



## **APPENDIX E**

# **VMT Analysis**

**Fehr & Peers**

# **VMT Analysis for Los Angeles County Cannabis Programmatic EIR**

Prepared for:  
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# Introduction

Following voter approval of Measure C in November 2022, which authorizes the taxation of cannabis businesses operating in unincorporated areas, the Los Angeles County Board of Supervisors directed development of a consistent and comprehensive cannabis business licensing program. The Program involves adoption of zoning and regulatory amendments to Title 8 (Consumer Protection, Business and Wage Regulations) and Title 22 (Planning and Zoning) of the Los Angeles County Code (LACC) to establish where, how, and by whom cannabis businesses may operate. To evaluate the potential physical environmental impacts of the Program, the County is preparing a Programmatic Environmental Impact Report (EIR). As part of this analysis, a Vehicle Miles Traveled (VMT) assessment is required to evaluate potential transportation impacts associated with implementation of the Program.

## Project Description

The proposed “Project” is the Los Angeles County Commercial Cannabis Business Licensing Program, a regulatory framework designed to establish clear standards for the location, permitting, operation, monitoring, and reporting of commercial cannabis activities (“the Program”). The purpose of the Program is to allow commercial cannabis businesses to operate legally while protecting surrounding communities from potential adverse effects.

## Cannabis Business Types

The proposed Project would allow the cannabis business types described below, but restricted to existing, legally constructed, and permitted structures within eligible commercial, commercial-only mixed-use, industrial, and institutional zones.

- **Cultivation:** includes the planting, growing, and harvesting of cannabis plants, and nursery operations. Only indoor cultivation using artificial light is allowed.
- **Manufacturing:** includes the compounding, blending, processing, extracting, infusing, or otherwise making or preparing of a cannabis product. It includes two primary types based on the activities performed and the chemical(s) used for extraction and post-processing: **non-volatile manufacturing** and **volatile manufacturing**.
- **Distribution:** includes the procurement, sale, and transport of cannabis and cannabis products between licensed cannabis businesses. A cannabis distributor also may provide ancillary storage of cannabis and cannabis products while in transport.
- **Testing:** consists of laboratory processes and measurements to ensure that cannabis and manufactured cannabis products meet quality assurance requirements and do not exceed regulatory limits for compounds.
- **Retail:** offers direct sales of cannabis and cannabis products to consumers. It includes two primary types based on the activities performed and sales model.
  - **Storefront retail** is a “brick and mortar” or dispensary model, where customers visit the retailer to shop and purchase cannabis and cannabis products.
  - **Non-storefront retail** is a delivery-only model, where customers shop and order online or by phone and the cannabis or cannabis products are delivered by the retailer to the customer.

- **Microbusiness:** consists of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; and 5) Non-storefront retail sales.

**Table 1** and **Table 2** summarized eligible zones corresponding to each allowable cannabis business types. As such, cannabis businesses would either: 1) occupy sites currently used by existing businesses, resulting in a change of use; or 2) establish operations in properties that are currently vacant but have been previously developed and occupied. The Program would not permit the development of new buildings or redevelopment of existing buildings to accommodate a proposed cannabis business.

**Table 1. Allowable Cannabis Business Types in Commercial Zones**

Cannabis Business Type	Neighborhood Commercial (C-2)	General Commercial (C-3)	Commercial Manufacturing (C-M)	Mixed Use Commercial Only (MXD)
Cultivation	-	-	-	-
Distribution	-	-	Yes	-
Volatile Manufacturing	-	-	-	-
Non-Volatile Manufacturing	-	Yes	Yes	-
Testing	-	Yes	Yes	-
Storefront Retail	Yes	Yes	Yes	Yes
Non-Storefront Retail (delivery)	Yes	Yes	Yes	Yes
Microbusinesses	-	-	Yes	-

Source: Los Angeles County.

**Table 2. Allowable Cannabis Business Types in Industrial and Institutional Zones**

Cannabis Business Type	Light Manufacturing (M-1)	Restricted Heavy Manufacturing (M-1.5)	Heavy Manufacturing (M-2)	Institutional (IT)
Cultivation	Yes	Yes	Yes	-
Distribution	Yes	Yes	Yes	-
Volatile Manufacturing	Yes	Yes	Yes	-
Non-Volatile Manufacturing	Yes	Yes	Yes	-
Testing	Yes	Yes	Yes	Yes
Storefront Retail	Yes	-	-	-
Non-Storefront Retail (delivery)	Yes	Yes	Yes	-
Microbusiness	Yes	Yes	Yes	-

Source: Los Angeles County.

# Grouping

Based on the project’s cannabis business type definitions and eligible zoning, Fehr & Peers consolidated the allowable business types into groups to distinguish primary trip purposes and potential VMT implications:

## **Group 1 – Cultivation, Manufacturing, and Testing**

These uses do not include direct sales to consumers and generally do not operate as customer-facing destinations. Trip-making is expected to be dominated by employee commute trips, with additional, lower-frequency trips associated with goods movement and site services (e.g., deliveries, waste hauling, and maintenance).

## **Group 2 – Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness**

These uses involve transporting cannabis products between licensed businesses and/or selling products to consumers. In addition to employee commute trips, they are expected to generate customer/visitor trips (storefront retail), delivery-driver and delivery-vehicle trips (non-storefront retail), and inter-business transport trips (distribution). Microbusiness is included in this group because it may combine multiple activities, potentially including distribution and retail, thereby generating similar visitor and delivery trip patterns.

# VMT Analysis

The County of Los Angeles has established transportation-based significance thresholds through the *Los Angeles County Transportation Impact Analysis Guidelines*<sup>1</sup> (July 2020, “Los Angeles County TIA Guidelines”). These guidelines outline the analysis methodologies, screening criteria, and thresholds of significance used by the County to identify potential VMT impacts pursuant to CEQA Guidelines Section 15064.3(b). In accordance with the Los Angeles County TIA Guidelines, a VMT screening is conducted as an initial step to assess whether a less-than-significant determination can be made without a full VMT analysis.

# VMT Screening

The Los Angeles County TIA Guidelines provides thresholds to determine whether a project can be screened out of needing a VMT analysis. Since the Program isn’t permitted on residential land use, it was evaluated against three different screening criteria per Section 3.1.2 of the Los Angeles County TIA Guidelines. The screening criteria used are detailed below:

- **Non-Retail Project Trip Generation Screening Criteria:** A non-retail project is considered a “small project” if it does not generate a net increase of 110 or more daily vehicle trips. This criterion can be used in conjunction with the project’s location and average trip distance to determine whether a less-than-significant determination can be made.
- **Retail Project Site Plan Screening Criteria:** A project that contains a local serving retail use is assumed to have less-than-significant VMT impacts for the retail portion of the project. If the project does not contain retail uses that exceed 50,000 square feet of gross floor area,

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<sup>1</sup> Los Angeles County Public Works, [Transportation Impact Analysis Guidelines](#), July 2020

further analysis is not required and a less-than-significant determination can be made for the retail component of the project.

- **Proximity to Transit Based Screening Criteria:** If a project is located within a one-half mile radius of a major transit stop<sup>2</sup> or an existing stop along a high-quality transit corridor<sup>3</sup>, then the following subsequent questions should be considered:
  - Does the project have a Floor Area Ratio less than 0.75?
  - Does the project provide more parking than required by the County Code?
  - Is the project inconsistent with the SCAG RTP/SCS<sup>4</sup>?
  - Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

If the answer to all four questions is no, further analysis is not required, and a less-than-significant determination can be made.

Because some project details, such as location, size, and specific use of individual projects under the Cannabis Program, have not yet been defined, a project-level VMT analysis cannot be conducted for the full program at this time. Therefore, a programmatic level evaluation has been conducted and is presented below.

## Program VMT Impact Analysis

This section provides a framework of applying the set of VMT screening criteria described above to proposed cannabis uses under the proposed Program. Commercial cannabis uses could be permitted within unincorporated areas of Los Angeles County. Because the individual sites for future cannabis businesses have not yet been identified, the specific locations and sizes of cannabis development remain unknown. Nevertheless, the following screening criteria may be applicable to cannabis uses under the Cannabis Program:

- **Projects Located in Transit Proximity Area** – applicable to all cannabis business types
- **Small Projects** – applicable to all cannabis business types except for storefront retail
- **Locally Serving Retail Projects** – applicable to storefront retail only

Application of these criteria to individual cannabis business permitted under the Program is discussed in the following sections.

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<sup>2</sup> CA Public Resource Code, §21064.3 defines major transit stop as follows:

- An existing rail or bus rapid transit station.
- A ferry terminal served by either a bus or rail transit service.
- 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. (This definition was amended from an interval of 15 minutes to 20 minutes as of January 2025.)

<sup>3</sup> CA Public Resource Code, §21155 defines high-quality transit corridor as: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

<sup>4</sup> SCAG RTP/SCS – Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range planning document updated every four years as required by federal and state regulations. The most recent version is Connect SoCal 2024. <https://scag.ca.gov/connect-socal>

## Projects Located in Transit Proximity Area

A project located in a transit proximity area can be presumed to have a less-than-significant VMT impact, if it meets additional considerations recommended by Los Angeles County TIA Guidelines. For cannabis businesses located outside of a transit proximity area, the VMT could exceed the allowable thresholds identified by the County and could potentially result in a significant VMT impact. However, cannabis businesses that are not within the Proximity to Transit Based screening criterion could still potentially be found to have a less-than-significant VMT impact based on the Small Project or Locally Serving Retail Projects criteria, which are described in the subsequent sections. **Since the location of individual business under the Cannabis Program have not yet been identified, a less-than-significant determination cannot be made using this criterion.**

## Small Projects

Projects anticipated to generate fewer than 110 average daily vehicle trips (ADT) may be evaluated using the Small Project Screening Criteria as one line of evidence in the VMT analysis. A less-than-significant VMT impact determination may be supported where the project would not be expected to generate longer-than-average trips (e.g., trips exceeding the neighborhood's or planning area's average trip length), based on project-specific characteristics and available data. This screening criteria is applicable to the Cannabis Program land use categories except for storefront retail.

Trip generation estimates for the Cannabis Program activities were developed using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12<sup>th</sup> Edition (August 2025) as the primary data source, supplemented by other published sources where ITE data are not available. Consistent with standard methodology, vehicle trip rates are expressed in terms of average daily trips per 1,000 square feet (ksf) of gross floor area (GFA) or per acre, depending on the land use type.

The following land use groups and associated trip generation rates can be used to estimate the trip generation for various cannabis business types:

### Group 1 – Cultivation, Manufacturing, and Testing

- **Cultivation:** The ITE Trip Generation Manual does not provide a daily trip rate for cultivation uses. Therefore, alternative sources of trip generation rates were explored based on prior studies. A rate of 67.3 daily trips per acre for "Indoor Cultivation"<sup>5</sup> was applied to the proposed cultivation uses, which aligns with the proposed project's restriction to indoor operations. This rate was converted to 1.54 trips per 1,000 square feet using the formula:  $67.3 \text{ trips per acre} \div 43.56 \text{ (thousand square feet per acre)}$ .
- **Manufacturing:** ITE Trip Generation Manual "Manufacturing" (Land Use 140) daily trip rate of 4.27 per 1,000 square feet of gross area was used for both Non-volatile Manufacturing and Volatile Manufacturing.
- **Testing:** ITE Trip Generation Manual does not provide a daily trip rate for "Testing" land uses. The "Research and Development Center" category (Land Use 760), which involves similar analytical and laboratory activities, was applied to for cannabis testing businesses. Therefore, a trip generation rate of 9.47 daily trips per 1,000 square feet of gross area was applied.

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<sup>5</sup> County of Santa Barbara, Final Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program, December 2017

## Group 2 – Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness

- **Distribution:** ITE Trip Generation Manual does not provide a specific daily trip rate for “Distribution” land uses. The “Warehouse” category (Land Use 150), which includes distribution- and storage-related activities, was applied to cannabis distribution businesses. Accordingly, a trip generation rate of 1.38 daily trips per 1,000 square feet of gross area was used.
- **Retail (Storefront and Non-storefront):** ITE Trip Generation Manual defines “Cannabis Dispensary” (Land Use 882) as a standalone facility where cannabis is sold to patients or retail consumers in a legal manner, with an average daily trip rate of 227.76 per 1,000 square feet of gross area. However, ITE does not specify whether this land use represents storefront or non-storefront (delivery-only) operations. For a non-storefront retail, delivery-only model, trip generation is driven primarily by delivery activity and varies by the operator’s business plan. Thus, it is more appropriate to define a project’s maximum size by total daily vehicle trips, including delivery and employee commute trips, and to evaluate whether that total remains below 110 ADT.
- **Microbusiness:** The proposed Program would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales. The daily trip rates listed above should be considered for Microbusiness on a case-by-case basis.

### Trip Generation Estimates

Under the proposed program, commercial cannabis activities would only be allowed in existing, legally constructed, and permitted structures located in eligible commercial, commercial-only mixed-use, industrial, and institutional zones. The *Project Description* section listed eligible existing land use types corresponding to each cannabis business types, as shown previously in **Table 1** and **Table 2**.

For projects that would occupy currently vacant properties, **Table 3** outlines the maximum allowable size for Group 1 and Group 2 cannabis business types that would generate fewer than 110 ADT.

For individual projects that propose to replace existing businesses currently operating on these sites, a trip credit may be applied to account for the travel demand that would be eliminated by the removal of the existing use. **Table 4** presents the daily trip generation rates for both the existing eligible land use types as well as the proposed Group 1 and Group 2 cannabis business types.

**Table 3. Project Maximum Allowable Size per the Small Project Screening Criteria, without Existing Trip Credit**

Group	Cannabis Business Type	Maximum Project Size	Unit [a]	Daily Trip Generation Rate
Group 1	Cultivation	71.4	KSF	1.54
	Non-volatile manufacturing	25.8	KSF	4.27
	Volatile manufacturing	25.8	KSF	4.27
	Testing	11.6	KSF	9.47
Group 2	Distribution	79.7	KSF	1.38
	Non-storefront retail [b]	0.5	KSF	227.76
		110	Total daily vehicle trips	N/A
	Microbusiness	Refer to the rates above on a case-by-case basis		

Note:

[a] KSF = 1,000 square feet

[b] The maximum allowable size per the Small Project Screening Criteria is applicable to non-storefront retail only. For storefront retail, please refer to the subsequent section of **Locally Serving Retail Projects**.

**Table 4: Trip Generation Rates of Eligible Existing Land Use and Proposed Allowable Land Use**

Proposed Allowable Cannabis Business Type				Existing Eligible Land Use				
Cannabis Business Licensing Type	ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate (trips/ksf)	Eligible Existing Land Use Type	ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate (trips/ksf)	
Group 1	Cultivation	190	Cannabis Cultivation and Processing	1.54 [b]	Industrial	110	General Light Industrial	3.6
	Non-volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
					Commercial	822	Strip Retail Plaza (<40k)	54.45
	Volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
	Testing	760	Research and Development Center	9.47	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
					Institutional	730	Government Office Building	22.59
					760	Research and Development Center	9.47	
				630	Walk-In Clinic	37.6		
Group 2	Distribution	150	Warehouse	1.38	Industrial	150	Warehouse	1.38
						140	Manufacturing	4.27
						110	General Light Industrial	3.6
	Non-storefront retail	882	Cannabis Dispensary [c]	227.76 trips/ksf or 110 total daily vehicle trips	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
Microbusiness	Refer to the rates above on a case-by-case basis [d]			Refer to the rates above on a case-by-case basis [d]				

Note:

[a] Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, August 2025.

[b] The daily trip rate for cultivation is not provided in the ITE Trip Generation Manual. Therefore, it was sourced from the County of Santa Barbara FEIR, which reports 67.3 trips per acre for "Indoor Cultivation." This rate was converted to 1.54 trips per 1,000 square feet using the formula: 67.3 trips per acre ÷ 43.56 (thousand square feet per acre).

[c] ITE definition: A cannabis dispensary is a stand-alone facility where cannabis is sold to patients or retail consumers in a legal manner. ITE defines "Cannabis Dispensary" with an average daily rate of 227.76 trips per 1,000 sf GFA, but does not distinguish storefront versus delivery-only operations. For non-storefront retail, trips are primarily delivery-driven and vary by operations; therefore, project size is more appropriately screened using total daily vehicle trips (delivery + employee commute), evaluated against the 110 ADT threshold.

[d] The proposed Project would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales.

## Trip Distance

Trip distance is a location-based metric that, together with trip generation estimates, helps evaluate potential VMT impacts. It reflects where cannabis businesses are located and the typical origins and destinations of employee, customer, and delivery trips.

For Group 1 uses (Cultivation, Manufacturing, and Testing), trip distance is driven primarily by employee commute trips. These businesses are more likely to result in a less-than-significant VMT impact when commute distances are shorter and/or when a higher share of employees use non-single-occupant vehicle modes (e.g., carpool, transit, biking, or walking).

For Group 2 uses (Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness), trip distance reflects a combination of employee commute trips and product movement/customer access trips, including deliveries. As a result, Group 2 uses can generate higher VMT than Group 1 because they add trip-making beyond employee travel and may involve longer or more frequent vehicle trips across a broader service area.

Because individual cannabis business locations, operating characteristics, and intensity are not yet defined, trip distances cannot be reliably estimated at this time. Likewise, individual project sizes and maximum trip generation rates cannot be reliably determined. Therefore, **the Small Project screening criterion cannot support a less-than-significant VMT determination for the Program.**

## Locally Serving Retail Projects

The Cannabis Program would allow for the establishment of two types of commercial cannabis retail operations in select areas of unincorporated Los Angeles County: cannabis storefront and non-storefront retail (delivery-only). Non-storefront retail operations, which exclusively provide delivery services, are not classified as locally serving and therefore would not qualify under this criterion.

Based on the Los Angeles County TIA Guidelines, retail projects under 50,000 square feet are generally presumed to be locally serving, and therefore result in a less-than-significant VMT impact. Storefront cannabis retail businesses within this size threshold would typically qualify under this criterion. However, storefront cannabis businesses that exceed 50,000 square feet may not be presumed locally serving, and could potentially result in a significant VMT impact if their VMT level exceeds the County's thresholds. **Since individual storefront retail sizes have not yet been identified, a less-than-significant determination cannot be made using this criterion.**

## Determining Significance

While some individual sites may meet the screening criteria and result in a less-than-significant VMT impact, not all future projects are guaranteed to do so. If a proposed commercial cannabis business does not meet any screening criteria, its VMT may exceed the County's impact threshold, potentially resulting in a significant impact. Under the proposed Program, individual businesses may be located outside a transit proximity area, may exceed the maximum levels associated with the 110-ADT small project threshold, and storefront retail may exceed the 50,000-square-foot locally serving threshold; in addition, project-specific trip distances cannot be determined at this time. **Therefore, the VMT impact under the proposed Program would be potentially significant.**

# Mitigation Measures

VMT mitigation cannot be quantified without project-specific locations and operating characteristics. However, applicable transportation demand management (TDM) strategies from the Los Angeles County TIA Guidelines (**Table 5**) may be considered to reduce VMT, primarily by targeting employee commute trips. These measures are generally less effective for delivery, visitor, and inter-business transport trips. Because the Program includes uses that generate customer/visitor, delivery, and distribution trips, VMT reduction strategies are not readily available and reducing impacts to a less-than-significant level would be infeasible.

For example, pedestrian network improvements (e.g., sidewalks) required as a condition of approval would likely be limited in extent (often to the project frontage) and may not create a connected, convenient walking network that would meaningfully shift travel behavior. In addition, CAPCOA's quantified effectiveness for this measure depends on the incremental increase in sidewalk coverage; where sidewalks already exist or few improvements are warranted, the VMT reduction would be minimal.

**Therefore, the Program would result in a significant and unavoidable VMT impact.**

**Table 5. TDM Strategies Appropriate for Commercial Cannabis Businesses**

Category [a]	Measure [a] and <i>Description</i> [b]	Maximum VMT Reduction [b]
Commute Trip Reduction	<p><b>Commute Trip Reduction (CTR) Programs with Required Monitoring</b></p> <p><i>This measure will implement a mandatory CTR program with employers. CRT programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT.</i></p>	26.0% [c]
	<p><b>Ride Sharing Programs</b></p> <p><i>This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT.</i></p>	8.0%
	<p><b>Subsidized or Discounted Transit Programs</b></p> <p><i>This measure will provide subsidized or discounted, or free transit passes for employees. 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.</i></p>	5.5%

Category [a]	Measure [a] and <i>Description</i> [b]	Maximum VMT Reduction [b]
Neighborhood/ Site Enhancement	<p><b>Pedestrian Network Improvements</b></p> <p><i>This measure will increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.</i></p>	6.4%

Notes:

[a] Source: Section 3.1.5 of Los Angeles County TIA Guidelines, July 2020

[b] Source: California Air Pollution Control Offices Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, December 2021.

[c] CTR Programs with Required Monitoring must include all other elements described for the voluntary program plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The CAPCOA Handbook provides detailed implementation requirements.