



**CITY/COUNTY ASSOCIATION OF GOVERNMENTS
OF SAN MATEO COUNTY**

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May 21, 2025

Randy Breault, Public Works Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: CMP TDM Policy Exemption Request – Brisbane

Dear Randy,

Thank you for resubmitting Brisbane's request for exemption from C/CAG's TDM Policy, as outlined in your letter dated April 29, 2025. Pursuant to the C/CAG Board's recent action to amend its TDM policy to provide the C/CAG Executive Director with additional discretion in determining whether a locally adopted TDM Plan can be exempted from the C/CAG Policy, it has been determined that Brisbane's adopted policy meets the threshold to qualify for an exemption, as discussed in detail below.

Brisbane TDM Policy Requirements – Summary

- The Brisbane TDM Policy divides projects into 3 tiers as shown:

Brisbane TDM			
	Description	Drive alone Mode Share	Trip Red. Req.
Tier 1	- All non-residential projects generating >100 ADT (other than those covered under Tier 2 & 3)	52%	
	- Residential projects otherwise not exempted	67-73%	25% small residential or TOD; 35% others
Tier 2	- Office/R&D < 50ksf - Warehousing and trade commercial projects	52%	
Tier 3	Office/R&D >50ksf	52%	

- Monitoring and enforcement provisions vary by tier.
- Applicability – Policy applies to:
 - All projects generating ≥ 100 ADT
 - Nonresidential projects that include improvements valued at more than \$500k in construction costs, regardless of the number of average daily trips generated.
 - Any project involving additions, alterations, or major rebuilds to buildings completed within any five (5) year period regardless of the number of average daily trips generated.
- Exemptions – Policy includes specific exemptions for, among others, affordable, inclusionary or Target housing units; and “Projects with environmental benefits”.

C/CAG Policy vs. Brisbane TDM Policy

According to the amended C/CAG Policy, an exemption request must clearly document how a jurisdiction’s adopted city-wide TDM regulations ensure 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 may consider minor deviations from these criteria where it can be objectively demonstrated that a locally adopted TDM plan is substantially consistent with these criteria and is likely to generate superior city-wide results to the C/CAG TDM Policy through implementation of trip reduction targets, monitoring, reporting, enforcement mechanisms and/or other documented measures that are materially more robust than those in the C/CAG policy. So, while the Brisbane TDM Policy includes some exceptions that are otherwise not included in the C/CAG TDM policy, it has been found to be substantially consistent and likely to generate superior city-wide results based on the following:

- Trip Reduction Comparison – Table 1, included in Brisbane’s request and shown below, represents anticipated build-out in Brisbane’s General Plan in various land use categories and provides a comparison of trip reduction required by Brisbane’s Policy vs. C/CAG’s Policy. The Table estimates the **City’s requirements would reduce trips 26% below C/CAG policy requirements.**
 - Of particular note, the Baylands Office buildout potential totals approximately 6.4M square feet, and represents the vast majority of growth opportunity sites in Brisbane. These projects will be subject to the Tier 3 requirements which far exceed C/CAG TDM Policy requirements.

Table 1: C/CAG & City TDM Comparison

Land Use	Category	Amount	Baseline (ITE)		C/CAG TDM Requirement		City TDM		City Trip Reduction Percent Below C/CAG
			PM Trip Rate	PM Trips	Trip Reduction ¹	Net PM Trips	PM Trip Rate ^{2,3,4}	Net PM Trips	
Office (Baylands)		6,398 ksf	1.44	9,213	-3,224	5,989	0.55	3,519	41%
Office / R&D (Sierra Point)		1,511 ksf	1.44	2,176	-761	1,415	0.85	1,284	9%
Guadalupe Quarry Warehouse Project ⁴		1,322 ksf	0.135	178	-62	116	0.099	131	n/a ⁴
Retail (Baylands) ⁵		102 ksf	9.03	923	-323	600	5.39	551	8%
Hotel (Baylands) ⁶		800 rooms	0.59	472	-118	354	0.43	344	3%
Residential (Baylands) ⁶		2,200 DU's	0.51	1,122	-281	841	0.30	661	21%
Residential (Other) ^{7,8}		749 DU's	0.51	382	-134	248	0.51	382	n/a ⁷
Total Trips		-	-	14,083	-4,769	9,314	-	6,872	26%

Notes: s.f. = square feet

1. Most of the employment within Baylands would fall within 1/2 mile of the Bayshore Caltrain Station and therefore would be subject to a 25% reduction. A 35% reduction is shown for conservative purposes. Residential and hotel uses assume a 25% reduction.
2. Baylands trip rates are from the DEIR and include the effects of internalization due to the mix of uses, proximity to transit and other nearby destinations, and required TDM measures. See Appendix F1 Transportation Impact Assessment which is available here: <https://www.brisbaneca.org/media/45856>
3. Sierra Point trip rates are based on Sierra Point project EIRs for 9000 Marina Boulevard and Sierra Point Towers.
4. Guadalupe Quarry Warehouse project trip rates are from data collection prepared for warehouses for Guadalupe Quarry EIR, which are lower than ITE rates but represent more recent data. The trip rate is just for passenger vehicle trip generation, and not trucks, as presented in Table 2 of Appendix H. The EIR determined that the maximum feasible vehicle trip generation reduction associated with TDM is 26.4% even after compliance with C/CAG's given the lack of substantial evidence supporting a 35% reduction in the project's context. The EIR is accessible here: <https://www.brisbaneca.org/cd/project/guadalupe-quarry-redevelopment-project>
5. Other retail would be locally serving per the prior exemption request.
6. All residential and hotel land uses would fall within 1/2 mile radius of the Bayshore Caltrain Station; therefore, a 25% reduction is assumed for those land uses.
7. Most other residential development in Brisbane would not be subject to C/CAG TDM requirements (e.g., small projects, ADU's, or affordable housing projects). However, for conservative purposes, these units are included as some development would have been subject to C/CAG's policy.
8. While no growth is planned for Crocker Park, there were 10,465 existing employees in Brisbane in 2015 per the City of Brisbane General Plan, most of whom would be subject to §10.52.040.B of the TDM ordinance during future building improvements. C/CAG's policy does not cover these existing uses, and therefore any future TDM compliance associated with Brisbane's TDM policy would reduce trips compared to the C/CAG policy.

Source: Fehr & Peers, 2025.

- Monitoring, Reporting and Enforcement Provisions – The monitoring, reporting and enforcement provisions identified in Brisbane Municipal Code Section 10.52 generally exceed the C/CAG TDM Policy provisions, particularly as applied to Tier 3 projects which are required to achieve drive alone mode share targets of 52%, with an escalating penalty structure for noncompliance.

- All projects are monitored through submittal of an annual compliance report that documents the implementation of required TDM measures. Tier 1 projects must submit this report annually for the first six years after occupancy; Tier 2 projects must submit this report annually for the first 20 years after occupancy; and Tier 3 projects must submit this report annually for the lifespan of the project. Tier 1 and Tier 2 local-serving, nonresidential projects, while required to submit an initial compliance report, are exempt from submitting annual compliance reports. Tier 3 project requirements include annual compliance report, mode share survey (statistically valid provisions), and driveway counts.
- Policy application to existing uses – C/CAG’s policy does not apply to preexisting uses unless either a new more intensive land use is introduced, or a structure is modified, such that it would generate more than 100 ADT over preexisting conditions. Brisbane’s policy has the potential to incorporate more existing uses based on program applicability, as outlined above.

Based on a combination of these factors it is determined that Brisbane’s TDM Policy qualifies for an exemption from the C/CAG TDM Policy requirements. Please note that per the Exemption provisions of the C/CAG policy, Brisbane continues to have an obligation to provide written notification to C/CAG whenever it receives an application for a new development project expected to generate more than 100 ADT and is also required to share all monitoring results with C/CAG and Commute.org on a biennial basis.

Thank you for your patience during the intervening months as we have worked with our Board to implement necessary amendments to the exemption provisions of C/CAG’s TDM policy to accommodate requests such as yours. Brisbane is to be commended for its efforts in adopting and implementing these strong TDM policies.

Please let me know if you have any questions regarding this matter.

Sincerely,

Sean Charpentier, C/CAG Executive Director