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STAFF REPORT

Date: November 12, 2025

To: Transportation Committee

From: TRPA Staff

Subject: Updates to the Transportation Project Impact Assessment Process (Code of Ordinances 65.2) and amendments to Chapter 7 of the Regional Plan Goals and Policies (Implementation Element), Development and Implementation Priorities 5.4 (DP. 5.4)

Summary and Staff Recommendation:
Staff will present proposed revisions to the transportation impact assessment process and the funding land use policy link of the Regional Plan (DP 5.4). The proposed updates to the impact assessment process are designed to provide applicants and planners with a more reliable and straightforward process for analyzing projects. The proposed amendments to DP 5.4 are designed to resolve ambiguity in the current policy and align the incentives with the vision and goals of the Regional Plan and the Regional Transportation Plan.

Required Motion:

In order to endorse the proposed direction, the Committee must make the following motion, based on the staff report:

1) A motion to direct staff to continue working with stakeholders to fully develop the outline in this staff report and its attachments.

An affirmative vote of a majority of the quorum present is required to take the requested action.

Background:
TRPA holds a unique planning authority that integrates land-use and transportation policy. To support attainment of the Transportation and Sustainable Communities threshold standard, TRPA adopted new guidelines for analyzing Vehicle Miles Traveled (VMT) impacts (Code of Ordinances 65.2). After four years of implementation, staff has identified opportunities to incorporate lessons learned and improve overall efficiency and effectiveness. The proposed modifications include several complementary elements intended to simplify project impact assessment, align incentives, and reduce automobile dependence.

The Regional Plan goal DP-5.4 links transportation funding to project impact analysis. Following Board direction from January 2024, TRPA identified the need to refine these policies. The 2025-2026 Agency Workplan highlighted updating DP-5.4 as a priority deliverable.

Proposed modifications to the project impact assessment process and DP-5.4 are outlined below and discussed in greater detail in the attachments.

Project Analysis

The project analysis includes two steps: 1) VMT calculation, and 2) Impact assessment.

1 VMT Calculation

Vehicle Miles Traveled (VMT) represents the total number of miles driven by all vehicles within a specific area and time period. Every project is required to assess its potential impact on regional VMT. A project's VMT impact on VMT is typically estimated based on two factors: 1) Trip Generation: the total number of trips traveling to or from the project, and 2) Trip Length: the average length of a trip to or from the property.

1.1 Trip generation

TRPA, like agencies around the country, uses the Institute of Transportation Engineers (ITE) Trip Generation Manual to evaluate transportation impacts of new development. While the ITE manual is widely used in planning, it is also known to overestimate trip generation, especially in urban, mixed-use, or transit-oriented areas.

Under the current system, applicants provide information, and adjustments are made on a project-by-project basis. This approach often introduces unnecessary complexity and extends review timelines. Much of the information provided is highly granular, beyond the level of detail appropriate for a regional planning agency. As a result, applicants frequently hire consultants to prepare impact analyses for relatively small projects, while staff must dedicate significant time to reviewing the submitted materials.

The proposed revisions address these issues by standardizing planning assumptions for all projects to use when estimating trip generation. This standardization would make the process faster, more predictable, and more consistent, allowing most projects to complete trip and VMT calculations in under 15 minutes.

The proposed revisions are detailed in Attachment A.

1.2 Simplified Impact Assessment Zones for Analyzing Trip Length

The current transportation impact assessment framework divides the region into 79 individual zones to analyze project-level impacts. These zones generally align with the traffic analysis zones used in the Tahoe travel demand model.

While this structure allows the framework to draw data directly from the Tahoe travel demand model, the large number of zones often results in small sample sizes. This complexity can be confusing to users and often results in inconsistent treatment between areas, creating outcomes that are poorly aligned with expectations. To improve clarity and consistency, staff are proposing a simplified set of impact assessment zones that draw from larger sample sizes to provide more consistent: Proposed impact assessment zones:

https://trpa.maps.arcgis.com/apps/mapviewer/index.html?webmap=f7931b85252b41939ec9bb3f80365e69

2 Project Impact Assessment

After a project's net change in VMT is calculated, staff evaluate whether the change constitutes a significant impact. The determination of significance involves two steps:

1. Screening: to identify projects that are unlikely to result in significant VMT impacts
2. Application of standards of significance: to determine whether impacts exceed established thresholds

2.1 Screening

The screening process streamlines and simplifies the analysis of smaller, less complex projects that are unlikely to have a significant impact on regional VMT. Projects that meet the screening criteria are required to disclose VMT impacts, pay the applicable mobility mitigation fee, and may proceed without further analysis.

The proposed modifications to the screening process include adjustments to the low-VMT project screen and additional screening for:

1. Screening for local serving retail and public service use projects
2. Screening for residential and tourist accommodation projects in town centers.

Additional details on the screening criteria are available in Attachment B.

2.2 Standards of significance.

No changes are proposed for the standards of significance.

Mobility Mitigation Fee

To maintain the mobility mitigation fee at the same level on a per-unit or per-project basis, the fee's unit rate must be adjusted in line with changes in trip rates used for project impact assessment. Under the proposed adjustment, the fee rate increases inversely to the reduction in trip rates. To account for the 43% reduction in trip rate generation, the proposed fee rate increases by 43% (Table X).

	Current	Proposed
Bed Base Uses	$ 207.13	$ 361.76
All Other Uses	$ 23.01	$ 40.19

On a project basis, the higher fee rate is offset by the reduced number of trips generated. The table below provides an example of how the fee rate change applies to a hotel project using the regional average trip length.

Hotel (ITE Code 310)				
	Trips	VMT	Fee rate	Unit Cost
Current	8.36	50.41	$ 207.13	$ 10,442
Proposed	4.79	28.86	$ 361.76	$ 10,442

Mobility Mitigation Fee Credit

Under current policy, after five years without active use or a permit application, a site's VMT "credit" expires, and any subsequent redevelopment is treated as a new project (Code 65.2.3.C). This structure, like policies in other jurisdictions, is intended to incentivize faster redevelopment.

Stakeholders suggested the policy is a barrier to redevelopment and that the agency consider ways to address ongoing blight in our communities. Staff have developed the following alternatives for the committee's consideration.

1) Extend the five-year credit period to 10 years
2) Extend to 10 years, with credit depreciation over the period
3) Extend to 10 years, with credit depreciation, and allow 50% credit after 10 years
4) Extend the five-year credit indefinitely in town centers, with no change outside of these areas.

Transportation Funding Policy

The Governing Board directed staff to revisit the transportation funding and land-use policies of DP-5.4 and DP-5.6 at its January and March 2024 meetings. Among the issues that have been raised related to the policy are:

a) not aligned with the "7-7-7" approach to augment transportation funding,
b) accounting for the variability in state and federal funding,
c) the impact of DP-5.6 on projects that reduce VMT per capita,
d) focus on penalties for not achieving goals, without rewards for achieving,
e) focus on funding rather than projects required to reduce VMT

The proposed framework would replace the funding and land use policy link of DP-5.4 and DP-5.6 with a framework that establishes incentives for adding transit service, expanding bicycle and pedestrian infrastructure, and increasing density and mix of uses. These three physical factors are associated with low VMT development.

Under the proposed framework, areas that augment transit service, add infrastructure, or increase density would see a corresponding increase in screening size. Areas that lose transit service, bike and pedestrian infrastructure, or experience a decrease in density, would see a corresponding decrease in project screening.

This approach creates a positive feedback loop that encourages further investment in areas that are likely to reduce VMT while discouraging development in areas with higher VMT.

Additional details on the proposed index are available in Attachment C.

Additional Information:

For questions regarding this agenda item, please contact Dan Segan, Chief Science and Policy Officer at (775) 589--5233 or dsegan@trpa.gov.

To submit a written public comment, email publiccomment@trpa.gov with the appropriate agenda item in the subject line. Written comments received by 4 p.m. the day before a scheduled public meeting will be distributed and posted to the TRPA website before the meeting begins. TRPA does not guarantee written comments received after 4 p.m. the day before a meeting will be distributed and posted in time for the meeting.

Attachments:

A. Tahoe Trip Generation
B. Proposed Modifications to Project Screening
C. Mobility Index Background

Attachment A

Tahoe Trip Generation

Project-Based VMT Assessment

1. Identify the ITE land use type for the project and the Tahoe adjusted trip rate for the project.
2. Use the ITE rate and project size to determine the total number of trips.
3. Trip Generation Adjustments – Identify and apply any appropriate adjustments to the total number of trips identified in step 2, consistent with the guidance below, to determine the total number of trips for the project
    a. Pass-by trips - Pass-by trips are vehicle trips that are already on the roadway network and make a stop at a development (such as a gas station, coffee shop, or fast-food restaurant) as part of an existing trip, without creating a new or diverted trip onto the network. A standardized set of pass-by rates will be applied by land use type. The rates will be drawn from the published rates in the Pass-By Data and Rate Tables Appendix of the 11th Edition[1]. The Tahoe adjusted trip rate for the type will incorporate the published pass-by rate. No pass-by reductions are appropriate for residential, tourist accommodations, recreation, or public service uses.
    b. Annualization factor - For commercial and recreation projects that will not be operational year-round, the project-generated VMT can be adjusted by dividing the number of days the project is operational by the total number of days in the year. As a general rule, if an operational detail is not recorded on the deed, it should generally not be considered within the impact assessment process. No additional adjustment is necessary for residential or other overnight lodging types.
    c. Mode share-based trip adjustments - Mode share-based trip adjustments refer to the reductions to the number of auto trips generated by a land-use because of trips taken via another mode (eg. walking, biking, etc). The total number of trips is scaled based on the observed number of trips in Tahoe today, so additional mode share-based adjustments are not necessary or appropriate.
4. Identify the Zone for the project and the zone average trip length.
5. Multiply the total number of trips from step 3 by the zone average trip length from step 4 to calculate the total project VMT.

[1] https://www.ite.org/ITEORG/assets/File/Trip%20Generation%20Appendices%20PUBLISHED/Appendices/Pass-By%20Tables%20-%20Trip%20Generation%20Manual%2011th%20Ed.xlsx

Adjusted Tahoe Trip Rates

The ITE Trip Generation Manual is a reference guide published by the Institute of Transportation Engineers (ITE) that provides empirical data on vehicle trip generation rates for a wide range of land use types. It is widely used by transportation planners, engineers, and developers to estimate the number of trips a development will generate.

While the ITE manual is widely used in planning, it is also known to overestimate trip generation, especially in urban, mixed-use, or transit-oriented areas. Several factors contribute to the overestimation, including:

1. Suburban, Auto-Oriented Data Bias - ITE rates are derived from studies that favor standalone developments in suburban or low-density locations with limited access to transit, biking, or walking. These sites tend to have higher car dependence, leading to more observed vehicle trips than would occur in denser, more walkable contexts.

2. Single-Use Development Focus - Many trip rates are based on single land uses (e.g., a supermarket or office) analyzed in isolation. In mixed-use developments, internal capture (e.g., walking from an office to a retail area) reduces vehicle trips; however, ITE rates don't always account for these synergies.

3. Mode Split - The manual generally does not differentiate between trips by car, transit, bike, or walking—it assumes trips are by car unless otherwise stated. In reality, especially where sidewalks and bike paths are available and connected to amenities, a significant share of trips may occur by non-auto modes.

Due to the known bias, ITE rates are often adjusted by transportation engineers and planners during the planning process.

Multiple lines of evidence, including the Tahoe Travel Demand Model, Streetlight, and Replica, indicate that approximately 200,000 automobile trips occur daily in the Tahoe region. The most recent update of the travel demand model suggested that there were 208,557 daily automobile trips and 417,114 trips ends in the Tahoe region. In 2024, the Streetlight estimated annual average daily trip ends was 419,539.

Based on the total amount of development in the Tahoe region and standard ITE trip generation rates, the estimated number of daily trip ends in Tahoe would be 728,495 (Table 1).

	#	ITE	Rate	Pass by	Trips
Single Family (units)	39,006	210	9.44		368,217
Multi-family (units)	9,885	220	7.32		72,358
CFA (sq. ft)	6,477,943	820	37.75	24%	195,634
TAU (units)	11039	310	8.36		92,286
Total					728,495

Table 1. Total number of estimated trips in the Tahoe region based on ITE rates.

Comparing the 417,114 trip ends in the Tahoe Region with the ITE's estimated 728,495 trip ends, the number of trip ends in the region is 57.3% of the estimated number by ITE.

This factor can be applied to all ITE trip rates to derive Tahoe-specific trip generation factors for each land use.

Use	ITE Code	Trip Rate (weekday)	TRPA Rate
Single-Family Detached	210	9.44	5.41
Multi-Family (low-rise, one or two levels)	220	7.32	4.19
Senior Adult Housing – Attached	252	3.7	2.12
Congregate Care Facility (Residential Care)	253	2.02	1.16

Table 2. ITE trip rates adjusted for Tahoe.

The ITE manual provides trip rates for a suite of development types and is the basis for analyzing travel impacts for most jurisdictions. The application of factored ITE trip rates for planning in Tahoe leverages the wealth of knowledge and information in the ITE manual and places that within a regionally appropriate context. The approach provides a rapid project assessment process for any land use type in the ITE manual.

The approach posits that the ITE trip generation ratios for different uses are the same in Tahoe as elsewhere, but the number of trips for each type is region-specific. For example, the ITE manual suggests that a single-family residential unit generates 29% more trips (9.44/ day) than a low-rise multiple-family unit (7.32/day) (Table 1). The proposed approach supposes that multi-family units in Tahoe will produce fewer trips than single-family units and that the reduction in Tahoe is proportional to that observed elsewhere.

Appendix A. Sample Tahoe Adjusted Trip Rates

		Use	ITE Code	Rate	Tahoe Rate	Variable
	Residential					
1	TRPA10	Single-Family Detached	210	9.44	5.41	DU
2	TRPA11	Multi-Family (low-rise, one or two levels)	220	7.32	4.19	DU
3	TRPA17	Senior Adult Housing – Attached	252	3.7	2.12	DU
4	TRPA18	Congregate Care Facility (Residential Care)	253	2.02	1.16	DU
	Tourist Accommodation					
5	TRPA20	Hotel	310	8.36	4.79	Units
6	TRPA23	Motel	320	3.35	1.92	Units
7	TRPA14	Timeshare	265	9.73	5.57	Units
	Commercial					
8	LA11	General retail	820	37.75	21.61	KSF
9	TRPA101	Furniture Store	890	6.3	3.61	KSF
10	TRPA99	Pharmacy/Drugstore	880	90.08	51.58	KSF
11	TRPA92	Supermarket	850	106.78	61.14	KSF
12	TRPA102	Walk-In Bank	911	12.13	6.95	NA
13	TRPA107	High Turnover Sit-Down Restaurant (<1 hr. turnover)	932	112.18	64.23	KSF
14	TRPA108	Fast Food Restaurant	933	346.23	198.24	KSF
15	TRPA106	Quality Restaurant (>1 hr. turnover)	931	83.84	48.00	KSF
16	TRPA103	Drinking Place	925	11.36	6.50	KSF
17	TRPA89	Auto Parts and Service Center	943	16.28	9.32	KSF
18	TRPA77	Building Materials/Lumber	812	18.05	10.33	KSF
19	TRPA79	Free-Standing Discount Store	815	53.12	30.41	KSF
20	TRPA63	General Office Building (GFA of more than 5,000 sf)	710	9.74	5.58	KSF

		Use	ITE Code	Rate	Tahoe Rate	Variable
21	TRPA67	Medical –Dental Office Building	720	34.8	19.93	KSF
22	LA26	Light industrial	110	4.96	2.84	KSF
23	LA28	Warehouse	151	1.51	0.86	KSF
26	TRPA86	Automobile Sales (New	840	27.84	15.94	KSF
	Recreation					
30	TRPA31	Public Park	411	0.78	0.45	Acres
31	TRPA32	Developed Campground/RV Park	416	12.57	7.20	Sites
32	TRPA33	Marina	420	2.41	1.38	Berths
33	TRPA34	Golf Course	430	3.74	2.14	Acres
34	TRPA35	Bowling Alley	437	24.07	13.78	KSF
35	TRPA36	Movie Theater (traditional)	444	78.09	44.71	KSF
36	TRPA41	Health and Fitness Club	492	38.97	22.31	KSF
37	TRPA43	Recreational Community Center	495	28.82	16.50	KSF
	Public Services					
38	TRPA52	University/College	550	26.04	14.91	KSF
39	TRPA46	High School	530	14.07	8.06	KSF
40	TRPA45	Middle School/Junior High School	522	20.17	11.55	KSF
41	TRPA44	Elementary School	520	19.52	11.18	KSF
42	TRPA48	Private School (K-12)	536	42.34	24.24	KSF
43	TRPA53	Church	560	9.9	5.67	KSF
44	TRPA56	Daycare Center	565	47.62	27.27	KSF
45	TRPA58	Library	590	72.05	41.25	KSF
46	TRPA59	Hospital	610	10.723	6.14	KSF

Attachment B

Proposed Modifications to Project Screening

SCREENING

Screening simplifies analysis of smaller, less complex projects that are unlikely to have a significant impact on regional Vehicle Miles Traveled (VMT). Projects that meet the screening criteria disclose VMT impacts, pay the mitigation fee, and move forward.

Screening streamlines VMT impact assessment by expediting processing for smaller projects (e.g, those expected to have a minor impact on transportation) and projects expected to reduce regional VMT per capita. Non-screened projects are generally large enough to mitigate VMT at the project level through the implementation of mitigation strategies and the payment of fees that support regional VMT mitigations. Projects that are screened most effectively mitigate their impacts by contributing to regional mitigation through the mobility mitigation fee.

LOW VMT PROJECTS

Projects generating less than 744 VMT in centers and projects generating less than 409 VMT in all other areas.

Examples of project sizes that would be screened under the low VMT criteria are included in Appendix B.

DEED-RESTRICTED HOUSING

Deed-restricted affordable, moderate-, or achievable-income levels in the Residential Bonus Units area.

- **Affordable:** Deed-restricted for persons whose income is no more than 80 percent of the county median income.[2]
- **Moderate:** Deed-restricted for persons whose income is no more than 120 percent of the county median income. [3]
- **Achievable:** Deed-restricted for persons whose income is no more than the county's achievable median income percentage[4].

TRANSPORTATION PROJECTS

Transit and active transportation projects, other than mobility hubs, are exempt from further VMT analysis. Active transportation projects include enhancements to the pedestrian and bicycle network. TRPA evaluates mobility hubs on a case-by-case basis for screening purposes.

TRPA also recognizes that certain other transportation projects may not result in a significant increase in VMT, including those projects identified by the California Governor's Office of Planning and Research in *Technical Advisory: On Evaluating Transportation Impacts in CEQA* (December 2018), which are listed here:

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity
- Roadside safety devices or hardware installation such as median barriers and guardrails

[2] See definition for "Affordable Housing" in Section 90.2 of the TRPA Code of Ordinances.
[3] See definition for "Moderate Housing" in Section 90.2 of the TRPA Code of Ordinances.
[4] Determined as specified in the definition for "Achievable Housing" in Section 90.2 of the TRPA Code of Ordinances.

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

PROJECTS FULLY ANALYZED IN AN AREA PLAN

Projects that have been fully analyzed in a conforming TRPA area plan are exempt from further analysis. To be considered under this screening criterion, a project must meet all of the following requirements:

- The project must have been specifically described in the project description for the area plan's environmental document (IEC, EA, or EIS).

- The project's impacts must have been fully analyzed in accordance with these guidelines in the area plan's environmental document.
- The project must incorporate the mitigation measures described in the area plan's environmental document.

LOCALLY SERVING RETAIL & PUBLIC FACILITIES

Public facilities that serve the local community or those intended for passive use may be presumed to have a less than significant impact, unless there is substantial evidence to the contrary. These do not include facilities or uses that would attract users from outside the vicinity of the use and are generally less than 10,000 sq ft in size. The following are examples of locally serving facilities and uses:

- Schools
- Daycares
- Libraries
- Post offices
- Local health/medical clinics
- Houses of worship
- Law enforcement and fire facilities
- Open space preserves, Local parks, trailheads
- Government offices
- Communication and utility buildings
- Water and sanitation buildings
- Waste management buildings
- General retail
- Grocery store
- Restaurant or bar
- Laundry or dry cleaners
- Personal services (barber or salon)
- Bank or financial services
- Gym, health club, fitness studio

Examples from other jurisdictions are included in Attachment A.

TOWN CENTERS

Residential, tourist accommodation projects within town centers, or retail projects less than 20,000 square feet. Projects screened within town centers will be required to complete the active transportation checklist[5] and work with TRPA staff to design a project that promotes access and connection with the existing infrastructure. TRPA town centers are designated areas for compact, mixed-use development and redevelopment that combine residential and commercial uses to create more sustainable and less auto-dependent communities. The characteristics of town centers are such that Residential, tourist accommodation projects may be presumed to have a less than significant impact, unless there is substantial evidence to the contrary.

[5] Active Transportation Plan (ATP) checklist - https://www.trpa.gov/wp-content/uploads/documents/ATP-Checklist-Fillable.pdf

MIXED-USE PROJECTS

For the purposes of screening, each element of the mixed-use project is treated independently. It is possible for some of the mixed-use project's land uses to be screened out, while others may require further analysis. Four element categories are considered 1) residential, 2) tourist accommodation, 3) commercial, and 4) recreation.

A project that includes both affordable and market-rate housing may exclude VMT from the affordable housing component for the purpose of screening.

Appendix A

Example small project and locally serving screening criteria from other jurisdictions.

Jurisdiction	Locally serving	Small Project	Reference
Berkeley	Locally Serving Public Facility: Locally serving public facilities generally encompass government, civic, cultural, health, and infrastructure uses which contribute to and support community needs and mostly generate trips within the local area. Locally serving public facilities include, but are not limited to, public schools, passive parks (parks designed for use in an informal way and typically less developed), libraries, community centers, police stations, fire stations, and public utilities	Projects defined as generating 836 daily VMT or less. Based on recent data from the California Household Travel Survey, this level of VMT would equate to 20 units of residential use or up to 10,000 square feet of non-residential use3	https://berkeleyca.gov/sites/default/files/2022-02/VMT-Criteria-and-Thresholds.pdf
Los Angeles (City / LADOT)	If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?17	T-2.1-1: Would the land use project11 generate a net increase of 250 or more daily vehicle trips	https://ladot.lacity.gov/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf
Monterey (City)	resumed to cause a less-than-significant impact: § No single store on-site exceeds 50,000 square feet § Project is local-serving as determined by the City of Monterey	Project generation is less than 110 trips per day	https://files.monterey.gov/Document-Center/Departments/Community-Development/Planning/Land-Use-Plans-Regulations-Studies/VMT/Reso-21-027-VMT-Policy.pdf?t=20250930122836&t=20250930122836
Pasadena (City)		• Project proposes 50 or more net new residential dwelling units • Project proposes 50,000 or more net new non-residential square fee	City of Pasadena Transportation Impact Analysis / TIA Guidelines (city TIA PDF). (City of Pasadena)

Placer County	Local-Serving Non-Residential Development: Defined as projects consisting of local-serving non-residential uses, unless substantial evidence indicates the project wouldgenerate a potentially significant level of VMT. Local-serving uses in western PlacerCounty are generally less than 50,000 square feet; however, substantial evidencemay be used to establish whether a project over that size is local-serving. Local-serving uses in eastern Placer County are generally less than 20,000 square feetexcept for grocery stores and medical uses which are generally less than 40,000square feet. Examples of local-serving uses include:▪ General retail▪ Grocery store▪ Restaurant or bar▪ Laundry or dry cleaners▪ Personal services (barber orsalon)▪ Bank or financial services▪ Medical or dental services▪ Gym, health club, fitnessstudio▪ Public schools orcommunity college▪ Childcare center▪ House of worship▪ Library▪ Civic center or communitycenter▪ Police or fire station▪ Government support facility▪ Community park▪ Post office▪ Utility facilities (water, sewer,communication, etc.)	Defined as a project that generates 110 average daily vehicle trips or880 daily VMT or fewer in western Placer County or 1425 VMT or fewer in easternPlacer County on a typical day.The types of projects that generate under 880/1425 daily VMT in western and easternPlacer County respectively, based on data from the Institute of TransportationEngineers (ITE) Trip Generation Manual 5 and Placer County trip length data, includethe following:▪ 17 or fewer single family dwelling units▪ 22 or fewer multi-family dwelling units▪ 10,000 square feet or less of office uses▪ 22,200 square feet or less of light industrial uses▪ 63,200 square feet or less of warehouse uses	

Riverside	Presumed to cause a less-than-significant impact:• No single store on-site exceeds 50,000 SF; and• Project is local-serving as determined by the TransportationDepartment	Presumed to cause a less-than-significant impact:• Single Family Housing projects less than or equal to 110Dwelling Units; or• Multi Family (low rise) Housing projects less than or equal to147 Dwelling Units; or• Multi Family (mid-rise) Housing projects less than or equal to194 Dwelling Units; or• General Office Building with area less than or equal to 165,000SF; or• Retail buildings with area less than or equal to 60,000 SF; or• Warehouse (unrefrigerated) buildings with area less than orequal to 208,000 SF; or• General Light Industrial buildings with area less than or equal to179,000 SF• Project GHG emissions less than 3,000 Metric Tons of CarbonDioxide Equivalent (MTCO2e) as determined by a methodologyacceptable to the Transportation Department; or• Unless specified above, project trip generation is less than 110trips per day per the ITE Manual or other acceptable sourcedetermined by Riverside County	https://trans.rctlma.org/sites/g/files/aldnop401/files/migrated/Portals-7-2020-12-15-20--20Transportation-20Analysis-20Guidelines.pdf
San Diego (County & City)	Following guidance provided by OPR, locally serving retail/service projects less than 50,000 square feetmay be presumed to have a less than significant impact absent substantial evidence to the contrary. Localserving retail/service generally improves the convenience of shopping close to home and has the effect ofreducing vehicle travel.	Following guidance provided by OPR, projects generating less than 110 daily vehicle trips (trips are based on the number of vehicle trips calculated using appropriate trip generation rates with any alternative modes/location-based adjustments are applied) may be presumed to have a less than significant impactabsent substantial evidence to the contrary	https://www.sandiegocounty.gov/content/dam/sdc/pds/SB743/Transportation%20Study%20Guide%20-%20FINAL%20-%20September%202022%20%20-%20%20Updated%20Maps.pdf

San José (City)	Retail projects of 100,000 square feet of total gross floor area of less without drive-through	• Office projects of 10,000 square feet of gross floor area or less; • Industrial projects of 30,000 square feet of gross floor area or less; • Single-family detached residential projects of 15 or fewer units; • Single-family attached or multi-family residential projects of 25 or fewer units; • Hotel or motel projects of 100 or fewer rooms	https://www.sanjoseca.gov/your-government/departments-offices/transportation/policies/vehicle-miles-traveled-metric
Santa Cruz County	Expected to cause a less-than-significant impact: § No single store on-site exceeds 50,000 square feet. § Project is local serving as determined by the County of Santa Cruz	§ Project trip generation is less than 110 net new trips per day.	https://cdi.santacruzcountyca.gov/Portals/35/CDI/UnifiedPermitCenter/EnvironmentalPlanning/VMT/SantaCruzCounty_VMTGuidelines_2025.pdf
OPR	By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT	Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day19 generally may be assumed to cause a less-than-significant transportation impact.	https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Appendix B

Residential / Hotel Project Size that would screen under the low VMT project criteria

	Screening Size for Projects	
	Residential (units)	Hotel (units)
Town Centers		
Zone 1 - City of South Lake Tahoe	30	34
Zone 1 - Douglas	29	33
Zone 1 - El Dorado	20	22
Zone 1 - Placer	19	21
Zone 1 - Washoe	27	31
Outside Centers		
Zone 1 - City of South Lake Tahoe	16	19
Zone 1 - Douglas	16	18
Zone 1 - El Dorado	11	12
Zone 1 - Placer	10	12
Zone 1 - Washoe	15	17
Zone 2 - City of South Lake Tahoe	15	17
Zone 2 - Douglas	11	13
Zone 2 - El Dorado	11	12
Zone 2 - Placer	10	11
Zone 2 - Washoe	13	14
Zone 3 - Douglas	8	9
Zone 3 - El Dorado	10	11
Zone 3 - Placer	9	10
Zone 3 - Washoe	10	11

Attachment C

Mobility Index Background

Mobility Index

The Mobility Index is a composite measure that quantifies the extent to which transportation infrastructure and land use support low VMT development. Higher index values indicate areas with greater support for walking, biking, and transit use. Lower values indicate greater dependence on the automobile. The index integrates physical attributes across three dimensions, including:

- Bike and Pedestrian Infrastructure and Safety: Quality, connectivity, and protection of facilities such as sidewalks, crosswalks, trails, and bikeways, along with safety indicators such as crash rates and traffic calming features.
- Transit Service: Frequency, coverage, and proximity of public transportation options, including micro transit.
- Density of Services and Population: Concentration of destinations such as jobs, and retail, as well as residential and employment density, which together support shorter trips and more non-automobile travel.

By combining these factors, the index provides a single metric representing how conducive an area is to active and sustainable transportation. Higher scores indicate environments where residents and visitors can walk, bike, and use transit more safely and conveniently to reach their daily destinations. Lower scores indicate areas where residents and visitors are more reliant on automobiles. The data to inform the index is drawn from sources TRPA and its partners already compile.

The index can be applied in multiple ways. It can be used to track changes over time and the extent to which the Regional Transportation Plan and the Regional Plan are being realized. The index could also be used by local planners to identify which elements an area is doing well on and which require additional attention. For example, areas that score well on transit and active transportation but low density could focus more concentrated development so that more people have the opportunity to take advantage of the transportation opportunities of the area. Within the proposed framework of DP5, the score is tied to the screening level. Where scores go up, the screening size for the area increases. Where score decrease, the screening size also decreases.

Index working draft: https://trpa-agency.github.io/Playground/PIA_Index.html

To simplify analysis and improve interpretability, the index is developed from three sub-indices representing the key categories of interest: Transit Service, Active Transportation Infrastructure, and Density. Each sub-index was generated using ESRI's Create Composite Index spatial analysis tool, with scores normalized using a min–max scaling approach. The data were aggregated to 15-acre hexagonal bins, each encompassing roughly 30 half-acre parcels—a scale previously shown to yield meaningful insights. This level of aggregation highlights spatial patterns effectively while remaining broad enough to support clear, basin-wide mapping and analysis. Additional detail about the variables and the methodology used to calculate them is described in the table below.

Category	Variable	Metric	Weighting within Category	Comments
Transit Service	Bus Service	Within a ½ mile walk of a transit stop (1 or 0)	1	This will be refined by adding service frequency to create a more nuanced value that captures quality of service as well.
Transit Service	Micro-Transit Service	In a micro transit service zone (1 or 0)	0.5	This was considered less important than standard bus service.
Active Transportation	Bike Paths and Sidewalks	Total length of class 1 bike paths and sidewalks within 500m of the middle of each hexagon	2	
Active Transportation	Intersection Stress	Distance-weighted score of the nearest 5 intersections based on our Bike Level of Traffic Stress (BLTS) study	0.5	This is intended to capture the experience of walking or biking in the area.
Active Transportation	Road Stress	Length-weighted average BLTS score for road segments within 500m of the center of the hexagon	0.5	This is intended to capture the experience of walking or biking in the area.
Density	Residential Unit Density	Total number of residential units in the hexagon and all adjacent hexagons	1	Including adjacent hexagons helped produce a smoother gradient of density.
Density	Tourist Accommodation Units	Total number of Tourist Accommodation Units in the hexagon and all adjacent hexagons	1	Including adjacent hexagons helped produce a smoother gradient of density.
Density	Commercial Square Feet	Total CFA in the hexagon and all adjacent hexagons	0.5	CFA may not be the best way to capture density; exploring options such as the number of employees.
Density	# of Commercial Properties	Total number of commercial properties in the hexagon and all adjacent hexagons	0.5	The number of businesses also seemed relevant to density.