

PROJECT IMPACT ASSESSMENT (PIA)

Summary of Procedural Changes

May 11, 2021

k K

Environmental Threshold

A new environmental threshold has been established under the category of *Transportation and Sustainable Communities*:

"Reduce Annual Daily Average VMT per Capita by 6.8% from 12.48, the 2018 baseline, to 11.63 in 2045."

This replaces the old Air Quality threshold for nitrate deposition which was based on total vehicle miles travelled (VMT).

To get to a 6.8 percent reduction in per capita VMT, we have had to make changes to Regional Plan policies and Code of Ordinances standards. These include:

- Updating the way we assess transportation-related impacts
- Replacing the air quality mitigation fee with a mobility mitigation fee
- Eliminating references to Level of Service
- Replacing vehicle trip references in the Code with the rough equivalent in VMT

Approach and Procedures for Assessing Transportation Impacts

Traffic-related impacts will no longer be based on Level of Service (LOS) and Daily Vehicle Trip Ends (DVTE). They will be assessed based on the amount of VMT being generated.

$$\text{VMT} = \text{DVTE} \times \text{Trip Length}$$

DVTE is determined by consulting the ITE Trip Generation Manual.

Trip Length is based on average trip length for a given location. A new GIS map establishes 79 Project Impact Assessment (PIA) Zones throughout the region, which provide the base data for trip lengths.

Because we are using VMT in lieu of DVTE, location is a major factor. Switching to VMT recognizes that location better captures the impact of transportation because it takes driving distance into account.

For example, a home on Ski Run Blvd in South Lake Tahoe may generate half as much VMT as a similar home on South Upper Truckee Road, where trip lengths are twice as long. Under our previous analytical framework, we would have considered the impacts of these two homes to be the same.

The PIA Tool

The PIA Tool, https://trpa.shinyapps.io/PIA_Tool/, can be used to calculate a project's generated VMT. The tool will allow a user to input the following information:

- Project type
- Project size (sqft / units)
- Project location

Based on this information, the PIA tool will calculate:

- VMT generated
- Standard of Significance
(See Page 3 for more info)
- Amount of VMT mitigation required
 - Mobility mitigation fee

The user can then select from a menu of mitigation options which will show a corresponding reduction in VMT generated.

Ultimately, the tool will allow the user to generate a report that lists the various calculations and the selected mitigation measures, which will become conditions of approval.

Table 1: Project Impact Analysis Changes		
Feature	Formerly	Now
Unit of Measure	Daily Vehicle Trip Ends (DVTE)	Vehicle Miles Travelled (VMT)
Standard of Significance for Transportation Impacts	No new unmitigated VMT ⁽¹⁾ and Worsened Level of Service (LOS)	See Table 2 for VMT standards. LOS no longer evaluated by TRPA
Type of Analysis	Traffic Study	Project Impact Analysis ⁽²⁾
Mitigation Fee	Air Quality Mitigation Fee	Mobility Mitigation Fee
Mitigation Fee Calculation	Based on DVTE	Based on VMT
Dispersal of Mitigation Fee	Water quality, air quality, and transportation projects	VMT-reducing projects

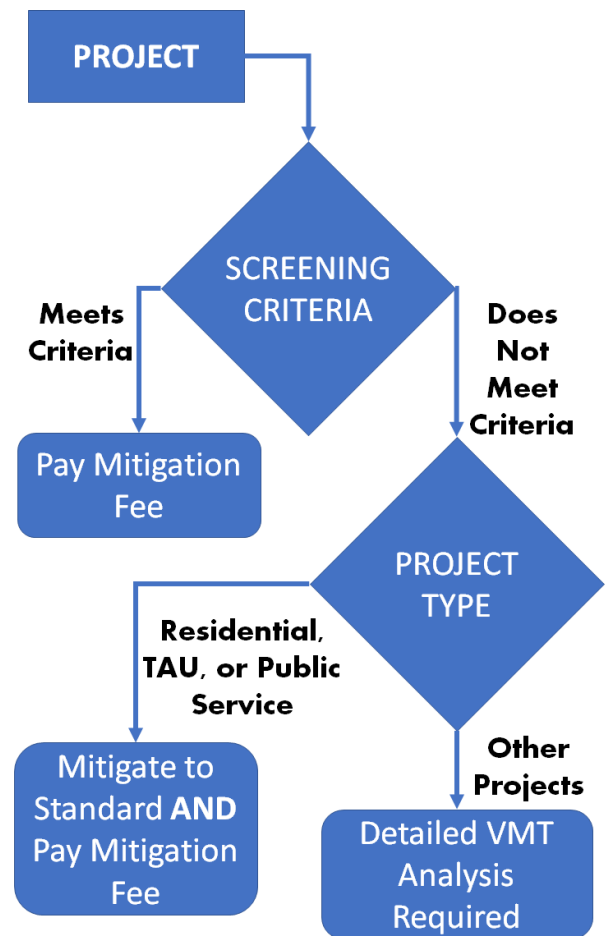
(1) If VMT Threshold is not in attainment.

(2) Some projects will require a more detailed VMT analysis.

The Process

- (1) The applicant enters project information into the PIA tool.
- (2) The tool determines if a project is **screened** from further analysis. Screened projects will pay the Mobility Mitigation Fee, except for deed restricted affordable housing; analysis is then complete.
- (3) For non-screened residential, tourist accommodation, and public service projects, the PIA tool will determine the VMT generated, the amount of the fee, and the amount of required mitigation.
 - If the project meets the Standard of Significance (Table 2) by land use type, the applicant pays the mobility mitigation fee;
 - If the project does not meet the Standard of Significance, the applicant pays the mobility mitigation fee AND does more thorough project-level mitigations. The tool will determine the amount of mitigation needed.

Figure 1: Process Flow Chart



Note: The tool cannot be used for commercial, recreation, and other unique projects beyond the initial screening. See Detailed Analysis below.

- (4) The applicant can then select from a menu of mitigation measures. The amount of VMT generated will be reduced accordingly.
- (5) The tool will then create a report showing the VMT and fee calculations, selected mitigation measures, and whether the standard of significance is met. This report would be submitted with the application.

Detailed VMT Analysis

Detailed VMT analysis is required for non-screened commercial, recreation, and other projects. Additionally, any applicant may choose to have a detailed VMT analysis if they prefer this to using the PIA tool.

Non-screened projects that are required to or choose to do a detailed VMT analysis will be directed by the PIA tool to the Transportation Planning Division for review.

Screened Projects

Certain classes of projects are screened from project impact analysis and do not need to mitigate below the Standard of Significance. These include the following:

- (1) 100% deed-restricted affordable, moderate, and achievable housing projects that are located in an area eligible for residential bonus units.
- (2) Projects generating low amounts of VMT
 - a. **1,300 VMT** within Town Centers and within ½ mile of Town Centers

This is roughly equivalent to 200 DVTE when using the average trip length.

- b. **715 VMT** everywhere else.

This is roughly equivalent to 110 DVTE when using the average trip length.

- (3) Active, safety, and other transportation projects that do not create new VMT, except for mobility hubs which will be evaluated on a case-by-case basis.
- (4) Projects fully analyzed as part of an area plan according to the new PIA process.

While these projects are excluded from further analysis, all but transportation and deed-restricted affordable housing projects will still pay the Mobility Mitigation Fee.

Standards of Significance

Standards of Significance define expectations for a non-screened project based on its land use type. All non-screened projects must mitigate their impact to at or below the Standard of Significance for its land use type:

Table 2: Standards of Significance	
Project Type	Standard
Commercial	No net unmitigated VMT
Public Service	15% below subregional ⁽¹⁾ average VMT for the public service use
Recreation – Campgrounds	Case-by-case basis
Recreation – Other	No net unmitigated VMT
Residential	15% below subregional ⁽¹⁾ VMT per resident
Tourist Accommodation	15% below subregional ⁽¹⁾ VMT per TAU

- (1) Subregional average VMT is determined for each jurisdiction (e.g. the city and counties)

Special Cases

- Redevelopment Projects will be assessed based on net VMT. The PIA tool will credit the project for the existing VMT based on existing land use characteristics.
- Mixed-Use Projects will be assessed based on the individual effect of each land use.

Mobility Mitigation Fee

All projects that generate VMT, except for deed-restricted affordable housing and transportation projects, pay the mobility mitigation fee on new, unmitigated VMT. The fee rate is set in the TRPA Rules of Procedure.

$$\text{Mobility Mitigation Fee} = \text{VMT} \times \text{Fee Rate}$$

TRPA charges land uses that generate trips 90% and land uses that attract trips 10% of the Fee Rate. Current fee rates can be found in Section 10.8.5 of the Rules of Procedure.

Mitigation Strategies

An applicant can propose a variety of measures in order to reduce VMT. Examples include:

- Increase transit accessibility
- Integrate affordable housing
- Unbundle parking costs
- Charge market prices for parking
- Implement a voluntary or required commute trip reduction program
- Provide ridesharing / vanpooling
- Implement subsidized transit
- Encourage telecommuting
- Provide traffic calming measures

Additional Contribution to the Mobility Mitigation Fee

Projects that have exhausted all site-specific mitigation and still are over the Standard may make an additional contribution to the Mobility Mitigation Fee in an amount sufficient to cover the actual costs for mitigating the amount of VMT over the Standard.

Mitigation Credits

A local jurisdiction may elect to do a VMT-reducing project up-front. In this case, it will be awarded credits in relation to the amount of associated VMT reduction. These credits can then be assigned to a development project in lieu of mitigation.

Other Code Modifications

- Governing Board: No longer triggered for projects that worsen Level of Service.
- Hearings Officer: No longer triggered for projects with a “significant increase” in traffic.
- Change in Operations: The Qualified Exemption is now based on **650 VMT** rather than 100 DVTE.
- Environmental Impact Statements: Exemption for change in use is now based on **650 VMT** rather than 100 DVTE.
- Driveway Standards: Now based on **1,300 VMT** rather than when a project triggers traffic analysis.
- Allocations: VMT and LOS no longer a determining factor in the release of allocations.

Effective Date and Applicability

The PIA Code of Ordinances amendments are effective on **June 26, 2021**. The Code of Ordinances amendments that waive the mobility mitigation fee for deed restricted affordable housing are effective on February 13, 2021. The most recent Mobility mitigation fee rate is effective January 26, 2021.

These provisions apply to any project where action occurs on or after the effective date.

Resources

- [Project Impact Analysis Framework](#)
TRPA Rules of Procedure
- [Project Impact Assessment Tool](#)