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Sent: Monday, May 4, 2026 10:29 PM
To: , Public Works <public.works@mountainview.gov>
Cc: Hicks, Alison <Alison.Hicks@mountainview.gov>; McAlister, John <John.McAlister@mountainview.gov>; Kamei, Ellen <Ellen.Kamei@mountainview.gov>
Subject: Public comment on CTC Item 5.1: TDM Ordinance



Re: [Agenda item 5.1](#)

Dear Chair Hicks and Members of the Council Transportation Committee,

Mountain View YIMBY supports work on a Citywide TDM Ordinance. A standardized framework with a parking exemption pathway for residential projects is a significant step forward from the current ad hoc, project-by-project approach. We appreciate the exemptions for residential trip caps, travel surveys, and driveway counts, and the decision to keep TMA membership optional given Prop 218 concerns identified.

We appreciate some of the changes made since the EPC meeting, including allowing projects to receive credit for limiting parking supply when they also unbundle parking costs and introducing additional core strategies, though the draft does not give details.

ADT Reduction Targets / Numerical Requirements

We appreciate the smaller ADT reduction targets for TOD projects, as proximity to transit encourages fewer single-occupant vehicle (SOV) trips. However, we are concerned that the targets for residential projects, particularly for non-TOD residential projects (30/40/50% for S/M/L), are still high. We would like to see concrete analysis rather than just peer jurisdiction benchmarking and references to Precise Plan targets. To incentivize new large residential developments, as new density is inherently critical for reducing SOV trips and city vehicle-miles-

traveled (VMT), we recommend lowering the reduction targets, until the cost to development has been studied.

The separate requirement of choosing Auxiliary Strategies in proportion to project size also seems to lack evidence of effectiveness or cost vs. benefit, especially since the strategies range in effort. We request that staff either provide evidence or reduce/eliminate the number.

Parking Reduction

Reducing car parking is one of the most important strategies to reduce SOV trips in new projects, and one of the hardest to do post-construction. While the proposed TDM program does encourage reducing parking and allow projects to receive exemptions to parking minima, we recommend further changes to maximize the impact of the TDM program.

The lack of scaling in the parking reduction program, as called out by EPC, means projects that reduce their parking to near-zero will receive no more credit than a project that goes slightly under the standards in the ITE Parking Generation Manual. Projects should receive more credit for supplying (near-)zero car parking than a flat 10%; such projects should meet the ordinance without having to implement any other major strategies.

For the “Limit Parking Supply” item, we are still concerned about the requirement for adjacent street parking to be metered/permitted. Although it is true that limiting parking supply is *less* effective when there is free street parking nearby, that does not mean that it is ineffective. Furthermore, a new development does not control whether street parking is free or not. While we would urge the City to properly regulate the availability of street parking adjacent to new developments, we do not believe that a developer’s ability to use this program should be contingent on the City taking action first.

Parking Reduction for Small Projects

We would encourage the city to provide some pathway such that small residential projects (under 200 ADT) can receive a parking exemption if they meet some enhanced TDM criteria, even though they would not be required to participate in the TDM program at all normally.

Monitoring

Residential projects are exempt from travel surveys and traffic counts, which is a meaningful distinction from nonresidential. However, medium and large residential projects are required to

submit annual TDM Reports for at least a decade, which is quite a long compliance period for a housing project. We ask that residential monitoring be capped at 5 years for all project sizes in order to see TDM strategies to maturity. Continued reporting may produce excessive administrative burden without enough benefit to the city or community.

Compatibility with State Law

Many new housing projects will qualify for state laws that require review only against objective standards, including AB 130 ministerial review (toward which the City is already working). The ordinance should include explicit language confirming that TDM compliance is satisfied by adopting a qualifying TDM Plan from the Toolkit without additional discretion.

Thank you for your consideration.

James Kuszmaul, on behalf of Mountain View YIMBY