



Transportation Demand Management Policy 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 dated September 9, 2021, which has been adopted as part of the San Mateo County Congestion Management Program (CMP). This guidance document describes the process, as well as agency roles and responsibilities to put the TDM Policy into action.. 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* addresses the following:

1. Determining whether a project meets the average daily traffic (ADT) project review threshold for compliance with the *C/CAG TDM Policy*
2. Developing a Compliant TDM Program
3. Understanding the Monitoring & reporting requirements
4. Local Jurisdiction exemption process
5. Step-by-step TDM Policy implementation process
6. Process flowchart

Project Review Threshold (ADT)

Unless a member jurisdiction has been exempted from the C/CAG TDM Policy according to the process described in this document, any new development project anticipated to generate at least 100 average daily trips (ADT) is subject to the TDM Policy and must therefore complete a TDM Checklist and implement associated measures to mitigate traffic impacts.

The C/CAG TDM Policy includes a tiered approach based on land use type and project size. The land use categories include: Non-Residential (office, industrial, institution), Non-Residential (medical and lodging), Non-Residential (retail), and Residential (multi-family), with distinct thresholds for “small” and “large” projects.

Determining Project ADT

Traditionally, trip generation methods have been most prominently documented in the ITE *Trip Generation Manual*. However, flexibility in choice of ADT calculation method is allowed. These methods may include, but are 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.

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, ADT is to be calculated by combining the trip generation of the various uses.

The following table shows an approximate range for project sizes that will likely meet or surpass the 100 ADT threshold:

ADT Thresholds, Correlated with Approximate Project Size Characteristic^{1 2}

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

Implementing TDM Measures

All projects subject to the C/CAG TDM Policy shall implement a set of TDM measures identified in one of the following TDM Checklists, based on land use and ADT:

- Large Non-Residential (Office, Industrial, Institutional)
- Small Non-Residential (Office, Industrial, Institutional)
- Large Residential
- Small Residential
- Large Non-Residential (Medical/Lodging)
- Small Non-Residential (Medical/Lodging)
- Large Non-Residential (Retail)
- Small Non-Residential (Retail)

(Note that for Mixed Use projects, the land use type that generates the majority of ADT, as determined in the previous section, will define the TDM checklist that should be utilized, but the combined ADT of all the uses will determine whether the project is defined as “small” or “large”.)

Applicants shall select all “Required” TDM measures and enough “Additional Recommended” measures within the Checklist 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. Transit-Oriented Development (TOD) projects within 0.5 miles of MTC-defined “high-quality transit” and small multi-family residential projects have a minimum 25% trip reduction.

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. Some measures will only be required of projects meeting one of the above three geographic criteria. The categories are:

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.

Importantly, the distances cited above for each category shall be measured along the traversable pathway between the project site and the nearest stop or station with “high-quality transit”. In other words, this measurement should *not* be “as the crow flies”. The same measurement method shall apply to all project categories.

Completing/Submitting the TDM Checklist

To facilitate implementation of the C/CAG TDM Policy, as well as for future TDM monitoring and data collection, project sponsors will be required to submit a TDM Checklist with their development application to the governing jurisdiction Planning Department, as part of the development review process. At the beginning of the CEQA process, or within 10 days of receipt of an application that meets the ADT threshold, the local jurisdiction will notify C/CAG. Such notice is to include a brief project description (land use type, size, location), and acknowledgement that the project will be subject to these TDM Policy Requirements.

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. Such

review includes ensuring use of the appropriate Checklist (i.e., Small/Large, Non-Residential/Residential), and verifying that all “Required” measures are included, as well as sufficient additional “Recommended” measures to collectively achieve the target trip reduction percentage for the project type (25% or 35%). If needed, 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, the project proceeds through the jurisdiction’s standard review process. If approved, the project is to be conditioned upon approval of both implementation of the selected measures in the Checklist and on-going monitoring and reporting requirements, as outlined in the following section. Then, at the conclusion of the development review process, the local jurisdiction staff forwards the final approved Checklist to C/CAG.

Monitoring & Reporting

Monitoring and reporting the status of TDM implementation 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. As discussed below, efforts have been made to minimize, to the extent possible, local jurisdiction involvement in related monitoring and enforcement activities. *(Please refer to the C/CAG TDM Policy Update Approach document for discussion of thresholds that qualify projects for this level of review).*

Periodic Project Tenant Surveying

Upon completion and occupancy (full or partial) of a new development project, 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.

Two years after initial occupancy the tenant, property owner or other responsible party will self-certify that the TDM Measures chosen during project approval and included in the entitlement by the jurisdiction, are being implemented. Every two years thereafter for the initial six years, the tenant/property owner will again self-certify that required TDM measures continue to be implemented and will also survey their employees. Thereafter this review will occur triennially until post-occupancy year 20. Large multi-family residential projects are required to participate in TDM self-certification for the first six years of occupancy; after the sixth year of occupancy, no additional reporting is required. No reporting is required for small residential projects.

The TDM self-certification form and surveys will be provided by C/CAG and/or its designee, Commute.org.

Commute.org will prescribe a timeline during which the survey participants may gather requisite data, complete the survey, and return the 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 or to submit required TDM employee surveys. Resolution will likely require local jurisdiction support and involvement with the project developer or tenant, as compliance is ultimately a condition of the development approval. Consequently, 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. The local jurisdiction may, on a case-by-case basis, invite Commute.org to assist issue resolution.

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 C/CAG 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 these requirements.

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 the local jurisdiction to document how their locally adopted travel demand metric will sufficiently mitigate traffic impacts on the CMP Network.

The local jurisdiction shall submit such a request in writing to C/CAG. The request must clearly document how their 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 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 would not apply on a project-by-project basis.

Step-by-Step TDM Policy Implementation Process

This section describes each procedural step that needs to be followed by project applicants and the C/CAG member jurisdiction where their project is located, in order to effectively implement the C/CAG TDM Policy.

There are four (4) major procedural steps listed below, followed by more detailed explanation for each step:

1. TDM Policy Determination
2. Predevelopment Review
3. Development Review
4. Monitoring & Reporting

Step 1. TDM Policy Determination

The first action a local jurisdiction must take is to ascertain whether the TDM Policy applies to them or not (i.e., exemption). All C/CAG member jurisdictions are subject to the countywide TDM Policy *unless* they explicitly receive an exemption per the process explained above.

If a local jurisdiction is determined to be exempt by C/CAG, the jurisdiction must still notify C/CAG in writing when a new development project estimated to generate more than 100 ADT is submitted for review. If a local jurisdiction is not exempt it must comply with the C/CAG TDM Policy. For ease of implementation it is recommended that each non-exempt jurisdiction incorporate these requirements either directly or by reference into its municipal code.

Step 2. Predevelopment Review

During predevelopment review, the local jurisdiction should advise prospective project applicants that are likely to meet the policy threshold (100 ADT) of the C/CAG TDM Policy requirements, and to advise of associated online information at <https://ccagtdm.org>, as well as assistance that is available from Commute.org and/or C/CAG staff.

Step 3. Development Review

Upon receipt of a development project application meeting the C/CAG TDM Policy threshold, the jurisdiction, as part of its overall application completeness review, will check the adequacy/completeness of the submitted TDM Checklist. This should include verifying that the applicant has selected the correct Checklist (project size, land use type) and committed to all Required TDM measures as well as any Additional Recommended measures needed to collectively achieve the target trip reduction percentage for the project type (25% or 35%).

Once the local jurisdiction has confirmed the application is complete, the local jurisdiction will notify C/CAG. Such notice is to include a brief project description (land use type, size, location), and acknowledgement that the project will be subject to these TDM Policy Requirements. Alternatively, the local jurisdiction can forward the submitted TDM Checklist. C/CAG will not conduct further development review; it will simply file the notice and/or Checklist for administrative proof of record and future monitoring and reporting purposes.

As part of its approval, the local jurisdiction is to condition project approval (COA) on implementation of all TDM measures selected by the applicant in their submitted Checklist as well as the corresponding monitoring and reporting requirements. Once approved, the final TDM Checklist should be forwarded to C/CAG. Local jurisdictions are also responsible to ensure that any site design related TDM measures (ex. showers and locker facilities, bus pull-outs, etc.) are incorporated into final design plans prior to issuance of building permits.

Step 4. Monitoring & Reporting

This step effectively begins once the new development project is approved by the local jurisdiction. While projects project will have different TDM implementation schedules, it is nonetheless assumed there will be progress toward implementing the TDM measures that have been conditioned with project approval.

Two (2) years after project occupancy, Commute.org will distribute a survey to the appropriate project point of contact, who may be the original project owner, property manager, or on-site tenant(s)/TDM coordinator(s). The survey will consist of a TDM Self-Certification Form (i.e., self-reporting implemented TDM measures) along with brief questionnaire about user travel behavior at the project site.

Commute.org will then collect and analyze these surveys. If there is insufficient progress towards TDM Checklist implementation, Commute.org will work with the appropriate point of contact to develop potential solutions. The local jurisdiction shall also collaborate in this issue resolution, which may include potential enforcement.

During this fourth and final procedural step, the biennial surveying process will repeat at affected projects for a duration prescribed in the companion *Policy Approach* document.

TDM Policy Process Flowchart

To illustrate the procedural sequence of events described in the previous section, a process flowchart is provided on the next page. As described throughout the *Implementation Guide*, the TDM Policy implementation process is a collaborative one - it relies on frequent data sharing and communication between local jurisdictions, project tenants, C/CAG, and Commute.org.

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.

