**Zoning and Platting Commission**
**Recommendation to City Council**
**Concerning Traffic Impact Analysis Requirements**

Whereas, Chapter 211 of the Texas Local Government Code authorizes municipal zoning regulation to promote public health, safety, and general welfare, and Section 211.004 identifies lessening street congestion and facilitating adequate transportation among the purposes of zoning regulations; and

Whereas, the Zoning and Platting Commission considers zoning requests and considers whether the change in demand of traffic affects the safety of the surrounding transportation system, and

Whereas, the purpose of a Traffic Impact Analysis (TIA) is to evaluate how a proposed new development will affect the surrounding roadway and transportation network and identify congestion problems and safety risks before a project is approved. The analysis may recommend changes to improve safety and keep traffic moving smoothly, and

Whereas, § 25-6-113 of Austin's Land Development Code requires a traffic impact analysis for site plan, zoning, and rezoning applications when the expected number of trips generated by a project exceeds 2,000 vehicle trips per day, subject to applicable waiver provisions; and

Whereas, traffic associated with a vacant or substantially underused property may differ materially from traffic estimated for full occupancy, a prior use, or the maximum intensity allowed by existing zoning, and these figures should be separately identified to support accurate evaluation of proposed development; and

Whereas, the Commission has received public comments and case-specific concerns regarding how existing land-use trip generation, project-generated trips, net-new trips, TIA waivers, and access-point recommendations are documented in zoning and rezoning cases; and

Whereas, the Commission believes that the public, applicants, and decision-makers would benefit from a consistent explanation of the assumptions and methodology used to determine whether a TIA is required under Section 25-6-113 and whether a waiver or other transportation review applies; and

Whereas, the Commission does not intend this recommendation to prejudge any pending application or to substitute the Commission's judgment for the City Manager's administration of the Land Development Code and Transportation Criteria Manual;

Now, therefore, be it resolved that the Zoning and Platting Commission recommends that the City Council direct the City Manager to develop and implement written administrative guidance and propose any necessary Land Development Code or Transportation Criteria Manual amendments to strengthen transportation review, including comparisons with development or reuse under existing entitlements, reporting on existing transportation conditions, and the treatment of existing-use trip reductions for vacant or substantially underused properties. The guidance and any proposed amendments should addressing the following:

1. For zoning, rezoning, and site plan applications, document whether the transportation study determination is based on an applicable threshold, a waiver, another authorized study type, or an existing approved analysis. Identify the governing provision, supporting findings, and any review deferred to a later stage.

2. Separately report projected gross daily and relevant peak-hour vehicle trips; traffic associated with documented existing occupancy and operations; any modeled traffic associated with prior or authorized development; each existing-use reduction and other adjustment; and the resulting figures used for study determination and impact analysis. Identify the trip-generation methodology used, including applicable ITE Trip Generation Manual rates, local traffic counts, and any adjustments for existing conditions, land-use mix, transit access, or other relevant factors. Document the supporting data, reference dates, and authority for each adjustment.

3. Establish a consistent method for comparing the proposed development's projected daily and relevant peak-hour vehicle trips with estimated trips from a realistic development or reuse scenario under existing zoning, applicable regulations, and valid approvals. Document the assumed uses, scale, access, and material site constraints. Separately, identify the applicable authority and support evidence for any existing-use trip reduction applied to a transportation study determination. Prior use , theoretical building capacity, and maximum permitted intensity alone are insufficient to support a reduction. Identify any legally protected approvals that require different treatment and explain how they affect the determination.

4. Use the 24 months preceding the application filing as the standard lookback period for documenting site occupancy and operations. Where records are available, report the typical level and range of occupancy and activity, including the timing and duration of substantial vacancies, partial occupancy, and temporary closures. Identify material changes after filing and specify when updated information is needed. Use representative site traffic counts or a documented, staff-approved estimates tied to actual operating conditions to characterize site-generated traffic. I dentify the

sources, dates, and limitations of the evidence, including any gaps in the 24-month record.

5. When access points, roadway connections, or transportation safety conditions are material to the recommendation, identify the applicable standards and summarize current conditions, projected traffic distribution and relevant peak-hour movements, and effects on people walking, bicycling, using transit, and driving. Identify unresolved issues and the stage at which they will be evaluated.

6. Clarify when a Transportation Assessment, Zoning Transportation Analysis, Neighborhood Traffic Analysis, mitigation assessment, or other transportation review is required or appropriate even when a full TIA is not required, and identify the applicable authority.

7. Distinguish adjustments used to determine transportation study requirements from assumptions used in operational analysis and credits or offsets used for Street Impact Fees or infrastructure obligations. Ensure required improvements or payments comply with applicable proportionality requirements.

8. Report back to the Council, the Planning Commission, and the Zoning and Platting Commission within 120 days after Council action with the written guidance, proposed Code or Transportation Criteria Manual amendments, implementation schedule, and any unresolved legal or technical issues. Include a standard public reporting format for transportation determinations and existing-use trip reductions.