



Transportation Demand Management Implementation Guide

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FOR **City/County Association of Governments of San Mateo County**

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Purpose

The *C/CAG TDM Policy Implementation Guide* is a companion document to the *C/CAG TDM Policy Update Approach* document. This guidance document describes the necessary process, as well as agency roles and responsibilities to put the TDM Policy into action; a statutorily required component of the Congestion Management Program (CMP). For more details on the underlying rationale and methodology for the *C/CAG TDM Policy* please refer to the *C/CAG TDM Policy Update Approach* document.

The *Implementation Guide* is divided into five (5) sections. These sections will address the following:

1. Implementing the new ADT project review threshold
2. Implementing C/CAG TDM measures
3. Monitoring & reporting requirements
4. Process flowchart
5. Determining whether or not a jurisdiction is exempt from this Policy

Implementing the New Project Review Threshold (ADT)

Unless a member jurisdiction has been exempted from the C/CAG TDM Policy according to the process described on page 4 of this document, any new development project anticipated to generate at least 100 ADT is subject to the TDM Policy and must therefore complete a TDM Checklist and implement associated measures to mitigate traffic impacts. As also described in the *Policy Update Approach*, ADT thresholds are correlated to an underlying project characteristic, depending on land use and project size.

Through research and stakeholder feedback, it has been determined that a tiered approach, with distinct thresholds for “small projects” and “large projects” would be best. The thresholds were determined by evaluating several technical resources, including multiple peer-reviewed trip generation guidance documents, California Office of Planning & Research (OPR) policy advisories, as well as case study TDM policies in California and other regions nationwide.

Traditionally, trip generation methods have been most prominently documented in the ITE *Trip Generation Manual*. However, as part of this TDM Policy Update, flexibility in choice of ADT calculation method is allowed. These may include, but is not limited to, the U.S. Environmental Protection Agency *Smart Growth Mixed-Use Trip Generation Tool* (US EPA MXD), San Diego Association of Governments (SANDAG) *Trip Generation for Smart Growth* guide, and even locally developed methods based on validated trip counts.

Review of Recommended ADT Thresholds, Correlated with Project Size Characteristic^{1 2 3}

	Small Projects	Large Projects
Non-Residential: Office, Industrial, and Institutional	100 – 499 ADT (10,000 – 49,999 sq. ft.)	500+ ADT (50,000+ sq. ft.)
Non-Residential: Medical & Lodging	100 – 499 ADT (10,000 – 49,999 sq. ft.)	500+ ADT (50,000+ sq. ft.)
Non-Residential: Retail	100 – 499 ADT (30-99 employees)	500+ ADT (100+ employees)
Residential: Multi-Family*	100 – 499 ADT (20 - 49 units)	500+ ADT (50+ units)

¹ The quantified square footage, employees, and units in this table demonstrate plausible project size relative to the estimated project ADT. The representative project size values are not exact. They are based on documented linear relationships between project size and respective site travel demand. More detail is available in research references cited in Appendix C & D of the companion *Policy Approach* document.

² Justification for managing congestion on the CMP Network, particularly by smaller-sized projects, is delegated by State law (CA Govt. Code 65088). In fact, there is no legally identified minimum project size. Therefore, C/CAG can exercise discretion in setting minimum project size thresholds for inclusion in this TDM Policy. However, research of TDM policy advisories and case studies documented in Appendix D (CA Office of Planning & Research, City of Carlsbad, et al) indicate appropriate minimum ADT thresholds and linear correlation between daily trip generation and project size as proposed in Table 1, above.

³ The TDM Policy only applies to multi-family residential developments only. Single-family home developments are exempted from this TDM Policy.

Non-Residential land uses will utilize ADT correlated with the project size in square footage, except for Retail, which will rely on ADT correlated with the estimated number of employees. Residential projects will utilize ADT correlated with the number of units as the threshold metric. Regarding Mixed-Use projects featuring multiple land uses on-site, it is recommended that ADT be calculated in correlation with the predominant land use, in terms of square footage. For example, if a Mixed-Use project is planned to feature 100,000 square feet of office space alongside 50,000 square feet of retail space, then the ADT associated with the majority office space should be calculated, and TDM measures applicable to the Large Non-Residential (Office, Industrial, and Institutional) land use shall apply. The same approach is recommended where Non-Residential and Residential land uses are mixed on-site; ADT should be calculated in correlation with the land use featuring the larger geographic footprint when choosing the appropriate TDM threshold.

Implementing TDM Measures

All projects subject to the C/CAG TDM Policy shall implement a set of TDM measures selected in the TDM Checklist. Applicants shall select all “Required” TDM measures as well as enough “Additional Recommended” measures to meet the minimum targeted trip reduction requirement. For all project types, except two, the minimum trip reduction requirement is 35% below baseline ADT for the project site. Exceptions apply to Transit-Oriented Development (TOD) projects within 0.5 miles of MTC-defined “high-quality transit” and small multi-family residential projects; for these, a minimum 25% trip reduction is required. To guide applicants on the relative impact of TDM measures, a weighted point system is provided in the TDM Checklist - the higher the point value, the higher the potential trip reduction impact. These point values are based on literature review of transportation research, best practices, and stakeholder feedback. Further detail regarding background methodology is available in Appendix A of the *Policy Update Approach* document. Ultimately, applicants should focus on achieving the required trip reduction percentages, using the point scoring system as a guide, to achieve vehicle trip reduction and mode share targets.

The TDM Checklist categorizes development projects according to their proximity to “high quality” transit, defined as a transit station or stop featuring maximum 15-minute service frequency (headways) during weekday peak hours between 6-10 a.m. and 3-7 p.m. This definition is consistent with that of the Metropolitan Transportation Commission (MTC). Therefore, in addition to assessing project ADT and land use, the development applicant must also determine one of the three following project categories applicable to their project, according to proximity to high-quality transit:

1. **Transit-Oriented Development (TOD)** – project located within 0.5 miles of “high quality” transit.
2. **Transit Proximate** – project located between 0.5 – 3 miles of “high quality” transit.
3. **Non-Transit Proximate** – project located more than 3 miles from “high quality” transit.

The significance of assigning one of these proximity categories is that some TDM measures will only be required of projects meeting one of the above three geographic criteria. In the case of TOD projects, for example, there is a lower trip reduction requirement as compared to other project types.

To facilitate implementation of the C/CAG TDM Policy, as well as for future TDM monitoring and data collection, it is proposed that development applicants submit a TDM Checklist with their development application to the governing jurisdiction Planning Department, as part of the development review process. The responsible jurisdiction staff would then notify C/CAG of receipt of this Checklist. Through

this correspondence, C/CAG becomes aware of the prospective project that is subject to review under this TDM Policy.

In the course of its review of the development application and accompanying Checklist, the jurisdiction is expected to verify the accuracy and completeness of the applicant's TDM Checklist submittal, including matching the appropriate Checklist with advertised project scale (i.e., >100 ADT) and type (i.e., Small/Large, Non-Residential/Residential). Commute.org will be available to help the local jurisdiction review the applicant's Checklist and help recommend appropriate TDM Checklist measures.

Once the local jurisdiction has verified the applicant's Checklist accuracy and completeness, it proceeds to condition project approval on implementation of the selected measures in the Checklist. Then, at the conclusion of the development review process, local jurisdiction staff forwards the final approved Checklist to C/CAG.

Policy Implementation Through Monitoring & Reporting

Monitoring and reporting the status of TDM implementation at recent development projects is crucial to meeting local and regional land use and transportation policy goals. To accomplish this, C/CAG will partner with Commute.org to administer the monitoring and reporting process. Every two years (biennially), Commute.org will distribute a standardized survey to the tenants of approved and occupied development projects subject to review under the C/CAG TDM Policy. *(Please refer to the C/CAG TDM Policy Update Approach document for discussion of thresholds that qualify projects for this level of review).* As discussed below, efforts have been made to minimize, to the extent possible, local jurisdiction involvement in related monitoring and enforcement activities.

Periodic Project Tenant Surveying

Upon completion of a new development project, including actual occupation and operation by tenants, Commute.org will solicit survey participation through correspondence with an established point of contact at the project site. Commute.org will distribute standardized surveys to tenants with the intent of recording two particular datasets: 1) information from the tenant regarding the completeness of implementing TDM measures conditioned as part of project approval and 2) information regarding tenant employees' travel behavior, such as mode and frequency.

Commute.org will prescribe a timeline during which the survey participants may gather requisite data, complete the survey, and return survey. The survey data will be shared by Commute.org with C/CAG and local jurisdictions and incorporated into a TDM monitoring database to help manage land use impacts on the countywide CMP Network.

Collaborative Process to Remedy to TDM Implementation

Non-compliance/participation

This occurs when there is failure to confirm and/or implement agreed measures. Resolution will likely require local jurisdiction support and involvement with the project developer or tenant. It is suggested that the local jurisdiction and Commute.org convene a meeting to strategize a path towards adequate TDM implementation and, ultimately, TDM Policy compliance. Local jurisdictions shall assist monitoring and reporting efforts by also engaging in follow-up with developers or responsible project tenants that

have not implemented TDM measures that were previously required as part of Conditions of Approval during the local development review process.

Failure to meet target trip reduction targets/mode share targets

Achieving trip reduction and mode share targets is intended to be a collaborative, non-punitive process; no fines to the project owner or tenant are proposed as part of this process. If a project reports trip reduction performance that is short of the TDM Policy goals, then it is proposed that Commute.org, in collaboration with the project owner or tenant, review the selected Checklist measures for the affected project and determine whether other measures might be more appropriate, in order to achieve the established targets.

On the final page, a flowchart is provided to illustrate the process to implement the C/CAG TDM Checklist.

Determining C/CAG TDM Policy Exemption

As described in the *C/CAG TDM Policy Update Approach* document, a C/CAG member jurisdiction may request exemption from the requirement to apply the *C/CAG TDM Checklist* to new development projects which are anticipated to generate 100 or more ADT. A jurisdiction that is granted this exemption is considered exempt from the C/CAG TDM Policy, which is predicated on implementing a TDM Checklist. This section details the process to determine why and how a member jurisdiction request an exemption.

How Exemption Determination is Made

A member jurisdiction that has adopted its own TDM program intended to regulate travel demand impacts at land development projects may consider requesting an exemption from the C/CAG TDM Policy, provided the local jurisdiction can sufficiently prove that their adopted TDM measures meet or exceed trip mitigation impacts required by C/CAG. However, since California Government Code Section 65089 (b) still requires that Level of Service (LOS) standards apply to the countywide CMP Network, the burden of proof is on local jurisdictions to document how their locally adopted travel demand metric will sufficiently mitigate traffic impacts on the CMP Network.

The local jurisdiction shall request an exemption by submitting documentation of their TDM regulations with the aforementioned letter to C/CAG detailing how the projected SOV trip reduction percentages meet or exceed 25% for TOD and small residential projects, and 35% for all other project land use types. C/CAG will review the local jurisdiction's request for exemption and, if approved, will issue a confirmation of exemption.

This process for requesting an exemption would address a jurisdiction's overall TDM program or ordinance and is not intended for application on a project-by-project basis.

TDM Policy Process Flowchart

The sequence of events involved in implementing the C/CAG TDM Policy is illustrated below. The process is a collaborative one, which relies on frequent data sharing and communications between local jurisdictions, C/CAG, and Commute.org, the latter of which will assist policy administration at the regional level.

