
555 Santa Clara Street Vallejo, CA 94590
Direct: (707) 648-4382 | Kristin.Pollot@cityofvallejo.net

***City Hall and the Central Permit Center are open from 9 a.m. to 3 p.m. Mondays through Thursdays.

From: Dawn Abrahamson <Dawn.Abrahamson@cityofvallejo.net>
Sent: Tuesday, May 12, 2026 10:50 AM
To: Dawn Abrahamson <Dawn.Abrahamson@cityofvallejo.net>
Cc: Gillian Haen <Gillian.Haen@cityofvallejo.net>; Nalungo Conley <Nalungo.Conley@cityofvallejo.net>; Veronica Nebb <Veronica.Nebb@cityofvallejo.net>; Kristin Pollot <Kristin.Pollot@cityofvallejo.net>; Alicia Jones <Alicia.Jones@cityofvallejo.net>
Subject: FW: Public Comment: Affordable Housing Requirements Chapter 16.xxx

Good Morning Mayor & Councilmembers (bcc'd),

Forwarding the email below to each of you.

Dawn G. Abrahamson, MMC
City Clerk
City of Vallejo | City Clerk's Office
Office: (707) 648-4528| dawn.abrahamson@cityofvallejo.net
Cell: (707) 334-2931

IIMC President 2025-2026
International Institute of Municipal Clerks https://www.iimc.com/

From: David Shipley [redacted]
Sent: Tuesday, May 12, 2026 10:47 AM
To: Dawn Abrahamson <Dawn.Abrahamson@cityofvallejo.net>
Subject: Public Comment: Affordable Housing Requirements Chapter 16.xxx

This Message Is From an External Sender
This message came from outside your organization.

Public Comment:
Proposed city ordinance related to Affordable Housing Requirements CHAPTER 16.XXX

In my opinion, this proposal will not only fail to generate new affordable housing, it will act as a brake on any future housing proposals at any income level.

I interpret the proposal as an attempt to achieve city housing goals by:

A. Increasing production of affordable units (by adding to the burden of developers and adding costs directly to the, I guess, non-affordable units)
B. Generating funds for development of affordable units (by paying unspecified "in lieu fees" before permitting starts, with no guarantee that permits will be timely or even approved)
C. Providing "alternatives", (ADU style offsite construction or rentals)
D. Restricting resales, keeping resale price lower than current dollar maintenance costs. (Putting deed restriction language on the developer and some odd post construction monitoring for ongoing eligibility and marketing plan to target audience?)
E. Allowing a maximum size of 1400sf
F. Requiring owner/renter occupancy
G. Requiring developer to pay city costs for administration

Rebuttal:

1. Outside developers, need to buy, build, sell and get out. They can't be burdened with ongoing administration. That is a fail
2. Outside developers do not remain in Vallejo is also a fail. We should encourage development by individual single property owners. They build over a longer period, using local design, labor and materials, which builds business and wealth IN Vallejo, not exporting dollars made from our resources
3. Ongoing developer costs for city administration is a non-starter for any developer
4. Transparency of any fee structure is required for city costs and "in lieu" fees (which go to some unspecified development of affordable units)
5. The idea that the developer must pay for deed language is odd, but ongoing monitoring of eligibility and low income marketing is not a developer function, nor is paying for our housing department
6. In any development, affordable units are paid for by buyers / renters in the other units. There is no calculation of that burden on other residents or if there is a maximum burden
7. How will this proposal increase the number of lower income housing units when proposals at Blue Rock Springs, Mare Island, North Mare Island, etc sit fallow and public lands available are minimal?
8. How will this proposal increase the number of housed lower income applicants when it bifurcates responsibilities and adds complexity to the housing function of the city?

Reality Check: Section 8 vouchers are the only effective way to put lower income families in any development, even high end units, doing exactly the thing this proposal purports to do. Vouchers cost the city/state/federal government an amount equivalent to Social

Security, yes, I have a tenant paying more than I receive in Social Security. The only way to increase the availability of vouchers is with reducing overhead, simplifying the system
Reality Check: Take the old Post Office site, give it to a developer for free to build 40 units and it does not pencil out at today's cost (I checked with a developer I know. It would require viable retail tenants on ground level, something untenable today). Additional burden isn't going to get housing built
I have been told by other developers: Lennar, on Treasure Island, is building what is the lowest cost per foot development in the state at slightly more than $350/sf. That is the best case possible.
My experience with rentals: The rule of thumb for rentals is $1000/month/$100,000 in current value. Not purchase price, maintenance is always in current dollars. HOA's provide a simple gauge of exterior maintenance set asides where I pay as much as $1000/month in this area. With each tenant change or say ten years, an internal refresh is needed. Two years ago that cost me $40,000 for flooring/paint in one unit and it is inflating annually. I don't expect that to change, which, when added to the current cheapest possible build price from Lennar, puts a rent floor to be in a viable business at over $3500/month. Any lower is not "affordable", it is a business failing and that means maintenance deferred.

I understand you have state mandates. Given that, this proposal is unclear, meaning developers will pass us by. It does nothing to address the reality that housing authorities place Section 8 voucher recipients from other areas into our housing spaces. It does nothing to encourage local development of housing and supportive business. It adds burdens that effectively wall off small developments generated by Vallejo residents for Vallejo residents. This is supposed to provide housing rather than reduce competition. When we see cities involved in reducing competition it is usually a symbiotic relationship, say utility fees, utility providers and not so neutral regulators. It appears here that the city benefits by passing on housing department costs, but it is worth a review because every outside developer given access to Vallejo land resources is exporting wealth away from our city.

Thanks for your time,
Dave Shipley

From: Dawn Abrahamson
To: Dawn Abrahamson
Cc: Gillian Haen; Kristin Pollot; Nalungo Conley; Veronica Nebb; Hector Rojas
Subject: FW: Addendum to Public Comment: Affordable Housing Requirement Chapter 16.xxx
Date: Tuesday, May 12, 2026 4:30:46 PM
Attachments: image001.png
image002.png
image003.png
image005.png
image006.png

Mayor & Councilmembers (bcc'd),

Forwarding the email below as an addendum to Mr. Shipley's email forwarded to you earlier this morning.

Dawn G. Abrahamson, MMC
City Clerk
City of Vallejo | City Clerk's Office
Office: (707) 648-4528 | *dawn.abrahamson@cityofvallejo.net*
Cell: (707) 334-2931

Spirit of the Bay

IIMC President 2025-2026
International Institute of Municipal Clerks https://www.iimc.com/

From: David Shipley [redacted]
Sent: Tuesday, May 12, 2026 4:16 PM
To: Dawn Abrahamson <Dawn.Abrahamson@cityofvallejo.net>
Subject: Addendum to Public Comment: Affordable Housing Requirement Chapter 16.xxx

Addendum to my public comment on Affordable Housing Requirement Chapter 16.xxx

I noticed that, like Section 8 vouchers, there is an attempt to push the by tenant variability of utility costs on to the seller / landlord. While this is perhaps the main culprit in the day to day pain of housing costs, it simply isn't possible to assign this to anyone but the user of utilities. PG&E alone has had 10% increases annually for at least the last 5 years. When twinned with variable usage, it is untenable as a business responsibility.

That said, there is more opportunity for public policy to impact the collection of utility costs impacting housing and affordability than in focusing on the housing itself. Many

of these costs have gone from single need pricing to segmented markets, whether its power, water, insurance or entertainment, all with the assistance of policy regulators and with benefit to the city budget. Even city run utilities are guilty. The water and sewerage/stormwater bill was segmented in the early 2000's here in Vallejo, doubling the ability to push out costs. Weaning the city budget from utility fees and taxes is a necessary step in promoting conservation of provided utility usage and creating programs that target reducing usage. These programs are needed in order to lower the cost of housing/living for Vallejo residents.

Thanks again for your consideration,
Dave Shipley

Solano - Napa Habitat for Humanity®

RECEIVED 5/28/26

May 21, 2026

Hector Rojas
Long Range Planning Manager
Planning & Development Services
555 Santa Clara Street
Vallejo, CA 94590

Dear Mr. Rojas,

Thank you for reaching out to Solano-Napa Habitat for Humanity (SNHFH) to review and submit any comments on the City's proposed Affordable Housing Requirements draft ordinance. SNHFH's Site Selection & Project Development Committee discussed the draft ordinance at our May 18, 2026, meeting. After reviewing the draft ordinance, we only have one suggested edit. In Section 16.XXX.05 Alternatives, we suggest adding a third alternative. "Partnering with an affordable housing developer for the construction of off-site affordable units or on-site inclusionary rental units".

Please feel free to contact me or our committee member Dave Dowswell, who can be reached at: cddjdowswell@juno.com.

Sincerely yours,

Andrew Killeen
Chief Executive Officer
Solano-Napa Habitat for Humanity

cc: Kristen Pollot, AICP, Planning and Development Services Manager
David Dowswell, Site Selection & Project Development Committee

May 26, 2026

City of Vallejo Planning Division
Attn: Hector Rojas, Long-Range Planning Manager
555 Santa Clara Street
Vallejo, CA 94590
hector.rojas@cityofvallejo.net

Dear Hector Rojas,

The undersigned organizations are writing to urge the City of Vallejo to strengthen the draft inclusionary ordinance by:

- Applying the ordinance to residential developments containing 10 or more units;
- Requiring that at least 20% of units in covered developments be affordable, including 15% affordable to low-income households and 5% affordable to very-low-income households;
- Establishing a meaningful in-lieu fee formula tied to the actual affordability gap and real cost of producing affordable housing;
- Prioritizing on-site affordable housing production as the preferred compliance pathway;
- Requiring that all in-lieu fees be deposited into a dedicated affordable housing fund used exclusively for affordable housing production, acquisition, rehabilitation, preservation, and tenant-stabilizing housing strategies;
- Establishing clear implementation, monitoring, enforcement, and annual reporting mechanisms

Lower-Income Residents of Vallejo are Facing a Housing Crisis

The City of Vallejo needs strong new policies to address the crisis of unaffordable housing that leads to cost burden, overcrowding, and displacement pressures faced by all residents, and especially residents of color; this set of policies must include a strong and meaningful inclusionary ordinance. The City of Vallejo has acknowledged that residents of color are overpaying for housing at higher rates than white residents.[1] The City faces one of the highest rates of overcrowding in Solano County, with 7% of residents overcrowded as compared to 5.3% of Solano County residents; residents of color in Vallejo face particularly severe overcrowding.[2] In the words of the City's Housing Element, "Overcrowding in households typically results from either a lack of affordable housing (which forces more than one household

[1] In its own summary of housing issues facing its residents, the City found that 42.2% of all households are overpaying, and that "[p]roportionally, White Non-Hispanic/Latinx and Asian residents overpaying for housing are fairly comparable at approximately 35.0 percent of each population, while Hispanic and Latinx residents experience a higher rate of overpayment (42.0 percent), and Other and Multiple Race residents (45.0 percent). Black and African American residents exhibit the highest rate of overpayment, at 54.0 percent." *City of Vallejo 2023-2031 Housing Element* [*Housing Element*] *Appendix 3* at 95].
[2] 8% of Asian residents, 5.3% of Black residents, 15.6% of Hispanic residents, and 17.6% of "Other Race or Multiple Race" residents (self-identified) overcrowded, as compared with 2.2% of "White, Non-Hispanic" and 4.1% of "White" (which may include Hispanic) (self-identified). Housing Element Appendix 2 at 2-22.

to live together) and/or a lack of available housing units of adequate size. Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure."[3]

These issues are particularly acute for lower-income households. The Housing Element notes that "In many circumstances, overpayment is closely tied to income and lower-income households are most at risk of displacement due to overpayment... Many lower-income households do not have access to affordable large units to accommodate larger families, thus resulting in overcrowding and subject to overpayment leading to potential displacement."[4] Some displaced individuals and families add to Vallejo's growing unhoused population, the largest in Solano County. Unhoused individuals are more likely to become ill and suffer violence and even death. Vallejo will not be able to meaningfully address homelessness–nor the social and environmental impacts of homelessness–unless it increases stock of deed-restricted affordable housing In addition to creating more stability, inclusionary ordinances promote the integration of affordable units in higher-cost, higher-opportunity neighborhoods. The need for increased housing stability and affordability is urgent, and requires a multi-pronged approach; increasing the stock of housing units affordable to lower-income households is an essential piece of this multi-pronged approach, and will be most realistically achieved through a strong inclusionary ordinance with a meaningful in-lieu fee that directly funds affordable housing.

The City Must Expand the Coverage of its Ordinance, and the Rates of Affordable Development

While we are pleased to see the City moving towards adopting an inclusionary ordinance, the draft falls short of what Vallejo residents need. We urge you to strengthen it before passage so that it more effectively meets the needs of the residents of Vallejo. In particular, we recommend the following:

- Apply the policy to developments with 10 units or more units, which is standard practice.[5] Limiting application to developments with 20 units or more would mean that a substantial amount of new development would include no affordable homes. Reducing the threshold to 10 units or more would increase the number of affordable units in Vallejo overall, ensure that more developments included affordable units, and expand the range of developments in which lower-income residents can afford to live.
- Increase the percentage of affordable units to the more standard 20%. An inclusionary rate of 5% is significantly lower than the regional standard, and would lead to no more than 2 affordable units per 30. Matching or exceeding the standard would ensure that a

[3] *Id.*
[4] Housing Element Appendix 2 at 2-58
[5] For an Inclusionary policy to be consistent with the Transit Oriented Community policy, for example, it may exempt developments with fewer than 11 units. https://mtc.ca.gov/sites/default/files/documents/2026-04/MTC_TOC_PolicyAdministrativeGuidanceApril2026.pdf?cb=99e5fc83. See the Association of Bay Area Governments' Inclusionary Zoning Factsheet for more examples and information: https://abag.ca.gov/sites/default/files/documents/2025-09/InclusionaryZoning-09-25-2025.pdf.

meaningful number of affordable units are developed, show Vallejo to be a leader in equitable housing goals, meet the needs of current residents, and ensure that the City's growth enables everybody to live here.

- We appreciate the unusual inclusion in the draft ordinance of a set-aside for units affordable to very low-income residents, however, as written, the policy is likely to result in vanishingly few such units. We urge you to expand that set-aside from 1% to 5%. This, again, would ensure a meaningful number of units be made available to the very low-income residents of Vallejo, who are facing the greatest risks of instability and displacement.
- The City should explore whether a portion of the very-low-income requirement can be structured to serve extremely-low-income households when paired with project-based vouchers, operating subsidies, supportive housing funding, or other resources that make deeper affordability financially feasible.

Prior to the drafting and adoption process for the Housing Element, the Association of Bay Area Governments determined the number of units at each affordability level that Vallejo would need to develop in order to meet the needs of its residents between 2023 and 2031. Since 2023, the City has received applications to develop 45% of its projected need for market rate housing; it has received applications to develop 5.5% of its projected need for housing affordable to moderate-income households, 17.5% of its projected need for housing affordable to low-income households, and 4% of its projected need for housing affordable to very-low-income households. An ordinance that encourages or requires faster development of housing affordable to lower-income households is necessary to meet the actual, determined needs of the City's residents. Vallejo needs to become a leader in ensuring all of its residents are able to live in homes they afford; the least the City can do is meet the standards set by its peers.

The City Must Solidify An In-Lieu Fee Formula

We additionally urge the City to determine a formula for an in-lieu fee to incorporate into the ordinance now, rather than later, and to require that funds from the fees be set aside to go directly to developing affordable housing. It is our goal to ensure that in-lieu fees are not misused by developers to avoid building affordable housing. Our priority is for developers to build affordable units on site in the same projects and at the same time their market rate housing is built. A properly set in-lieu fees can be a meaningful way to incentivize mixed-income housing, without becoming impractical for developers who may have real constraints on developing affordable units; when developers do have real constraints, in-lieu fees can help to raise money to develop affordable housing later.

The most common way to determine the fee is to calculate the costs based on the gap between the affordable-housing and market-rate costs of building. Another way to calculate the fees would be to determine the gap between the cost to build an affordable unit and the construction loan available to an affordable housing developer. Both formulas require a financial "affordability gap" analysis that takes into consideration the difference between operating costs and incomes

for a variety of housing types (e.g. rental apartment, single family home), and the sales prices or rents affordable by various types of households.[6] The analysis would then allow for a determination of the affordability gap that can be translated into in-lieu fee amounts. Whatever formula is used, we recommend that the in lieu fee be set at 100% of the real cost differential. Because costs are constantly changing, usually increasing, it is best to write a formula into the ordinance rather than stating an amount itself, so that the fees reflect real time construction costs and inflation.

In determining an appropriate in-lieu fee, the City should ensure that the ordinance maintains a strong affordability *and* feasibility standard using incorporating production-oriented tools that improve feasibility of on-site affordable development, including density bonus alignment, parking reductions, expedited review, fee deferrals, and other incentives for projects that provide deeper affordability or exceed minimum requirements. These tools should not be used to weaken the affordability obligation, but rather to ensure that the ordinance produces real affordable units and does not become vulnerable to claims that it discourages housing development.

Finally, the City should establish a dedicated affordable housing fund into which all in-lieu fee revenues are deposited and restricted exclusively for affordable housing purposes, including affordable housing production, acquisition, rehabilitation, preservation, supportive housing development, the conversion of naturally affordable housing or underutilized nonresidential properties into long-term deed-restricted affordable housing and anti-displacement strategies.

The City Must Strengthen the Implementation and Enforcement Procedures Included in its Draft Ordinance

Finally, we urge the City to make an essential addition to the draft ordinance: the ordinance must incorporate a mechanism for implementation and enforcement, including details about what department will be in charge of implementing and enforcing the policy. Assigning ownership over the operation of the ordinance will ensure that it actually gets implemented; without this clarity, its impact may be delayed by years.

The City should also include periodic review and reporting provisions regarding implementation outcomes. Reporting should include the number of affordable units approved and constructed by affordability level, the amount of in-lieu fees collected and expended, the status of affordable housing projects funded through the ordinance, and progress toward meeting the City's identified lower-income housing needs. The ordinance should clearly identify the department or staff responsible for implementation, monitoring, compliance review, affordability covenant enforcement, and public reporting to ensure long-term accountability and effectiveness.

The City should also maintain a publicly accessible dashboard tracking implementation of the ordinance, including units approved, units built, affordability levels, in-lieu fees collected and expended, funded projects, and the pipeline of deeply affordable housing.

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[6] https://www.huduser.gov/periodicals/cityscpe/vol11num2/ch2.pdf (summarizes in-lieu fee calculations taken from two studies: Keyser Marston Associates (2005) and Bay Area Economics (2007))

For all of the above reasons, we urge the City to strengthen its Draft Inclusionary Ordinance before adopting it by: expanding coverage to include all developments with 10 or more units; expand the percentage of units set aside to be affordable to lower-income households to 15% of units affordable for low-income, and 5% affordable to very low-income; establish a meaningful in-lieu fee formula now, rather than waiting.

We thank you for your time and consideration,

Skylar Spear
Staff Attorney
Public Advocates

Cristál Gallegos
Project Director
Vallejo Housing Justice Coalition

Paul Theiss
Sierra Club Solano County

Eli Smith
Vallejo Homeless Union

Melissa Morris
Staff Attorney
Public Interest Law Project

David Lindsay
Common Ground

Ary Smith
Senior Attorney
Legal Services of Northern California

Melvin Cowan
Founder & Principal
Enough Housing

BIA BAY AREA

BUILDING INDUSTRY ASSOCIATION

Sent via email: hector.rojas@cityofvallejo.net

DATE: May 27, 2026

TO: Hector Rojas, Long Range Planning Director, City of Vallejo

FROM: Lisa Vorderbrueggen, Executive Director, East Bay Gov't Affairs, BIA|Bay Area

RE: Comments on May 7, 2026, Public Review Draft of the **Vallejo Inclusionary Housing Ordinance**

Dear Mr. Rojas:

The Building Industry Association of the Bay Area (BIA|Bay Area) represents 400 member companies engaged in the entitlement, development, design and construction of new homes across the nine-county region, including Solano County. We appreciate the opportunity to comment on the city's May 7, 2026, public review draft of the proposed inclusionary housing ordinance and the accompanying feasibility analysis prepared by Economic & Planning Systems, Inc. (EPS), dated March 13, 2026.

After reviewing both documents and relevant studies of inclusionary policies, BIA|Bay Area respectfully urges the city to decline to adopt the proposed inclusionary ordinance. Under current Vallejo market conditions, the ordinance will discourage new housing production, raise costs on projects that do move forward and deliver few — if any — affordable units, while worsening the city's overall housing shortage.

Our concerns and the supporting evidence are summarized below.

1. The city's own feasibility analysis shows the market cannot support the proposed requirements.

The EPS feasibility report is the most important document in this rulemaking, and its conclusions are stark. Of five residential prototypes tested against industry-standard return thresholds, only one —

single-family detached homes — is feasible under current Vallejo conditions, and only marginally so (15.13 percent profit margin against a 15 percent threshold).

- **Small-lot single-family:** 5.73 percent profit margin (15 percent required)
- **Multifamily condominium:** −36.50 percent profit margin — deeply infeasible
- **Baseline-density apartments (30 du/ac):** 4.97 percent yield-on-cost (5.5 percent required)
- **Higher-density apartments (65 du/ac):** 4.70 percent yield-on-cost (5.5 percent required)

EPS itself concludes that *"under current market conditions, it may be challenging to implement any of the inclusionary options as mandatory requirements."* Vallejo's multifamily rents sit 34 percent below the Bay Area median and 5 percent below the rest of Solano County, while construction costs have outpaced rents for two decades. The city's share of countywide multifamily production has collapsed despite Vallejo being Solano County's most populous jurisdiction.

Layering an inclusionary requirement on a market in which most product types are already infeasible does not produce affordable units. It produces no units.

2. Peer-reviewed evidence shows inclusionary zoning reduces supply and raises prices.

The economic case against an inclusionary ordinance in a weak market is established in the empirical literature, including by California researchers studying California cities. A 2019/2021 Mercatus Center synthesis of six studies showed that four found IZ raised prices and three concluded it reduced new production; none found that IZ increased supply.

- **Means & Stringham (2015):** IZ in California reduced housing supply by 7 percent and raised prices 20 percent between 1990 and 2000.
- **Bento et al. (2009):** IZ caused prices to rise 2–3 percent faster in adopting California jurisdictions and reduced single-family starts.
- **Hamilton (2021):** Mandatory IZ raised house prices 0.81–1.1 percent per year per square foot in the Baltimore–Washington region.
- **Schuetz, Meltzer & Been (2011):** In strong markets, IZ reduced supply and raised prices during periods of rising prices.

Nationally, researchers say IZ has delivered an estimated 129,000–150,000 units over the policy's entire history — a trivial figure relative to demand, consistent with the program functioning more like a lottery than a meaningful affordable housing strategy.

3. The 2024 Terner Center / UCLA Lewis Center analysis is decisive.

The most directly applicable analysis of inclusionary tradeoffs is the April 2024 report *Modeling Inclusionary Zoning's Impact on Housing Production in Los Angeles* by Shane Phillips, applying the Terner Housing Policy Simulator to L.A.'s Transit Oriented Communities (TOC) program.

Why it matters for Vallejo. The TOC program is widely regarded as a *best-case* inclusionary program: it is (1) voluntary, (2) provides large bonuses (up to 80 percent density, 55 percent FAR, parking elimination) and (3) operates in one of the strongest housing markets in the country. If problematic tradeoffs appear there, they will be far worse in Vallejo, where the proposed ordinance is mandatory, applies in a market the city's own consultant has documented as infeasible and offers no offsetting incentive beyond the materially less generous State Density Bonus Law.

Finding 1 — The exchange rate is brutal even in the best case. At the most efficient level (16 percent IZ), 4.3 market-rate units are forgone for every below-market-rate (BMR) unit produced. At 11 percent IZ: 4.5 lost; 25 percent IZ: 5.1; 40 percent IZ: 8.9. At *no* IZ level does the policy approach a one-for-one trade.

Finding 2 — Higher requirements eventually produce less of everything. BMR production peaks at ~25 percent IZ (49,500 units over 10 years in the L.A. simulation), then *declines* as the requirement rises. At 40 percent IZ, total housing falls to 96,200 units and BMR production drops to 38,500. Raising the requirement cannot solve a feasibility problem; it deepens it.

Finding 3 — A tiny rent increase wipes out the entire benefit. Phillips quantified the rent discount BMR tenants receive and compared it to the rent pressure that reduced supply imposes on L.A.'s ~740,000 market-rate renter households. Just 0.3–0.9 percent in additional annual rent growth fully negates every BMR unit the policy produces:

- **5 percent IZ:** 0.3 percent faster rent growth negates the $551M annual BMR value.
- **11 percent IZ:** 0.6 percent negates $1.08B.
- **16 percent IZ:** 0.8 percent negates $1.41B.
- **25 percent IZ:** 0.9 percent negates $1.67B.

Real-world IZ effects in the published literature (Hamilton: 0.81–1.1 percent per year; Schuetz et al.: 0.014 percent per year per year of policy age) place actual outcomes squarely within or above this break-even range. By the cited estimates, the policy more than negates its own affordable-housing benefit once costs to market renters are counted.

Finding 4 — Public subsidy is dramatically more cost-effective. The per-unit private subsidy embedded in an extremely-low-income BMR unit is ~$24,000 in year one, versus $13,800 per household for a Housing Choice Voucher in L.A. IZ is roughly 1.7x more expensive per household assisted than the principal federal rental assistance program — before counting supply-side and rent-growth costs. Vouchers and LIHTC are also progressively funded, while IZ functions as a regressive hidden tax on new renters and homebuyers.

Finding 5 — Development bonuses have hard limits. Cities cannot simply pile on larger bonuses. Above 7–8 stories, construction must shift from wood to concrete or steel — ~30 percent more expensive than Type III and 43 percent more than Type V. And value capture is sharply diminishing: a 100 percent density bonus may support 10 percent IZ, but a 300 percent bonus

supports only 18 percent, and a 1,000 percent bonus only 22 percent. The Vallejo draft offers no ordinance-specific bonus at all.

Finding 6 — The report's explicit recommendation.

> *"...policymakers should generally reserve the use of land use reforms for increasing overall housing production to improve affordability and choice in the wider housing market. They should use other tools, including increased public subsidies, to produce BMR homes and assist lower-income households. Public subsidies will be more cost-effective in this context."*

That is precisely the path BIA|Bay Area is urging Vallejo to take.

4. The proposed ordinance compounds these risks with structural defects.

Several features of the May 7 draft make it materially worse than the inclusionary programs studied in the literature — including the L.A. TOC program.

a. Mandatory, with no offsetting incentives. The draft imposes mandatory set-asides on rental and ownership projects of 20+ units (§ 16.XXX.03) with no ordinance-level density bonus, height bonus, parking reduction, fee waiver or concession. While the State Density Bonus Law remains available, its incentives are materially smaller than the layered TOC bonuses Phillips modeled. As Phillips writes: *"mandatory IZ policies without development bonuses are a worst-case approach."*

b. No phasing, no market trigger, no sunset. EPS expressly recommended phasing, alternatives to compliance and market-based triggers (e.g., aggregate units entitled). The draft contains none. It would take effect 180 days after passage regardless of market conditions and continue to apply even if production further collapses.

c. The 20-unit threshold captures exactly what doesn't pencil. EPS shows that multifamily condominiums, baseline-density apartments and higher-density apartments — the product types most likely to occur in 20+ unit projects — are all infeasible today before any inclusionary burden. Applying the ordinance to these projects will ensure they are not built.

d. 55-year covenants and replacement requirements add unmodeled cost. § 16.XXX.06(E) imposes a 55-year affordability covenant; § 16.XXX.03(C) requires one-for-one replacement of existing deed-restricted units. Monitoring, compliance, restricted resale values and lender complications for ownership BMRs are not reflected in EPS's subsidy-gap calculations. The actual feasibility hit will be larger than the report indicates.

e. In-lieu fees set by later resolution create regulatory uncertainty. § 16.XXX.04 defers the in-lieu fee to a future council resolution. Developers underwriting land today cannot price an obligation that has not been set. EPS's economically equivalent in-lieu fees range from ~$8 to $50 per

square foot of market-rate space; at the high end, a 100-unit condominium project would carry a ~$5.95 million in-lieu obligation on top of construction costs that already exceed sale value.

5. The likely outcome is fewer homes — and fewer affordable homes.

Taken together, the EPS findings and the empirical literature point to a clear, predictable outcome if the city adopts this ordinance as drafted:

- **Fewer projects will pencil and fewer will be built.** In the Terner L.A. simulation, moving from 0 percent to just 1 percent IZ reduced market-rate production by 71,400 units over 10 years. In a weaker market like Vallejo, the proportional effect will be at least as severe.
- **Vallejo will fall further behind its RHNA obligations.** The 6th Cycle Housing Element requires planning for 2,900 units, including 1,554 at Moderate Income or below. An ordinance that suppresses overall production undermines progress toward both market-rate and lower-income categories.
- **Few — if any — affordable units will actually be produced on-site.** With most prototypes infeasible at market rate, BMR units will not materialize. Developers who do proceed will rationally pay the in-lieu fee, shifting the strategy from unit production to fee collection at fee levels that themselves further suppress production.
- **Rents and prices in the existing housing stock will face upward pressure.** The cost of reduced supply is borne by all renters and buyers — disproportionately by lower-income households who do not receive a BMR unit. Phillips' 0.3–0.9 percent break-even threshold is well within the empirical range of actual IZ effects.

This is the central irony of inclusionary zoning: a policy adopted to help lower-income households can, in a weak or constrained market, make their situation worse.

6. Recommendations: Decline to adopt the ordinance and pursue strategies that expand supply.

For the reasons set forth above, BIA|Bay Area respectfully urges the Vallejo City Council to decline to adopt the proposed inclusionary ordinance.

The city's own consultant has documented that the Vallejo market cannot support the ordinance. The empirical literature consistently shows that, in markets like Vallejo, the policy will reduce supply, raise prices and produce few units. The 2024 Terner analysis — the most rigorous parcel-level modeling of inclusionary tradeoffs to date — concludes that public subsidies, not land use mandates, are the appropriate tool for producing below-market housing.

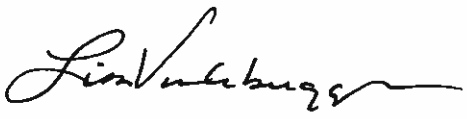
Instead, we encourage the city to direct its limited staff and policy bandwidth toward measures that the evidence shows will actually expand housing access:

- **Reduce the cost and time of building.** Streamline entitlements, lower impact fees (EPS's appendix shows $48,000–$70,000 per unit), reduce parking requirements and expand by-right multifamily zoning.
- **Allow low-cost housing typologies.** Small multifamily, courtyard apartments and missing-middle housing in more residential zones. Phillips notes such reforms "would lower per-unit land and construction costs and expand the number of parcels where redevelopment is feasible."
- **Use targeted public subsidies.** LIHTC, HCD programs and Housing Choice Vouchers — which Terner cites as roughly 40 percent less expensive per household than IZ — to produce and preserve deed-restricted affordable housing.
- **Partner with nonprofit affordable developers** on city-owned or city-assembled sites, where public subsidy can be deployed efficiently and at the depths of affordability the ordinance contemplates.

If, notwithstanding the evidence, the council elects to proceed with some form of inclusionary policy, we urge — at minimum — every safeguard EPS identified and Terner validates: a voluntary, incentive-based structure with meaningful local density, FAR and parking incentives layered on top of the State Density Bonus and modeled on the L.A. TOC framework; market-based triggers tied to verified improvement in feasibility; phasing over multiple years; in-lieu fees set materially below the economically equivalent subsidy gap; geographic and product-type differentiation; and a sunset and mandatory re-study provision. None are present in the current draft.

BIA|Bay Area and our member companies stand ready to work constructively with city staff, the Planning Commission and the City Council to develop a housing strategy that delivers measurable results for Vallejo residents. We thank you for your consideration of these comments and would welcome the opportunity to meet to discuss them further.

Sincerely,



Lisa Vorderbrueggen
Executive Director, East Bay Gov't Affairs
BIA|Bay Area
lvorderbrueggen@biabayarea.org
925-348-1956 (mobile)

References

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Fair Housing Advocates of Northern California

851 Irwin Street, Suite 218, San Rafael, CA 94901 ▼ (415) 457-5025 ▼ TDD: (800) 735-2922
www.fairhousingnorcal.org ▼ fhanc@fairhousingnorcal.org

SENT VIA EMAIL ONLY: hector.rojas@cityofvallejo.net

May 27, 2026

Hector Rojas
Long-Range Planning Manager
City of Vallejo
555 Santa Clara Street
Vallejo CA 94590

RE: Vallejo's Draft Inclusionary Housing Ordinance

Dear Mr. Rojas:

We are writing regarding Vallejo's Draft Inclusionary Housing Ordinance.

Fair Housing Advocates of Northern California (FHANC) is a private nonprofit organization dedicated to assisting individuals experiencing housing discrimination and educating the community, including tenants, housing providers, and government employees, as to their rights and responsibilities under federal and state fair housing laws. The mission of FHANC is to ensure equal housing opportunity and to educate the community on the value of diversity in housing.

FHANC provides free comprehensive fair housing counseling services to individuals alleging housing discrimination in Sonoma County (except the incorporated city of Petaluma), Marin County, Solano County, and Napa County. FHANC also provides other services, such as prepurchase and foreclosure prevention services and trainings to housing providers in other neighboring counties.

In addition to counseling and education services, FHANC recruits, trains, and employs fair housing testers in order to investigate claims of housing discrimination and to assist in conducting systemic investigations.

We appreciate the City taking steps to enact an inclusionary housing ordinance to create more affordable housing in the City. Such a policy is key to meeting the City's duty to affirmatively further fair housing, as enacting an inclusionary policy constitutes a meaningful action that can contribute to replacing segregated living patterns with integrated and balanced living patterns.[1] Inclusionary policies are likely to benefit members of protected classes.

However, we would urge the City to enact a stronger inclusionary ordinance, following the lead of other Bay Area cities, by requiring at least 15-20% of units in residential projects to be affordable.[2] In California, the affordable unit requirements in inclusionary policies are typically between 10-20%, with

[1] *See* https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf
[2] *See* https://www.urbandisplacement.org/wp-content/uploads/2021/08/urbandisplacementproject_inclusionaryhousingbrief_feb2016_revised.pdf

15% being a common standard.[3] As Vallejo's ordinance falls significantly below this requirement, we would strongly urge the City to consider increasing the required percentage of affordable units. A strong inclusionary policy is essential step to furthering fair housing.

Thank you for your consideration and the opportunity to comment on the proposed ordinance.

Sincerely,

Caroline Peattie
Caroline Peattie
Executive Director Emerita
peattie@fairhousingnorcal.org

Julia Howard-Gibbon
Co-Executive Director & Legal Director
julia@fairhousingnorcal.org

Savannah Wheeler
Savannah Wheeler
Senior Housing and Policy Attorney
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[3] *See* https://welp.org/wp-content/uploads/2018/12/inclusionary-factsheet_v2.pdf; https://siliconvalleyathome.org/resources/inclusionary-housing/

STAFF REPORT – PLANNING
CITY OF VALLEJO
PLANNING COMMISSION

DATE: September 9, 2026

TO: Planning Commission

FROM: Cesar Orozco, Planning Manager - Current Development

SUBJECT: **HOLD A PUBLIC HEARING AND CONSIDER A RESOLUTION APPROVING A VARIANCE (PLN26-0151) FOR A 12-FOOT SECURITY STEEL WALL AROUND THE POLICE DISPATCH MODULAR BUILDINGS LOCATED AT 111 AMADOR STREET (APN:0056-216-080) AFTER FINDING THE PROJECT EXEMPT FROM ENVIRONMENTAL REVIEW PURSUANT TO CEQA GUIDELINES SECTION 15303 (CLASS 3 - "NEW CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES")**

PROJECT INFORMATION

Project Name:	Police Dispatch Security Steel Wall
Project Summary:	The project consists of the installation of a 12-foot steel security wall adjacent to the new police dispatch modular building to provide enhanced protection.
Location:	111 Amador Street | APN:0056-216-080
Applicant:	Leonard Job — City of Vallejo Public Works Director
Owner:	City of Vallejo
General Plan Land Use Designation:	Public Facilities and Insitutions
Zoning District:	Public and Semi-Public
CEQA:	The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15303 (Class 3 — "New Construction or Conversion of Small Structures") of the state CEQA Guidelines.

RECOMMENDATION

Staff recommends that, following the public hearing, the Planning Commission adopt a Resolution finding the project exempt from environmental review pusuant to CEQA guidelines (Class 3 - "New Construction or Conversions of Small Strutures") and approve a Variance (PLN26-0151), based on the findings provided in the attached Resolution and subject to the Conditions of Approval provided as Exhibit A to the Resolution.

ATTACHMENTS

1.	Staff Report

2.	Recommended Resolution
3.	Exhibit B to the Resolution - Project Plans
4.	City Council Resolution - 24-061

CONTACT

Cesar Orozco, Planning Manager - Current Development
707.648.5436 | cesar.orozco@cityofvallejo.net

BACKGROUND AND DISCUSSION

Background

On October 24, 2023, City Council directed staff to move the Vallejo Police Department Emergency Dispatch Center into temporary modular units on the same site as the Vallejo Police Department Headquarters Building located at 111 Amador Street, Assessor's Parcel Number: 0056-216-080 ("Project Site").

On May 14, 2024, the City Council unanimously approved City Council Resolution No. 24-061 N.C., approving the construction and temporary use of two modular buildings to be combined into a single 1,440-square-foot Emergency Dispatch Center at the Project Site, and finding the project to be exempt from CEQA.

On August 14, 2026, City of Vallejo Public Works Director, Leonard Job ("Applicant"), submitted an application for a Variance (PLN26-0151) to allow the installation of a 12-foot-tall steel security wall adjacent to the new police dispatch modular buildings to enhance site security and provide additional protection for the facility and its occupants.

Location and Land Use Context

The project site consists of a 5.4-acre developed parcel located off Amador Street. The site includes a portion of the Vallejo Police Department, the modular dispatch building, and the City of Vallejo Public Works Corporation Yard. The site is generally at grade level and is surrounded by existing residential and commercial development.

The immediate vicinity of the project site is characterized by existing residential development, with Georgia Street to the north; Amador Street to the east, with residential development on the opposite side; Maine Street to the south, with commercial and industrial uses beyond; and the California Northern Railroad line to the west, with residential development on the opposite side (see Figure 1).

Figure 1 – Vicinity Map

Interstate 80 (I-80) and Interstate 780 (I-780) provide regional access, while Amador Street provides direct access to the site. The subject site has a Land Use Designation of Public Facilities and Institutions and is implemented by the Public and Semi-Public (PS) Zoning District.

Project Description

The project consists of the installation of a 12-foot-tall steel security wall adjacent to the new police dispatch modular buildings to enhance site security and provide additional protection for the facility and its occupants (see Figure 2 and 3). The new modular building has an overall height of 14 feet and eight-inches and set back approximately six feet from the front property line. A Variance is requested because the maximum fence height permitted within the required front yard of the PS zoning district is three feet. The fence height may be increased to a maximum of six feet if the fence is set back a total of 15 linear feet from Amador Street.

Figure 2 – Proposed Site Plan

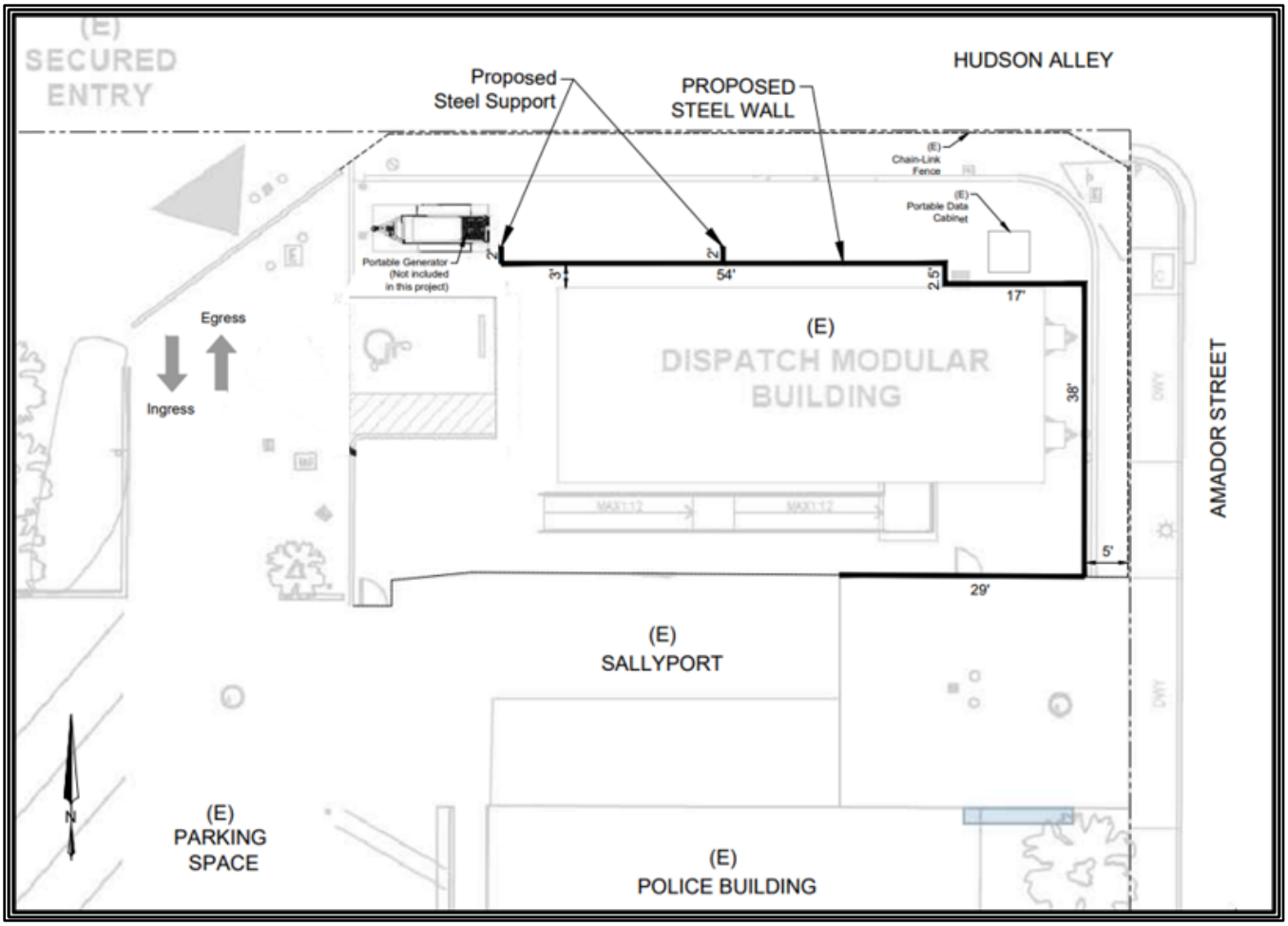
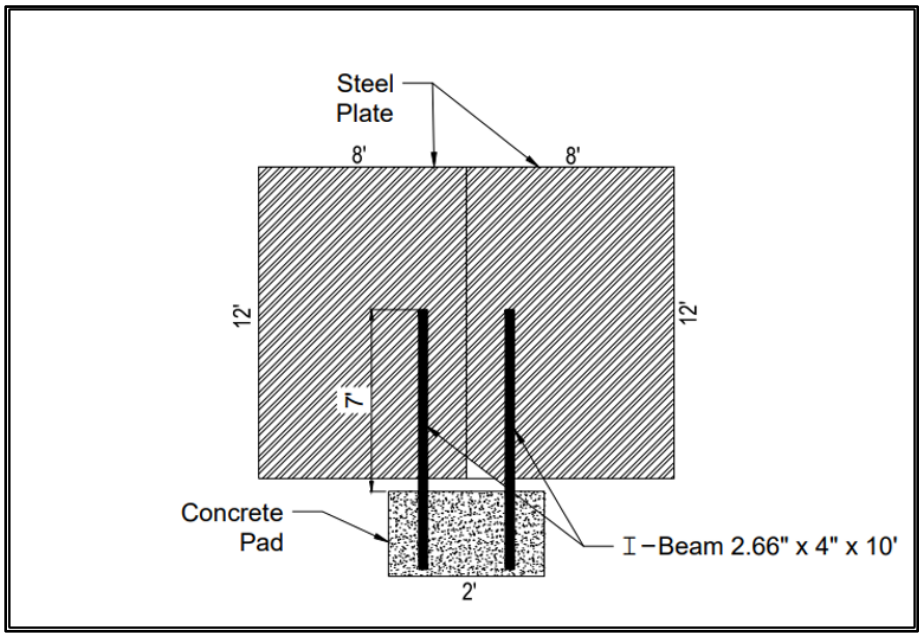


Figure 2 – Proposed Wall Elevation



CODE COMPLIANCE

I. Required Entitlements & Findings

The proposed project requires a Variance[1] to allow modification of a dimensional standard to allow a 12-foot steel wall where a three-foot wall would otherwise be the maximum wall height allowed. The Planning Commission is requested to take action on the project and can either approve, conditionally approve or deny the request.

a. Variance Findings

Vallejo Municipal Code (VMC) Section 16.607.03 – Required findings for a Variance, requires the review authority to make the following findings:

i. That a hardship peculiar to the property and not created by any act of the owner exists. In this context, personal, family or financial difficulties, loss of prospective profits and neighboring violations are not hardships justifying a variance. Further, a previous variance can never set a precedent, for each case must be considered only on its individual merits;
ii. That such variance is necessary for the preservation and enjoyment of substantial property rights possessed by other conforming property in the same vicinity and that a variance, if granted, would not constitute a special privilege of the recipient not enjoyed by his neighbors;
iii. That the granting of the variance will not be materially detrimental to the public health, safety or welfare or will not impair an adequate supply of light and air to adjacent property;

[1] VMC Chapter 16.607 - Variances

iv. That the conditions upon which the requested variance is based would not be applicable, generally, to other property within the same zoning classification;
v. That either the variance is so insignificant that granting it will not be incompatible with the general plan; or the potentially adverse effects of the variance on said plan, which would be avoided by denying the variance, are exceeded by the individual hardship which would be relieved by granting the variance; and
vi. The project has been reviewed in compliance with the California Environmental Quality Act, if applicable, and the requirements of this chapter.

II. STAFF ANALYSIS

Staff believes that all applicable Variance findings listed above can be made for the proposed project. A summary of staff's analysis is included below, with specific analysis associated with each required finding, including recommended statements of fact, incorporated into the attached Recommended Resolution (Attachment 3).

i. General Plan Consistency

The General Plan 2040 Land Use Designation for the subject property is Public Facilities and Institutions (PF). The General Plan provides the following description for the PF land use designation:

> *The PF designation encompasses facilities serving the good of the community, including fire and police stations; government buildings; health and social service clinics; hospitals; libraries; schools; educational institutions; and transit stations, as well as churches, community centers and community-serving recreational facilities. In some cases, it includes excess public rights-of-way. Assisted living facilities and neighborhood-oriented retail are conditional uses in this designation requiring permits. Co-location of multiple public facilities on a single site is encouraged where it will increase access to community services while offering cost savings and other benefits to community service providers. The maximum permitted FAR in the PF designation is from 0.1 to 1.0, determined on a case-by-case basis in consideration of the neighborhood context.*

The existing uses of the subject site include the City of Vallejo Police Station, the new police dispatch modular buildings, and the City of Vallejo Public Works corporation yard. These facilities provide essential public and municipal services to the community and are consistent with the PF Land Use Designation, which encompasses facilities serving the good of the community, including police stations and government buildings. The proposed project would install a 12-foot steel security wall adjacent to the new police dispatch modular buildings to protect the building, essential dispatch services, and occupants, thereby helping ensure that dispatch operations remain secure and uninterrupted. The proposed security improvement is ancillary to and supports the continued operation of the existing public facilities and is therefore consistent with the intent of the PF Land Use Designation.

ii. Zoning Code Compliance

The project site is zoned Public and Semi-Public (PS). The Zoning Code provides the following description for the PS Zoning District:

> *The PS Zoning District is intended to regulate areas that provide governmental and quasi-governmental services and supportive services.*

VMC Table 16.102-A, Zoning Districts, provides that the PS zoning district implements the PF General Plan Land Use Designation. The proposed project has been reviewed against the applicable development

standards set forth in VMC Chapter 16.505, Fences, Walls and Screening, specifically VMC Section 16.505.04, Height Standards for Fences and Walls.

VMC Section 16.505.04(C.6.a), All Other Building Sites: Within the Required Front Yard, states: *Except as provided in Section 16.104.15, Measuring Height of Fences and Walls, the maximum height of fences and walls located within any required front yard shall be three feet unless the traffic engineer, as part of zoning compliance review, pursuant to Chapter 16.603, Zoning Compliance Review, determines that a four-foot fence would not create a visibility hazard. The maximum height of a fence or wall beyond the required front yard is six feet*. Accordingly, along the front property line adjacent to Amador Street, the maximum permitted wall height is three feet. Once the wall is set back a minimum of 10 feet from the front property line, the maximum permitted wall height may increase to six feet.

The new modular police dispatch building is located approximately six feet from the front property line. As a result, a wall located in front of the building would be subject to the three-foot maximum height standard. Installation of a three-foot wall would leave approximately 11 feet and 8 inches of the modular building exposed above the wall. The City could pursue Zoning Compliance Review to allow a four-foot wall, subject to the Traffic Engineer determining that the increased height would not create a visibility hazard. However, a four-foot wall would still leave approximately 10 feet and 8 inches of the modular building exposed.

An Exception could also provide limited relief from the applicable dimensional requirements, as an Exception *may grant relief from the dimensional requirements specified in the Zoning Code by not more than 25 percent of the applicable requirement.* In conjunction with Zoning Compliance Review, an Exception could allow a maximum wall height of five feet. Even at five feet in height, approximately 9 feet and 8 inches of the modular building would remain exposed.

The foregoing alternatives demonstrate that strict application of the applicable fence and wall height standards would not provide adequate security protection for the new police dispatch modular building. A three-, four-, or five-foot wall would still leave a substantial portion of the building exposed, including areas of the structure that could be vulnerable to unauthorized access or other security threats. The proposed 12-foot steel security wall would substantially limit the exposed portion of the modular building, leaving approximately two feet and eight inches visible above the wall. This remaining exposed area consists primarily of clear space associated with the attic, which contains structural components and mechanical systems. The proposed height is therefore necessary to provide an appropriate level of physical security for the dispatch facility, its occupants, and the essential services provided from the site.

Based on the unique physical circumstances of the subject property, the constrained location of the new modular police dispatch building, and the need to maintain adequate security for an essential public safety facility, strict application of the applicable fence and wall height standards would create a hardship that would prevent the City from providing an appropriate level of security for the facility. The requested variance would provide the minimum relief necessary to address the site's unique circumstances, would not constitute a special privilege, would not be detrimental to public health, safety, or welfare, would not adversely affect adjacent properties, and would not be incompatible with the General Plan 2040.

ENVIRONMENTAL REVIEW

Under the California Environmental Quality Act (CEQA), the State CEQA Guidelines identify classes of projects that have been determined not to have a significant effect on the environment and are therefore exempt from CEQA review. Section 15303(e) (Class 3, “New Construction or Conversion of Small Structures”) of the CEQA Guidelines exempts

the construction and location of limited numbers of new, small facilities or structures, including accessory (appurtenant) structures such as fences/walls.

The proposed project consists of the installation of a 12-foot-tall steel security wall adjacent to the new police dispatch modular building to enhance site security and provide additional protection for the facility and its occupants. The proposed security wall is an accessory structure to the new police dispatch modular building and will be installed on a previously developed site. The Project does not involve the construction of a new principal building or a change in the existing use of the site. The Project Site is served by existing streets, utilities, and public services, and the surrounding area is not environmentally sensitive. No environmentally sensitive resources have been identified on or adjacent to the Project Site. Accordingly, the Project qualifies for Class 3 categorical exemption pursuant to Section 15303(e) of the CEQA Guidelines.

Further, none of the exceptions to the use of a categorical exemption set forth in CEQA Guidelines Section 15300.2 apply:

a. The Project Site is not located in a particularly sensitive environment, including mapped wetlands, riparian corridors, designated habitat for special-status species, or other environmentally sensitive areas; and

b. The Project, when considered together with the effects of past, current, and reasonably foreseeable future projects of the same type in the vicinity, would not result in cumulatively considerable impacts; and

c. There are no unusual circumstances associated with the Project that would result in a reasonable possibility of a significant adverse effect on the environment; and

d. The Project Site is not located within a designated scenic highway corridor, and the Project would not damage scenic resources, including trees, rock outcroppings, historic buildings, or other features visible from a scenic highway; and

e. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5; and

f. The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Sections 15064.5 and 15300.2(f).

The Planning Commission has independently reviewed and considered the proposed categorical exemption, the administrative record, and all evidence presented before taking action on the Project. Based on the foregoing, the Project qualifies for the Class 3 categorical exemption pursuant to CEQA Guidelines Section 15303(e). Accordingly, no further environmental review is required.

NOTICE AND COMMENTS

On August 26, 2026, pursuant to VMC Section 16.602.08, notice of this hearing was published in the Timers Hearld, mailed to all active neighborhood groups, all property owners and occupants within 500 feet of the subject property, any other interested parties and local agencies expected to provide water, wastewater treatment, and/or other essential facilities or services to the project, the Vallejo City Unified School District and electronically mailed to the members of the Planning Commission, the applicant and property owner.

As of the writing of this report, the staff has not received any comments.

CONCLUSION

Staff recommends the Planning Commission find the project to be exempt from environmental review pursuant to CEQA Guidelines Section 15303 (Class 3 – "New construction or conversion of Small Structures"), and approve a Variance (PLN26-0151) based on the findings provided in the attached resolution and subject to the Conditions of Approval provided as Exhibit A to the Recommended Resolution.

EXPIRATION

Pursuant to VMC Section 16.602.12(A.2), approval of a Variance (PLN26-0151) shall automatically expire 2 years after the entitlement becomes active, unless authorized construction has commenced prior to the expiration date (September 19, 2028; if approved at this meeting and not appealed). Pursuant to VMC Section 16.602.11, a final decision on an application for any discretionary approval subject to appeal shall become effective after the expiration of ten calendar days following the date of action, unless an appeal is filed.

APPEAL PROCEDURE

The applicant, or any party adversely affected by the decision of the Planning Commission, may, within ten days after the rendering of the decision of the Planning Commission, appeal in writing to the City Council by filing a written appeal with a fee as prescribed in the Master Fee Schedule with the City Clerk. Such written appeal shall state the reason or reasons for the appeal and why the applicant believes he or she is adversely affected by the decision of the Planning Commission. Such appeal shall not be timely filed unless it is received by the City Clerk or designee no later than the close of business on the tenth calendar day after the rendition of the decision of the Planning Commission. If such date falls on a weekend or City holiday, then the deadline shall be extended until the next regular business day.

Notice of the appeal, including the date and time of the City Council's consideration of the appeal, shall be sent by the City Clerk to all property owners within five hundred feet of the project boundary. The Council may affirm, reverse, or modify any decision of the Planning Commission that is appealed.

LEVINE ACT: GOVERNMENT CODE 84308

This item is subject to the Levine Act. City elected and appointed officials, including candidates for City elected office, (City Officers) who have received a campaign contribution of more than $500 within 12 months prior from a party, participant, or their representatives involved in this proceeding may do either of the following: (1) disclose the contribution on the record and recuse themselves from this proceeding; OR (2) return the portion of the contribution that exceeds $500 within 30 days from the time the elected official knew or should have known about the contribution and participate in the proceeding.

All parties, participants, and their representatives must disclose on the record of this proceeding any contribution of more than $500 made to the city officers, such as the mayor and/or councilmembers, within 12 months prior to the date of the proceeding. City officers are prohibited from accepting, soliciting, or directing a contribution of more than $500 from a party, participant, or their representatives during a proceeding and for 12 months following the date a final decision is rendered.

CITY OF VALLEJO PLANNING COMMISSION

RESOLUTION NO. PC 26-XX

A RESOLUTION OF THE PLANNING COMMISSION APPROVING A VARIANCE (PLN26-0151) FOR A 12-FOOT-TALL STEEL SECURITY WALL ADJACENT TO THE NEW PLICE DISPATCH MODULAR BUILDING AT 111 AMADOR STREET (APN:0056-216-080) AFTER FIDNING THE PROJECT EXEMPT FROM CEQA PURSUANT TO SECTION 15303 (e) (CLASS 3- NEW CONTRUCTION OR CONVERSION OF SMALL STRUCTURES)

* *

WHEREAS, on August 29, 2017, the Vallejo City Council ("City Council") adopted the City of Vallejo General Plan 2040; and

WHEREAS, on June 22, 2021, the City Council adopted the new Zoning Code and Zoning Map; and

WHEREAS, on October 24, 2023, City Council directed staff to move the Vallejo Police Department Emergency Dispatch Center into temporary modular units on the same site as the Vallejo Police Department Headquarters Building located at 111 Amador Street, Assessor's Parcel Number: 0056-216-080 ("Project Site"); and

WHEREAS, on May 14, 2024, the City Council unanimously approved City Council Resolution No. 24-061 N.C., approving the construction and temporary use of two modular buildings to be combined into a single 1,440-square-foot Emergency Dispatch Center located at 111 Amador Street, and finding the project exempt from CEQA pursuant to CEQA Guidelines Sections 15303 and 15304; and

WHEREAS, on July 10, 2025, the City of Vallejo Building Division issued a building permit (CC24-00001) for the installation of the modular building for the use of Vallejo Police Department Emergency Dispatch Center; and

WHEREAS, on August 14, 2026, City of Vallejo Public Works Director, Leonard Job ("Applicant"), submitted an application for a Variance (PLN26-0151) to allow the installation of a 12-foot-tall steel security wall adjacent to the new police dispatch modular buildings to enhance site security and provide additional protection for the facility and its occupants ('the project") at the project site; and

WHEREAS, the Project Site has a General Plan 2040 land use designation of Public Facilities and Institutions and is implemented by the Public and Semi-Public Zoning District; and

WHEREAS, on August 26, 2026, pursuant to Vallejo Municipal Code (VMC) Section 15.08.040(D), notice of the September 9, 2026, public hearing before the Planning Commission was published in the *Times-Herald*, mailed to all active neighborhood groups; property owners and/or occupants within 500 feet of the Project Site; the Vallejo City Unified School District; any other local agency expected to provide water, wastewater treatment, or other essential facilities or services to the Project; and was electronically mailed to the Planning Commissioners, the applicant, the property owner, and interested parties; and

WHEREAS, on September 9, 2026, the City of Vallejo Planning Commission, after giving all public notices required by State law and the City of Vallejo Municipal Code, conducted a duly noticed public hearing.

NOW, THEREFORE, LET IT BE RESOLVED that the Planning Commission hereby finds, determines, and resolves, as follows:

Section 1. Recitals.

The foregoing recitals are true and correct, and the same as incorporated herein by reference.

Section 2. Record.

The Record of Proceedings ("Record") upon which the Planning Commission bases its decision includes, but is not limited to: (a) the application, including all designs, plans, studies, data and correspondence submitted to the City in connection with the Project; (b) all staff reports, other documentation and information produced by or on behalf of the City in connection with the Project; (c) all documentary and oral evidence received at the public hearings regarding the Project; (d) all matters of common knowledge and all official enactments and acts of the City, including without limitation: (i) the City of Vallejo General Plan 2040 and its related EIR; (ii) the 2021 Zoning Code and its Initial Study and Mitigated Negative Declaration; (iii) the Vallejo Municipal Code; (iv) all designs, plans, studies, data and correspondence submitted to the City in connection with the Project; (v) all documentary and oral evidence received at the public hearing regarding the Project; (vi) other applicable City of Vallejo policies and regulations; and (vii) all applicable state and federal laws, rules, regulations, reports, records and projections related to development within the City of Vallejo and its surrounding areas.

The Custodian of Record is the Director of the Planning and Development Services of the City of Vallejo, 555 Santa Clara Street, Vallejo, California 94590.

Section 3. California Environmental Quality Act

Under the California Environmental Quality Act (CEQA), the State CEQA Guidelines identify classes of projects that have been determined not to have a significant effect on the environment and are therefore exempt from CEQA review. Section 15303(e) (Class 3, “New Construction or Conversion of Small Structures”) of the CEQA Guidelines exempts the construction and location of limited numbers of new, small facilities or structures, including accessory (appurtenant) structures such as fences/walls.

The proposed project consists of the installation of a 12-foot-tall steel security wall adjacent to the new police dispatch modular building to enhance site security and provide additional protection for the facility and its occupants. The proposed security wall is an accessory structure to the new police dispatch modular building and will be installed on a previously developed site. The Project does not involve the construction of a new principal building or a change in the existing use of the site. The Project Site is served by existing streets, utilities, and public services, and the surrounding area is not environmentally sensitive. No environmentally sensitive resources have been identified on or adjacent to the Project Site. Accordingly, the Project qualifies for Class 3 categorical exemption pursuant to Section 15303(e) of the CEQA Guidelines.

Further, none of the exceptions to the use of a categorical exemption set forth in CEQA Guidelines Section 15300.2 apply:

a. The Project Site is not located in a particularly sensitive environment, including mapped wetlands, riparian corridors, designated habitat for special-status species, or other environmentally sensitive areas; and

b. The Project, when considered together with the effects of past, current, and reasonably foreseeable future projects of the same type in the vicinity, would not result in cumulatively considerable impacts; and

c. There are no unusual circumstances associated with the Project that would result in a reasonable possibility of a significant adverse effect on the environment; and

d. The Project Site is not located within a designated scenic highway corridor, and the Project would not damage scenic resources, including trees, rock outcroppings, historic buildings, or other features visible from a scenic highway; and

e. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5; and

f. The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Sections 15064.5 and 15300.2(f).

The Planning Commission has independently reviewed and considered the proposed categorical exemption, the administrative record, and all evidence presented before taking action on the Project. The Planning Commission finds that the determination that the Project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303(e) (Class 3, New Construction or Conversion of Small Structures) reflects the independent judgment and analysis of the City of Vallejo.

Based on the foregoing, the Project qualifies for the Class 3 categorical exemption pursuant to CEQA Guidelines Section 15303(e). Accordingly, no further environmental review is required.

Section 4. Variance Findings

A. That a hardship peculiar to the property and not created by any act of the owner exists. In this context, personal, family or financial difficulties, loss of prospective profits and neighboring violations are not hardships justifying a variance. Further, a previous variance can never set a precedent, for each case must be considered only on its individual merits;

Facts in support: The property is uniquely utilized for essential public safety operations, including the City's police dispatch functions, which require enhanced physical security to protect the facility, its occupants, and the continuity of emergency services. The proposed 12-foot steel security wall is necessary to provide an appropriate level of security for this specialized public safety use. The need for such security measures is a condition peculiar to the property because the site's use as a police dispatch facility is distinct from the surrounding properties and is not a circumstance generally shared by neighboring properties. The location of the proposed wall within the required front-yard setback results from the existing site configuration and the operational and security requirements of the dispatch facility, rather than from any act of the property owner intended to create or manufacture a hardship.

B. That such variance is necessary for the preservation and enjoyment of substantial property rights possessed by other conforming property in the same vicinity and that a variance, if granted, would not constitute a special privilege of the recipient not enjoyed by his neighbors;

Facts in support: The property is used for essential public safety operations, including police dispatch services, and the proposed 12-foot steel security wall is necessary to provide adequate security and protection for the facility and its occupants. The Variance is necessary to allow the property to be reasonably used for its intended public safety purpose while maintaining appropriate safety and security measures. The requested Variance is limited to the height of the security wall within the required front-yard setback and is directly related to the unique operational and security needs of the site. Granting the Variance would not provide the property owner with a special privilege, but rather would allow the property to accommodate the security requirements associated with its public safety use in a manner that is not applicable to surrounding properties with different uses.

C. That the granting of the variance will not be materially detrimental to the public health, safety or welfare or will not impair an adequate supply of light and air to adjacent property;

Facts in support: The proposed 12-foot steel security wall is intended to enhance site security and promote the safety of the police dispatch operations occurring on the property, thereby supporting public health, safety, and welfare. The wall will be located approximately 50 feet from the nearest adjoining property to the north and approximately 95 feet from the adjoining property to the east, providing sufficient separation to ensure that the proposed wall will not materially impair an adequate supply of light and air to adjacent properties. In addition, the proposed wall is located outside of the sight-distance triangular area formed by the intersecting curb lines (or edge of pavement where no curbs exist) and a line joining points on those curb lines at a distance of 12 feet from their intersection. As a result, the proposed wall will not obstruct the required sight distance for vehicles entering or exiting Hudson Alley, thereby maintaining adequate visibility and minimizing potential impacts to traffic and public safety.

D. That the conditions upon which the requested variance is based would not be applicable, generally, to other property within the same zoning classification;

Facts in support: The conditions giving rise to the requested Variance are unique to the property because the site is being used for a specific and essential public safety purpose, including police dispatch operations. Unlike other properties within the same zoning classification, the site requires enhanced security measures to protect the facility, its occupants, and the continuity of emergency services. The proposed 12-foot steel security wall is specifically necessary to address the operational and security requirements associated with this public safety use and is not a condition that would generally apply to other properties within the same zoning classification.

E. That either the variance is so insignificant that granting it will not be incompatible with the general plan; or the potentially adverse effects of the variance on said plan, which would be avoided by denying the variance, are exceeded by the individual hardship which would be relieved by granting the variance; and

Facts in support: The proposed 12-foot steel security wall would extend approximately 140 linear feet and would occupy only a limited portion of the property. The wall is intended to enhance site security and provide additional protection for the police dispatch facility and its occupants, consistent with the

property's essential public safety use. The Variance is limited to allowing the wall to exceed the three-foot maximum height within the required front-yard setback and would not alter the underlying use or development of the property. Given the limited area affected by the Variance and the wall's direct relationship to the site's public safety function, granting the Variance would not create an inconsistency with the General Plan nor result in adverse effects that would outweigh the operational and security needs of the property.

F. The project has been reviewed in compliance with the California Environmental Quality Act, if applicable, and the requirements of this chapter.

Facts in support: See Section 3. California Environmental Quality Act, above.

Section 5. Decision.

BE IT RESOLVED THAT the Planning Commission hereby determines that the Project is exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303 (e); and

BE IT FURTHER RESOLVED THAT the Planning Commission hereby approves a Variance (PLN26-0151) based on the above findings and subject to the Conditions of Approval set forth in ***Exhibit A***, and the time limitations and indemnity below.

Section 6. Time Limitations & Indemnity.

a) Applicant shall defend, indemnify, and hold harmless the City and its agents, officers, attorneys, and employees from any claim, action, or proceeding brought against the City or its agents, officers, attorneys, or employees to attack, set aside, void, or annul the action(s) at issue herein. This indemnification shall include damages or fees awarded against the City, if any, costs of suit, attorneys' fees, and other costs and expenses incurred in connection with such action, whether incurred by the Applicant, the City, and/or parties initiating or bringing such action.

b) Applicant shall defend, indemnify, and hold harmless the City and its agents, officers, attorneys, and employees for all costs incurred in additional investigation of or study of, or for supplementing, preparing, redrafting, revising, or amending any document, if made necessary by said legal action and the Applicant desires to pursue securing such approvals, after initiation of such litigation, which are conditioned on the approval of such documents in a form and under conditions approved by the City Attorney.

c) In the event that a claim, action, or proceeding described in paragraphs a. or b. above is brought, the City shall promptly notify the Applicant of the existence of the claim, action, or proceeding, and the City will cooperate fully in the defense of such claim, action, or proceeding. Nothing herein shall prohibit the City from participating in the defense of any claim, action, or proceeding; the City shall retain the right to: (1) approve the counsel to so defend the City; (ii) approve all significant decisions concerning the manner in which the defense is conducted; and (iii) approve any and all settlements, which approval shall not be unreasonably withheld. The City shall also have the right not to participate in said defense, except that the City agrees to cooperate with the Applicant in the defense of said claim, action, or proceeding. If the City chooses to have counsel of its own to defend any claim, action, or proceeding where the Applicant has already retained counsel to defend the City in

such matters, the fees and expenses of the counsel selected by the City shall be paid by the City. Notwithstanding the immediately preceding sentence, if the City Attorney's Office participates in the defense, all City Attorney fees and expenses shall be paid by the Applicant.

d) The Applicant, property owner and/or any successor(s) in interest, whether in whole or in part, to either of them, indemnifies the City for the City's costs, fees, and damages which the City incurs in enforcing the above indemnification provisions.

e) Pursuant to VMC Section 16.602.14, the Applicant, or any party adversely affected by the decision of the Planning Commission, may, within ten days after the rendering of the decision of the Planning Commission, appeal in writing to the City Council by filing a written appeal with a fee as prescribed in the Master Fee Schedule with the City Clerk. Such a written appeal shall state the reason or reasons for the appeal and why the applicant believes he or she is adversely affected by the decision of the Planning Commission. Such appeal shall not be timely filed unless it is actually received by the City Clerk or designee no later than the close of business on the tenth calendar day after the rendition of the decision of the Planning Commission. If such date falls on a weekend or City holiday, then the deadline shall be extended until the next regular business day.

PASSED AND ADOPTED at a regular meeting of the Planning Commission of the City of Vallejo, State of California, on the 9th day of September 2026 by the following vote, to-wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
ANTHONY TAYLOR, CHAIRPERSON
City of Vallejo Planning Commission

Attest:

_____
Kristin Pollot, AICP, SECRETARY
City of Vallejo Planning Commission

Exhibits:
A. Conditions of Approval
B. Project Plans

EXHIBIT A

CONDITIONS OF APPROVAL

VARIANCE (PLN26-0039)
THE INSTALLATION OF A 12-FOOT-TALL STEEL SECURITY WALL ADJACENT TO THE NEW POLICE DISPATCH MODULAR BUILDINGS AT 111 AMADOR STREET (APN:0056-216-080)

A. PLANNING DIVISION

Pre-Building Permit

1. Prior to building permit issuance, submit a numbered list to the Planning Division with a written response on how each condition of approval (COA) contained in this report will be satisfied. The list should be submitted to the Project planner who will coordinate development of the Project. The approved COAs shall be included in the permit set after the cover sheet with each condition listed.

During Construction

2. Construction activities shall be managed in compliance with the following requirements:
    a. Site Watering. During the construction of a Project, all portions of the site shall be watered as necessary to reduce emissions of dust and other particulate matter, and all stockpiles shall be covered.
    b. Maintenance. Streets and sidewalks shall be made dirt free at the completion of construction.
    c. Noise. All construction and transport equipment shall be muffled in accordance with state and federal laws.
    d. Emissions. Construction and transport equipment shall be operated to minimize exhaust emissions. During construction, trucks and equipment should be running only when necessary.
    e. Hours of Operation. Grading and pile driving operations within ¼ mile of residential units shall be limited to between 8:00 am and 5:00 p.m. on weekdays to ensure compliance with the requirements for construction activity in Subsection 16.502.12.D.1., Maximum Noise Level for Temporary Construction Activity, or as otherwise restricted as part of an approval.
    f. Water Run-off. All water run-off from construction sites shall be controlled. During construction, trucks and equipment should be running only when necessary and shall comply with Chapter 12.41 of the Vallejo Municipal Code. Construction, demolition, and related loading/unloading activities that may generate noise shall be limited to the following: 7 a.m. and 6 p.m., Monday- Friday, Saturday 9 am- 6 pm. No construction is to occur on Sunday or federal holidays. Construction equipment noise levels shall not exceed the City's maximum allowable noise levels.

3. Project shall implement the Bay Area Air Quality Management District's (BAAQMD) Air District Basic Construction Mitigation Measures Recommended for All Projects (Best Management Practices [BMPs]), in addition to enhanced BMPs, given the proximity of sensitive receptors to the construction area, in order to control the proposed Project's fugitive dust emissions to a less-than significant level.

Fences and Walls

4. Fencing/Walls shall be continuously maintained with no sign of rust or disrepair. Any graffiti shall be removed within forty-eight hours of discovery by the property manager. (VMC Section 16.505.02 (B)).

General Requirements

5. Effective Date and Expiration. This approval shall become effective immediately following the appeal period of ten (10) calendar days, unless an appeal is filed. Pursuant to VMC Section 15.08.110(A), approval of this application shall automatically expire three years from the date of effectiveness, or September 19, 2028, unless rights are exercised or extended. If a permit is granted in conjunction with approval of new construction, the issuance of a Building Permit shall constitute the exercise of rights; provided, however, that, unless otherwise specified as a condition of Project approval, the permit shall expire if:
    a. The Building Permit expires;
    b. Final inspection is not completed, or Certificate of Occupancy is not issued within the time specified as a condition of Project approval; or
    c. The rights granted under the permit are not exercised within one year following the earliest to occur of: issuance of a Certificate of Occupancy, or if no Certificate of Occupancy is required, the last required final inspection for the new construction. (VMC Section 16.602.12(B))

6. The Planning and Development Services Director may approve a one-year extension of any permit or approval granted for a residential or non-residential Project under the Zoning Code upon receipt of a written application and fees received fifteen calendar days) before the expiration date with the required fee prior to expiration of the permit. (VMC Section 16.602.12 (C.1))

7. Project Authorization. The Project shall be constructed and operated in substantial conformity with the authorized use as described in the application materials, the Project description, and the approved plans, included as ***Attachment B*** of this approval, and as amended by the conditions of approval. Any additional uses or facilities beyond those approved herein, shall require a separate application. Any deviation from the Project description and/or approved plans requires review and written authorization from the Planning Manager.

8. Compliance with Other Requirements. The Project applicant shall be responsible for compliance with all other applicable federal, state, regional, and local laws/codes, requirements, regulations, and guidelines, including but not limited to, those imposed by the City's Building Division, Fire Department, Water Department, Public Works Department, Vallejo Flood and Wastewater District, and Department of Transportation, as applicable.

9. Utilities including, but not limited to, all electrical, telephone, cable television, fiber-optic cable, gas, water, sewer, irrigation/recycled water, and similar distribution lines providing direct service to this Project shall be installed underground within the site.

10. Indemnification. Applicant shall indemnify, hold harmless, and defend City, its officers, officials, directors, employees, agents, volunteers and affiliates and each of them from any and all claims, demands, causes of action, damages, costs, expenses, actual attorney's fees, applicant's fees, expert fees, losses or liability, in law or in equity, of every kind and nature whatsoever arising out of

or in connection with Applicant's operations, or any subcontractor's operations, to be performed under this agreement for Applicant's or subcontractor's tort negligence including active or passive, or strict negligence, including but not limited to personal injury including, but not limited to bodily injury, emotional injury, sickness or disease, or death to persons and/or damage to property of anyone, including loss of use thereof, caused or alleged to be caused by any act or omission of Applicant, or any subcontractor, or anyone directly or indirectly employed by any of them or anyone for the full period of time allowed by the law, regardless to any limitation by insurance, with the exception of the sole negligence or willful misconduct of the City. No modification of the Project, any application, permit, certification, condition, environmental determination, other approval, change in applicable laws and regulations, or change in processing methods shall alter the Applicant's indemnity obligation.

B. BUILDING DIVISION

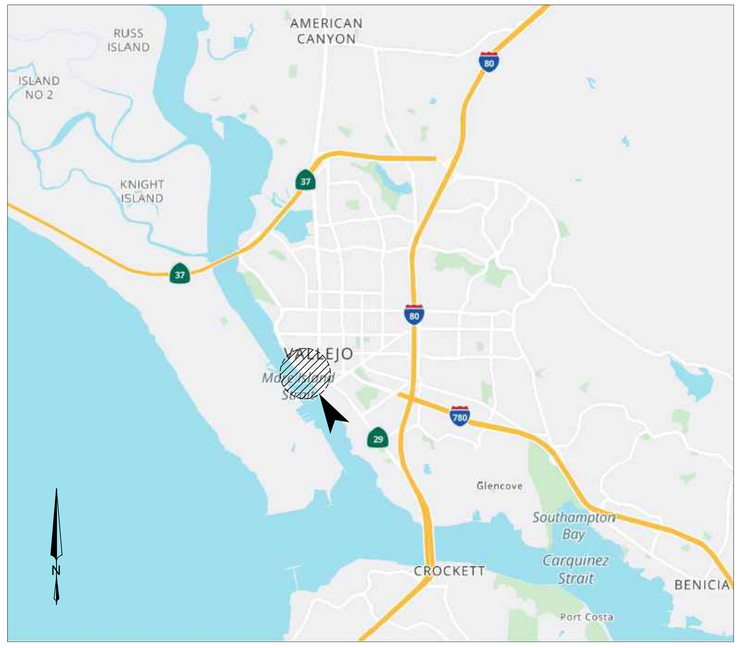
1. For any building permits request, plans and permits will be required for building, mechanical, plumbing, and electrical work per California Code of Regulations, Title 24 and applicable City Ordinance in effect at the time of the completed Building Permit application date and required fees shall be paid at the time of application.

CITY OF VALLEJO, CALIFORNIA

PUBLIC WORKS DEPARTMENT

PLANS FOR

VALLEJO POLICE DEPARTMENT DISPATCH SECURITY WALL



VICINITY MAP

LOCATION MAP

PROJECT DESCRIPTION

INSTALL A NEW STEEL SECURITY WALL AROUND THE EXISTING DISPATCH MODULAR BUILDING.

ADDRESS: 111 AMADOR ST, VALLEJO, CA 94590

ASSESSOR'S PARCEL NUMBER (APN): 0056-216-080

INDEX OF DRAWINGS

LEGEND

—— – – ——	PROPERTY BOUNDARY
– – – – – – – –	EXISTING FENCE (WROUGHT IRON/CHAIN-LINK)
▬▬▬▬	PROPOSED STEEL SECURITY WALL
C	EXISTING COMMUNICATION BOX
E	EXISTING ELECTRICAL BOX
○	EXISTING BOLLARD
♭	EXISTING SIGN
◎	EXISTING UTILITY MANHOLE
☼	EXISTING STREET LIGHT

ABBREVIATIONS

(E)	EXISTING
CA	CALIFORNIA
DWY	EXISTING DRIVEWAY
MUTCD	MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES
NTS	NOT TO SCALE

811 Know what's below. Call before you dig.

BY | REVISION | NO. | DATE

CITY OF VALLEJO
PUBLIC WORKS DEPARTMENT ENGINEERING

APPROVED: ON

CITY OF VALLEJO
VALLEJO POLICE DEPARTMENT SECURITY WALL
111 AMADOR STREET, VALLEJO, CALIFORNIA 94590
APN: 0056-216-080

TITLE SHEET

CITY PROJECT #

DESIGNED BY OA

DRAWN BY FL

CHECKED BY OA

DATE 08/03/2026

SCALE AS SHOWN

SHEET 1

T-1

OF 2 SHEET

DRAWING FILE #

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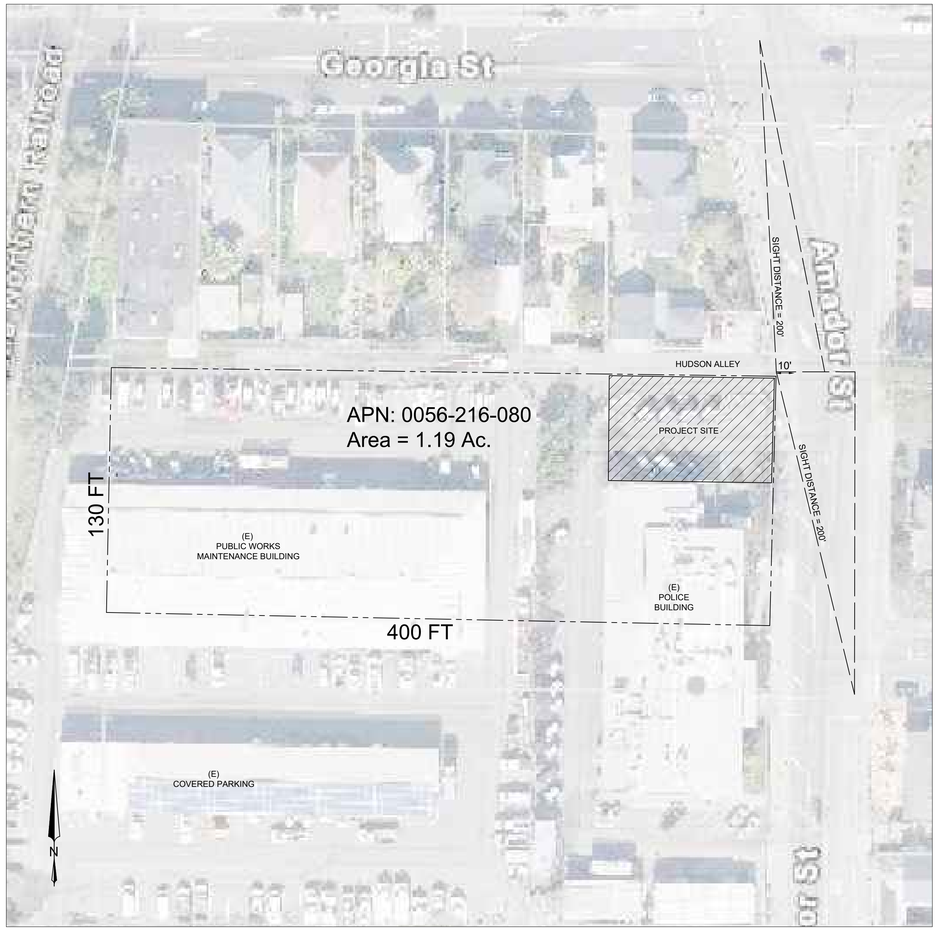
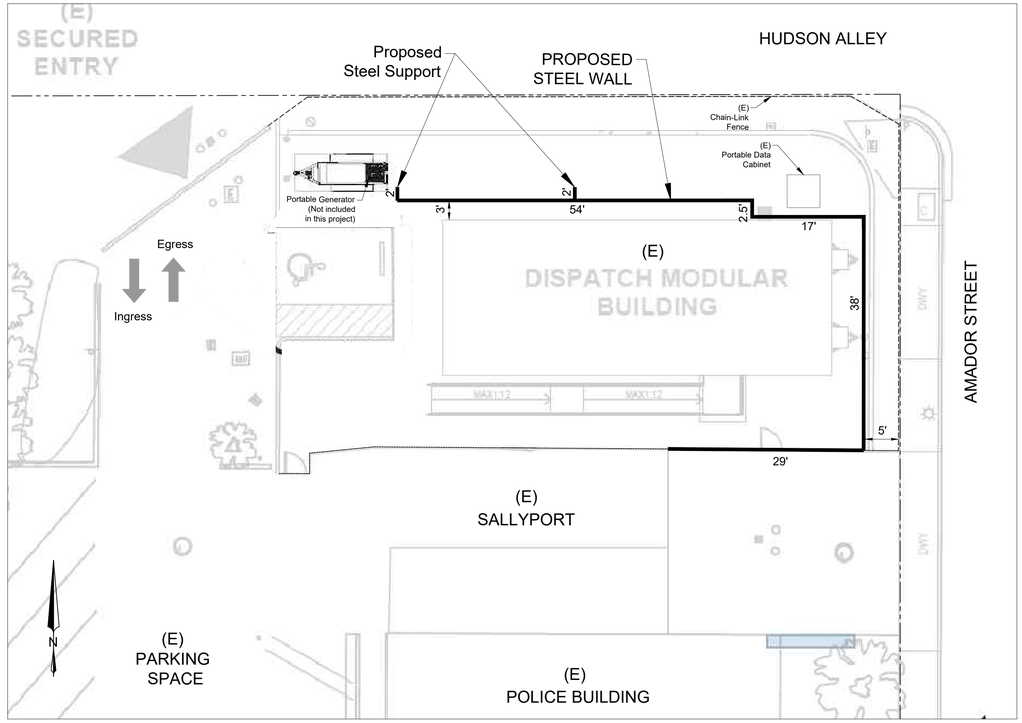


SITE MAP

(SCALE: NTS)



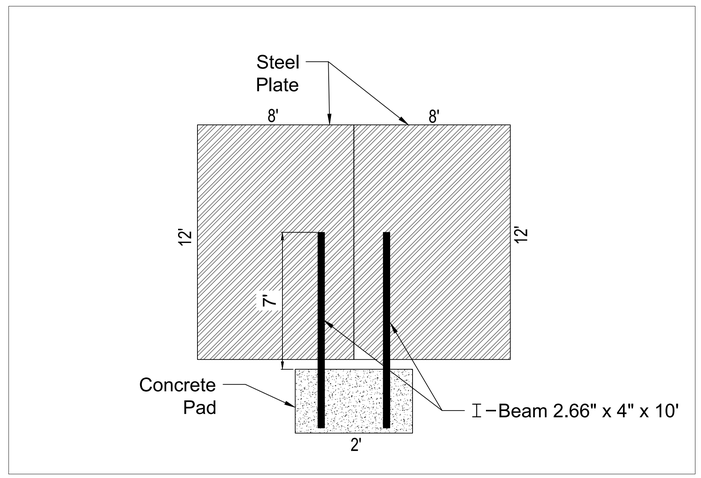
SITE PLAN

(SCALE: NTS)

NOTES:

1. PROPERTY LINE INFORMATION IS BASED ON REFERENCE DATA OBTAINED FROM THE CITY OF VALLEJO GIS AND THE SOLANO COUNTY ASSESSOR'S MAP AND IS INTENDED FOR REFERENCE PURPOSES ONLY.

2. SIGHT DISTANCE INFORMATION IS BASED ON TABLE 6B-2 OF CA MUTCD.



STEEL WALL DETAILS

(SCALE: NTS)

811
Know what's below.
Call before you dig.

BY	NO.	DATE	REVISION

CITY OF VALLEJO
PUBLIC WORKS DEPARTMENT ENGINEERING

APPROVED: ON

CITY OF VALLEJO
VALLEJO POLICE DEPARTMENT SECURITY WALL
111 AMADOR STREET, VALLEJO, CALIFORNIA 94590
APN: 0056-216-080

SITE PLAN AND DETAILS

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CITY PROJECT #	
DESIGNED BY	OA
DRAWN BY	FL
CHECKED BY	OA
DATE	08/03/2026
SCALE	AS SHOWN
SHEET	2
	S-1
OF	2 SHEET
DRAWING FILE #	

RESOLUTION NO. 24-061 N.C.

A RESOLUTION OF THE CITY COUNCIL OF VALLEJO (1) FINDING THE DISPATCH MODULAR BUILDING PROJECT EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA GUIDELINES SECTIONS 15303 (CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES) AND 15304 (MINOR ALTERATIONS TO LAND); (2) FINDING AND DETERMINING THAT IT IS IN THE BEST INTEREST OF THE CITY TO AWARD A CONSTRUCTION CONTRACT WITHOUT USING A FORMAL BIDDING PROCESS PURSUANT TO VALLEJO MUNICIPAL CODE SECTION 3.20.080.F; AND (3) APPROVING AND AWARDING A CONSTRUCTION CONTRACT TO WHITLEY MANUFACTURING CO. IN THE AMOUNT OF $485,849 FOR THE PROJECT

WHEREAS, on October 24, 2023, the City Council directed staff to move the Vallejo Police Department Emergency Dispatch Center into temporary modular units on the same site as the Vallejo Police Department Headquarters Building at 111 Amador Street; and

WHEREAS, subsequently, the City Council directed staff to look into alternate locations for the location of the Emergency Dispatch Center; and

WHEREAS, the plans and specifications for the Dispatch Modular Building Project have been prepared by the City of Vallejo Public Works Engineering Division under the direction of the City Engineer; and

WHEREAS, the modular buildings are deemed a California essential services building and must adhere to Risk Category IV standards; and

WHEREAS, time is of the essence to receive and install the buildings on site to match the arrival of new communication equipment; and

WHEREAS, in January 2024, the City's architect for the project, Indigo Hammond + Playle Architects, sent proposal packages to eight modular companies, requesting bid responses by April 1, 2024. Of the eight, three responded that they were unable to meet either the specifications or the timeline for completion (Pacific Mobile, Mobile Modular, and Meehleis Modular Buildings Inc.), three were non-responsive (Factory OS, Enviroplex, Modular Building Concepts), and two responded with almost the same price (Whitley Manufacturing Co. and ModTech Global Modular).

WHEREAS, Whitley Manufacturing Co. was the only vendor that could deliver the units by the beginning of September 2024, which meets the timeline for the delivery of the Motorola communication infrastructure that was purchased in 2023.

WHEREAS, due to the Emergency Dispatch Center relocation being identified as one of City Council's priorities, in order for timely delivery of these specialized Type 4 modular buildings, Staff recommends that Council find it in the best interest of the City to not follow formal bidding procedures, which would have delayed design, manufacturing and delivery of the modular buildings to 2025.

WHEREAS, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15303, projects consisting of the construction and location of fewer than four commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use, if not involving the use of significant amounts of hazardous substances, where all necessary public services and facilities are available, and the surrounding area is not environmentally sensitive are exempt from environmental review, provided none of the applicable exceptions listed in Guidelines Section 15300.2 apply; and

WHEREAS, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15304, projects that make minor temporary use of land having no or negligible effects on the environment are exempt from environmental review, provided none of the applicable exceptions listed in Guidelines Section 15300.2 apply.

NOW, THEREFORE, BE IT RESOLVED that the City Council hereby finds the project categorically exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303 because the project consists of the construction of two modular buildings that will be combined into one Dispatch Center measuring a total of 1,440 square feet which will be located on a site with a zoning designation of "Public and Semi-Public" and therefore appropriately zoned for such use. In addition, the project does not involve the use of significant amounts of hazardous substances, all necessary public services and facilities are available, and the surrounding area is not environmentally sensitive. In addition, none of the exceptions to the exemption listed in Guidelines Section 15300.2 apply—namely, there is no cumulative impact from successive projects in the same place over time; there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances; the project is not located near a scenic highway; the project site is not on the Cortese list of hazardous waste sites; and the project will not cause a substantial adverse change in the significance of a historical resource.

BE IT FURTHER RESOLVED that the City Council hereby finds the project categorically exempt from environmental review under CEQA pursuant to CEQA Guidelines Section 15304 (Minor Alterations to Land) because the project will make minor temporary use of land having no or negligible effects on the environment. None of the exceptions to this exemption listed in Guidelines Section 15300.2 apply—namely, there is no cumulative impact from successive projects in the same place over time; no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances; the project is not located near a scenic highway; the project site is not on the Cortese list of hazardous waste sites; and the project will not cause a substantial adverse change in the significance of a historical resource.

BE IT FURTHER RESOLVED that the City Council hereby finds that, in order for timely delivery of the specialized Type 4 modular buildings needed for the Project, staff recommends that the Council find it is in the best interest of the City to forego formal bidding procedures in this instance because the delay in selecting the ultimate relocation site coupled with the timing of the Motorolla contract results in insufficient time to undertake the formal competitive bidding process without resulting in significant further delay of the relocation of the Emergency Dispatch Center as well as the possibility of increases in costs associated with further delay of delivery and installation of the Motorolla equipment.

BE IT FURTHER RESOLVED that the City Council hereby approves and awards a Construction Contract for the Dispatch Modular Building Project to Whitley Manufacturing Co. in the amount of $485,849 for the total bid.

BE IT FURTHER RESOLVED that the City Manager is hereby authorized to sign an Agreement between the City of Vallejo and Whitley Manufacturing Co., with any modifications recommended by the City Attorney, and the City Clerk to attest the signing of that Agreement.

BE IT FURTHER RESOLVED that the City Manager, or their designee, is hereby authorized to execute future Contract Change Orders not to exceed the appropriated project budget.

Adopted by the City Council of the City of Vallejo at a regular meeting held on May 14, 2024, with the following vote:

AYES:	Mayor McConnell, Vice Mayor Loera-Diaz, Councilmembers Arriola, Bregenzer, Matulac, Palmares, and Verder-Aliga
NOES:	None
ABSENT:	None
ABSTAIN:	None

DocuSigned by:
ROBERT H. MCCONNELL
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ROBERT H. MCCONNELL, MAYOR

ATTEST:

DocuSigned by:
Dawn G. Abrahamson
1489DDA6695D425...
DAWN G. ABRAHAMSON, CITY CLERK