





Transportation Demand Management (TDM) Plan

Multifamily Development at 2700 West El Camino Real in Mountain View, CA

Prepared for:

SummerHill Apartment Communities

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1. Introduction and Project Description

Transportation Demand Management (TDM) is a combination of services, incentives, facilities, and actions that reduce single-occupant vehicle (SOV) trips to help relieve traffic congestion, parking demand, and air pollution problems. The purpose of TDM is to reduce the number of trips generated by new development; promote more efficient utilization of existing transportation facilities, and ensure that new developments are designed to maximize the potential for sustainable transportation usage. This TDM Plan has been prepared for the multifamily development at 2700 West El Camino Real in Mountain View, California, in order to propose effective and appropriate TDM measures, based on the project's size, location, and land use.

Based on the site plan dated October 19, 2016, The 2.28-acre parcel site is currently developed with a 9,600-square foot restaurant, and a 98-room motel. The project would demolish the existing on-site structures and construct a five-story apartment building with 211 units, 2000 s.f. of neighborhood commecial space and a two-level below-grade parking garage. Vehicular access to the below-grade garage would be provided via a driveway on Del Medio Avenue. The project site location and the surrounding study area are shown on Figure 1. The site plan is shown in Figure 2.

The project is categorized as a Tier 1 development in the Medium Intensity Corridor covered by the EI Camino Real Precise Plan (ECRPP). The City of Mountain View requires a TDM Plan for all new Tier 1 development projects within the EI Camino Real Precise Plan (ECRPP) Area to achieve a trip reduction goal consistent with the percentage for new employment generation development in the City's Greenhouse Gas Reduction Program (GGRP). For new employment development along EI Camino Real/San Antonio area, the GGRP requires a 4 percent reduction in peak hour drive-alone commute trips. The ECRPP also requires projects to provide transit subsidies and/or take part in VTA's Eco Pass program (or equivalent).

This TDM Plan addresses the requirements of the El Camino Real Precise Plan and includes a broad range of TDM measures designed to reduce the trips and Vehicle Miles Traveled by residents of the multifamily development. This Plan includes a transit subsidy program for residents consisting of the VTA Eco Pass program for the first two years of project occupancy and for each resident's first year of residency for the first five years of project occupancy. The goal of this TDM Plan is to exceed the 4% trip reduction target established in the El Camino Real Precise Plan.

Report Organization

The remainder of this report is divided into two chapters. Chapter 2 describes the transportation facilities and services in the vicinity of the project site. Chapter 3 presents the TDM measures that will be implemented for the proposed project, including the program for implementing and monitoring the TDM plan.









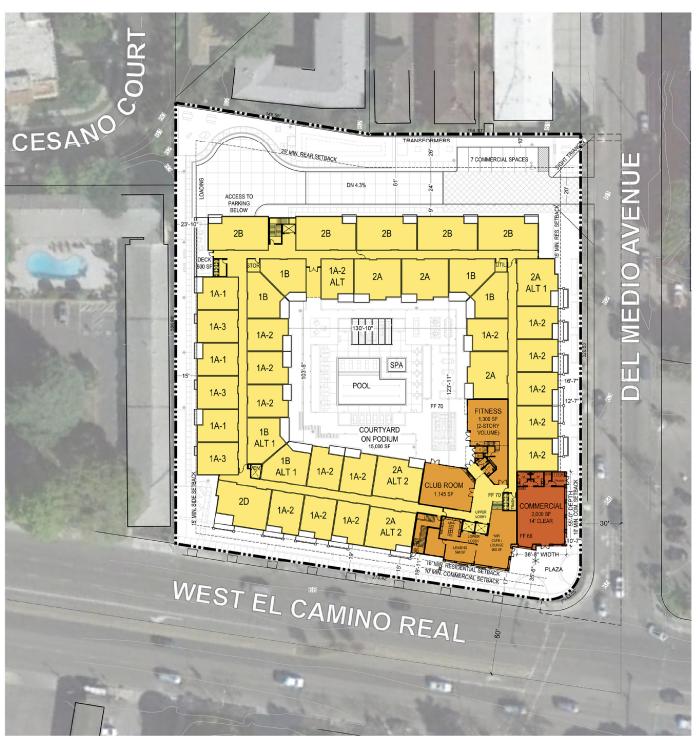




Figure 2 Site Plan





2.

Transportation Setting

Transportation facilities and services that support sustainable modes of transportation include VTA bus routes, Caltrain, shuttles, pedestrian facilities, and bicycle facilities. This chapter describes the existing facilities and services near the 2700 West El Camino Real site. Information on the nearby roadway network is also included in order to provide a more comprehensive description of the nearby transportation network.

Roadway Network

Regional access to the project site is provided by US 101, SR 237, SR 85, SR 82 (El Camino Real) and Central Expressway/Alma Street. Local access to the project site is provided via San Antonio Road, California Street, Del Medio Avenue, Miller Avenue, and Fayette Drive.

US 101 is a north-south freeway that extends through and beyond the Bay Area, connecting San Francisco to San Jose. US 101 is eight lanes wide (three mixed-flow lanes and one HOV lane in each direction) in the vicinity of the project site. US 101 provides site access via a partial interchange at San Antonio Road.

SR 237 is a four to six-lane freeway in the vicinity of the project site that extends from El Camino Real (SR 82) in the west to I-880 in Milpitas in the east. SR 237 provides access to the project study area via US 101 and El Camino Real.

SR 85 is a six-lane freeway in the vicinity of the project site that extends from US 101 in Mountain View to US 101 in San Jose. SR 85 has a full interchange at El Camino Real and partial interchanges at Central Expressway, Evelyn Avenue, and Moffett Boulevard

El Camino Real (SR 82) is a six-lane roadway that serves as a north-south route of travel, but is aligned in a predominantly east-west orientation in the vicinity of the site. El Camino Real extends westward and then northward to San Francisco and eastward then southward to San Jose. El Camino Real has a raised, landscaped median with left-turn pockets provided at intersections. El Camino Real provides access to and from the project site via Del Medio Avenue.

Central Expressway/Alma Street is a four-lane roadway that is aligned in an east-west orientation in the vicinity of the site and includes an interchange at San Antonio Road. East of San Antonio Road, Central Expressway is part of the expressway system operated by the Santa Clara County Department of Roads and Airports. West of San Antonio Road, this roadway becomes Alma Street and is not part of the County expressway system. The Caltrain tracks run parallel to Central Expressway/Alma Street in the study area.



San Antonio Road is a six-lane roadway north of El Camino Real and a four-lane roadway south of El Camino Real. It is aligned in a mostly north-south orientation in the vicinity of the site. San Antonio Road extends northward from Foothill Expressway to U.S. 101.

California Street is a four-lane roadway aligned in a mostly east-west orientation in the vicinity of the site. California Street extends east-west between Del Medio Avenue and Bush Street in downtown Mountain View.

Del Medio Avenue is a north-south two lane residential roadway that begins at its intersection with El Camino Real and extends north where it terminates just south of Central Expressway. Del Medio Avenue would provide direct access to the project site.

Miller Avenue is an east-west two lane roadway between Monroe Drive and San Antonio Road, with an offset intersection at Del Medio Avenue.

Fayette Drive is an east-west two lane roadway between Del Medio Avenue and San Antonio Road.

Transit Service

The project site is well-served by transit. Existing transit service to the study area is provided by VTA, Caltrain and the Marguerite shuttle operated by Stanford University. The transit services are described below and shown on Figure 3.

VTA Bus Service

The San Antonio Transit Center, a major bus stop served by six different bus routes, is located approximately 0.6 mile east of the project site on Showers Drive. The closest bus service to the site is located at the intersection of El Camino Real and Cesano (Route 22) and across the street from the project site along El Camino Real (Route 22).

Local Route 22 operates on El Camino Real in the project vicinity, providing service between the Eastridge Transit Center and Palo Alto Transit Center 24-hours a day, with 10 to 15-minute headways from approximately 6:00 AM until 7:00 PM, with 20-25 minute headways until midnight, and one hour headways during the "owl" service hours.

Community Route 32 provides service between the San Antonio Shopping Center and the Santa Clara Transit Center via San Antonio Road and Middlefield Road, with 30-minute headways during both commute and midday hours, between approximately 6:00 AM and 8:00 PM.

Community Route 34 provides service between the San Antonio Shopping Center and Downtown Mountain View via San Antonio Road and California Street, with 60-minute headways during midday hours.

Local Route 35 provides service between the Stanford Shopping Center and Downtown Mountain View via Middlefield Road, San Antonio Road and California Street, with 30-minute headways during both commute and midday hours and 60-minute headways in the evening.

Local Route 40 provides service between La Avenida/Inigo Way (in the North Bayshore area of Mountain View) and Foothill College via Rengstorff Avenue, California Street, Showers Drive, El Camino Real, and San Antonio Road, with approximately 30-minute headways during both commute and midday hours and 60-minute headways in the evenings..

Rapid Route 522 operates on El Camino Real in the project vicinity, providing service between the Eastridge Transit Center and the Palo Alto Transit Center between 5:15 AM and 10:30 PM, with 15-minute headways during both commute and midday hours and 30-minute headways in the evenings. Unlike the local and community bus routes, this is an express service with limited stops. Route 522 stops at El Camino Real and Showers Drive, less than ½ mile from the project site.



Caltrain

The San Antonio Caltrain Station is located approximately three-fourth of a mile (about 3850 feet) northeast of the closest corner of the project site (San Antonio Road and Miller Avenue). Caltrain provides frequent passenger train service between San Jose and San Francisco seven days a week. During commute hours, Caltrain provides extended service to Morgan Hill and Gilroy. Trains that stop at the San Antonio Station operate at approximately 60 minute headways in both directions during the commute hours, with somewhat more frequent service in the midday. Service operates between about 5:00 AM and 11:00 PM in the northbound direction and between 6:00 AM and 1:00 AM in the southbound direction. Caltrain's Baby Bullet express service does not stop at San Antonio Station.

Bicycles are permitted on Caltrain. There are bicycle racks and bicycle lockers available at the San Antonio Station, and a Bike Share station has been placed there. The project site is within easy biking distance of the Caltrain station, and residents could ride bikes to the station without using any major roads.

Stanford Marguerite Shuttle

The Marguerite shuttle is Stanford University's free public shuttle service, which travels around campus and connects to nearby transit, shopping, dining, and entertainment. In the vicinity of the project site, the Marguerite shuttle operates the Shopping Express (SE) route on El Camino Real from campus to the San Antonio Center. The shuttle operates from mid-September to mid-June between 3:00 PM and 10:30 PM on weekdays and between 9:30 AM to 11:00 PM on weekends, with 50 to 60-minute headways. During the summer and the winter campus closure, the Shopping Express Special operates from 10:30 AM to 11:00 PM on 2-hour headways. The bus stops closest to the project site is at Showers/Latham, approximately 1,750 feet from the project site.

Pedestrian and Bicycle Facilities

According to the Valley Transportation Agency (VTA) Santa Clara Valley Bikeways Map and the City of Mountain View Bike Map (2010), there are several designated bikeways in the vicinity of the project site (see Figure 4).

- California Street has Class II bicycle lanes (defined as on-street striped bike lanes) from Castro Street in the east to Del Medio Avenue in the west. California Avenue provides bicycle access from the project site to downtown Mountain View.
- Showers Drive has Class II bicycle lanes along its entirety, and provides access to the San Antonio Caltrain Station.
- **Miller Avenue** is classified as a bike route from Del Medio Avenue in the east to the Adobe Creek Bicycle Bridge (a Class I bicycle and pedestrian bridge) in the west. After crossing the bridge, this bike route continues on Wilkie Way in Palo Alto to Charleston Road. This bike route functions as an extension of the bike lanes on California Street.
- San Antonio Road has Class II bicycle lanes from Foothill Expressway (to the south in Los Altos) to El Camino Real. San Antonio Road north of El Camino Real is not currently designated as a bikeway on the City of Mountain View Bike Map.

The Mountain View Bicycle Transportation Plan Update, adopted on November 17, 2015, includes the addition of Class II bike lanes on San Antonio Road between El Camino Real and California Street.

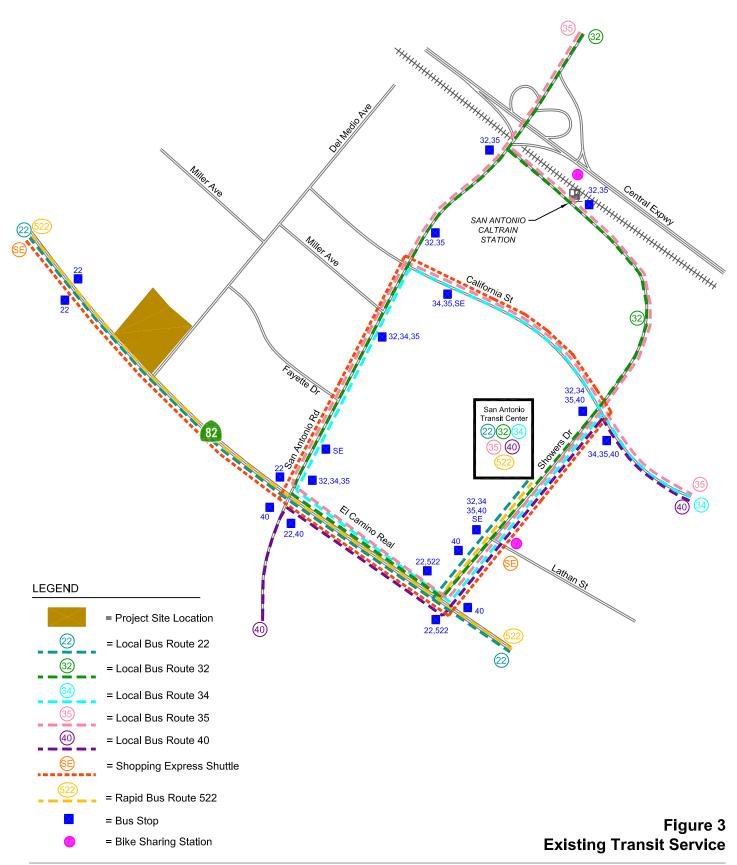
In addition to the bike lanes on California Street and bike route on Miller Avenue, other east-west routes further from the project site are provided by Class II lanes on Middlefield Road and a bike boulevard on Montecito Avenue from Mayfield Avenue to Whisman Road. For north-south travel, there are Class II bike lanes on Rengstorff Avenue and Shoreline Boulevard.



Bay Area Bike Share is a regional public bicycle sharing system where those with a membership can rent a bicycle at Bike Share stations, ride the bicycle, and drop off the bicycle at any other Bike Share station. There is a Bike Share station at San Antonio Center, near the project site.

Pedestrian facilities in the study area consist of sidewalks along all of the surrounding streets. Crosswalks with pedestrian signal heads are located at all of the signalized intersections in the study area. Marked crosswalks are provided at the unsignalized intersections of Del Medio Avenue/Fayette Drive and Del Medio Avenue/California Street, but not at Del Medio Avenue/Miller Avenue, which is an off-set intersection with no stop controls on Del Medio Avenue. There are also sidewalks and crosswalks along the streets that pedestrians would use to walk between the project site and the Caltrain station on Showers Drive. Overall, the existing pedestrian facilities provide adequate connectivity between the site and all of the surrounding land uses in the area.











LEGEND



= Bike Lanes On Street (Class II)

===== = Bike Route (Class III)

= Bike Sharing Station

Figure 4 Existing Bicycle Network





3.

Proposed TDM Measures

The TDM measures to be implemented for the 2700 West El Camino Real multifamily project includes design features, programs, and services that promote sustainable modes of transportation and reduce the roadway and parking demand that would be generated by the project. For a Tier 1 residential development project located in the El Camino Real Precise Plan area, the City requires a TDM plan including a transit subsidies program. The goal of this TDM Plan is to reduce the overall trips generated by the development by 4 percent. Post occupancy, it is recommended that the development submit an annual TDM Performance Report to the City that identifies the TDM measures implemented during the year and estimates by how much trips were reduced, compared to standard ITE rates. Table 1 presents a summary of the measures proposed in this plan, along with an indication of who will have primary responsibility for implementing each measure. The project site is well-suited to have a successful TDM Plan, based on its location near other retail and commercial development and its quality access to bicycle, pedestrian, and transit facilities.

TDM Administration and Promotion

Designated Transportation Coordinator

Experience with other TDM programs indicates that having a Transportation Coordinator who focuses on transportation issues and is responsible for implementing and managing the TDM program is key to its success. The building owner or management will need to appoint an individual as the Transportation Coordinator or TDM contact person, and that person's name and contact information will be provided to the City.

The Transportation Coordinator's responsibilities will include organizing and implementing the promotional programs, updating information on the online information board/kiosk, providing trip planning assistance and/or ride-matching assistance to residents who are considering an alternative mode for their commute, providing information about the subsidized mode programs (including transit, zip car, and bike share), and managing the annual driveway counts. The Transportation Coordinator should maintain a supply of up-to-date transit schedules and route maps for VTA and Caltrain and be knowledgeable enough to answer resident's TDM program-related questions.



Table 1
Proposed TDM Measures for 2700 West El Camino Real

TDM Measure	Implementation Responsibility
Bicycle and Pedestrian Facilities	
Bicycle Parking	Building Developer
Resources (maps & info)	Trans.Coordinator
Carpool and Vanpool Programs	
On-site Ridematching Assistance	Trans. Coordinator
511 Ridematching Assistance	Available to public
Carpool/Vanpool Incentives for New Users	Available to public
Transit Elements	
Offer VTA Eco-Pass to all Residents for 2 years	Trans.Coordinator
Offer VTA Eco-Passes to new Residents for 5 years	Trans.Coordinator
Online Info Center	
"Online Kiosk": website with info	Building Developer ¹
Info Packets for New Residents	Trans.Coordinator
Program Marketing, Administration, Monitoring and Reporting	
Transportation Coordinator	Building Developer ¹
Event promotions & publications	Trans. Coordinator
Resident Surveys	Trans. Coordinator
Annual count of vehicles entering and leaving site	Trans. Coordinator
Annual reporting to City	Trans. Coordinator
Internet and Telecommuting ²	
WiFi lounge area to facilitate telecommuting	Building Developer
Wiring for high speed internet service to facilitate telecommuting	Building Developer
Carshare Programs	
Two parking spaces reserved for carshare service	Building Developer/Tenant(s)

- 1. The building developer will have initial responsibility for appointing the Transportation Coordinator. The Transportation Coordinator will have ongoing responsibility for the online kiosk and various program elements.
- 2. The building developer should provide at least one of these internet and telecommuting programs.

Promotional Programs

The Transportation Coordinator will need to undertake additional marketing activities to encourage residents to try an alternative mode to get to work. Although some marketing, such as the online kiosk and distributing information welcome packets to new residents, will be conducted immediately, additional promotional activities might include email blasts of flyers, brochures or other materials on commute alternatives, ridesharing incentive programs, and transit benefits. VTA.org and 511.org can help provide some useful marketing materials.



Bicycle and Pedestrian Facilities

The site has quality access to bicycle and pedestrian within the vicinity of the project site. The existing sidewalks and pedestrian paths have good connectivity and would provide pedestrians with safe routes to all of the surrounding land uses in the area, including the Village at San Antonio shopping center, the San Antonio Transit Center on Showers Drive, the San Antonio Caltrain station, and the bus stops on El Camino Real. It is expected that bicycle facilities that are included as part of the project will be successful in reducing vehicle trips.

Bicycle Parking

Providing secure bicycle parking encourages bicycle commuting and reduces daily vehicle trips. Based on the City of Mountain View bicycle parking requirements, the project should provide a total of 233 bicycle parking spaces, including 211 long-term spaces for the residents, 21 spaces for residential guests, and 1 space for the commercial space. This is based on one long-term space per unit for residents, one space per ten units for guests and one space per twenty required vehicular parking spaces for commercial space. According to the site plan dated 10/19/2016, the project is proposing a total of 233 bicycle parking spaces, which meets the City's requirement.



Bicycle Resources

As part of the information available in the "online kiosk" discussed in more detail below, resources useful to cyclists will be included. For example, the local bikeways map will be posted for easy reference. A map showing the safe routes to the public elementary school, middle school, and high school that would serve the site's families would also be posted.

The following resources are available to bicycle commuters through 511.org. These resources will be noted on the project's online information center, in order to make tenants aware of them.

- Free Bike Buddy matching
- Bicycle maps
- Bicycle safety tips
- Information about taking bikes on public transit
- Location and use of bike parking at transit stations
- Information on Bike to Work Day
- Tips on selecting a bike, commute gear, and clothing
- Links to bicycle organizations



Bike Sharing Station

The Bay Area Bikeshare program is a network of unique commuter-style bikes that can be checked out from and returned to self-service bike share stations for short trips. The idea behind bike sharing is to make bikes availabe to transit and carshare users for the short journey between a transit station and their destination. There are two Bay Area Bike Share stations within a half mile of the project, one at the intersection of Showers Drive and Latham Street and one at the San Antonio Caltrain Station.

Carpool and Vanpool Programs

On-Site Ride Matching Assistance

The Transportation Coordinator will provide a web portal for use by tenants in finding other residents who may be able to carpool together. Information about this web portal will be provided to all apartment residents as part of the New Resident Information packets. Some residents who may be reluctant to reach out to find carpool partners via the 511 RideMatch service may be more likely to use a service that will be administered by their Transportation Coordinator.

511 Ride Matching Assistance

The 511 RideMatch service provides an interactive, on-demand system that helps commuters find carpools, vanpools or bicycle partners. This program will be promoted through the online information center and in New Resident Information packets.

This free car and vanpool ride-matching service helps commuters find others with similar routes and travel patterns with whom they may share a ride. Registered users are provided with a list of other commuters near their employment or residential Zip code along with the closest cross street, email, phone number, and hours they are available to commute to and from work. Participants are then able to select and contact others with whom they wish to commute.

The service also provides a list of existing carpools and vanpools in their residential area that may have vacancies. Ride-matching assistance is also available through a number of peer-to-peer matching programs, such as Zimride and TwoGo, which utilize social networks to match commuters.



Carpool/Vanpool Incentives for New Users

The 511 Regional Rideshare Program offers a number of incentive programs to encourage people to try carpooling and vanpooling. Most of these programs are designed to reward someone for forming or trying a carpool or vanpool, and provide an award or subsidy after the first three or six months of use.

- Vanpool Formation Incentive: The 511 Regional Rideshare Program provides up to \$500 in gas
 cards to new vanpools that meet certain eligibility requirements and complete three to six consecutive
 months of operation. The gas cards are awarded on a first-come, first-served basis, until funds are
 exhausted.
- Vanpool Seat Subsidy: The 511 Regional Rideshare Program also offers a vanpool seat subsidy in the form of gas cards. The seat subsidy will provide \$100 per month, with a limit of three months per van during the program year, to help cover the fare of a lost participant. The gas cards will be offered to eligible vans on a first-come, first-served basis until the funds are exhausted.
- Discounted Tolls: The 511 Regional Rideshare Program offers free toll passage on seven of the Bay Area's bridges for vanpools with 11-15 people who register with 511. Additionally, the program also offers toll discounts to carpools with three or more people (two people in a two-seat vehicle) on eight of the Bay Area's bridges during peak commute hours. The discounts vary per bridge, but typically are half of the standard toll price. For example, the San Mateo Hayward Bridge has a standard toll



of \$5, but for a carpool of three people (two people in a two-seat vehicle) the toll is only \$2.50 Monday through Friday between 5-10 AM and 3-7 PM.

Transit Elements

The project will offer VTA Eco Passes to all residents for the first two years after occupancy begins and to all new residents for one year for the first five years after occupancy begins.

Transit Subsidy for Residents

The project will offer VTA Eco Passes to all residents for the first two years of project occupancy. In addition, the project will offer a one-year Eco Pass to new residents who begin occupancy within five years after occupancy begins at the project. The Eco Pass would allow a resident unlimited rides on VTA buses and light rail, including 12 VTA Express bus lines. According to the VTA website, the annual price of an Eco Pass in areas that are served by bus only is \$36.00 per resident, if there are 100 - 2,999 residents at a specific site. The number of future residents of this project can be estimated based on the number of studio, 1-bedroom, 2-bedroom, and 3-bedroom apartment units it would include. Hexagon estimates that there would be approximately 383 residents at the project, which would result in an annual cost of approximately \$13,788 per year for the Eco Pass program. Actual expenses will vary depending on the number of residents at the project each month during the first two years.

Marketing Program for Alternative Travel Modes

"Online Kiosk": An Online Information Center

Most TDM plans have traditionally included a requirement for a kiosk or bulletin board to be created for posting information related to alternative travel modes. Experience often shows, however, that few residents look at these kiosks after an initial period of interest. This TDM Plan proposes to establish an "online kiosk" with similar information that a resident could access from their home, their workplace, or anywhere else.

A key element of this TDM plan is to set up an attractive, up-to-date "online kiosk" with all of the site-specific information about the transportation resources available to residents. We envision a website which will include information about all the measures, services, and facilities discussed in this plan, including:

- A summary of MVgo, VTA and Caltrain services and links to further information about their routes and schedules.
- A summary of the subsidized transit passes offered to all residents.
- A local bikeways map, information about the bike lockers/secure bike storage areas on site and those nearby, and information about the Bay Area Bikeshare program.
- Information about the ridematching service for project tenants and other public ridematching services (e.g., 511.org, Zimride, and TwoGo) and the incentive programs available to carpools and vanpools.
- Information related to the Zipcar program, including benefits and locations within the project's garage and other nearby locations.
- A link to the many other resources available in the Bay Area, such as Dadnab, the 511 Carpool Calculator, the 511 Transit Trip Planner, real-time traffic conditions, etc.

The building developer will have the responsibility to appoint the Transportation Coordinator. The Transportation Coordinator will have responsibility for contracting with someone to initially create the website so that it is up and running as soon as residents move in. More specific information can be added later to reflect any programs specific to certain groups of residents. The Transportation Coordinator will add new



information to the website (or providing it to the website designer) so that the "online kiosk" remains current and informative.

Information Packet for Residents

In addition to the online information center, the Transportation Coordinator will provide "hard copy" information packets to all residents when they first move into the building. Because all information will be available online, this packet need not be a comprehensive stack of paper about all services available, which residents tend to disregard anyway. Instead, the New Resident Packet will provide a quick easy-to-read announcement of the most important features of the TDM program for residents to know about immediately.

In addition, the packets will include a message to residents that their building manager and/or owner values alternative modes of transportation and takes their commitment to supporting alternative transportation options seriously. For example, it would include a flyer announcing the "online kiosk", information about the transit subsidies, subsidies related to other TDM programs, and a ride-matching application.

Internet and Telecommuting

In an effort to decrease the number of trips residents have to make to and from work each week, the developer will provide a Wi-Fi lounge on-site for residents who work from home. This space is meant to encourage telecommuting, whereby residents of the development who typically report to a central office location, will be able to work at home one or more days per week. Successful implementation of a telecommuting program relies both on the access to internet and facilities in the resident's dwelling unit or residential community, and the option to telecommute as determined by their job description and/or employer.

Carshare Programs

One of the major impediments to using transit, bicycling, carpooling, or vanpooling to get to work is residents' need to use a car occasionally for personal or business purposes. Car sharing programs provide individuals with access to a vehicle when they need it at any time of day, so they do not need to drive or own a car of their own. The developer is planning to provide two carsharing vehicle spaces in the project's garage. Having a car sharing program located within the parking garage will provide quick and easy access to these cars for residents of the development.

Program Monitoring and Reporting

A count of the number of vehicles entering and exiting the project's driveways on a typical weekday during the AM and PM peak periods will be conducted annually to determine the number of vehicle trips being generated by the project.

Driveway counts will be used to determine the actual AM and PM peak hour trip generation of the development. This information will be compared with the number of trips estimated for the project by the standard trip generation rates for apartments published by the Institute of Transportation Engineers (ITE).

The Transportation Coordinator will have the primary responsibility for ensuring that the driveway counts are conducted annually. The driveway counts should be conducted for the first five years after occupancy begins and thereafter at the planning director's request. The day of the count will not be disclosed in advance.

The results of the driveway counts will be reported to the City of Mountain View annually, along with an assessment of whether the TDM measures implemented during the preceding year led to a reduction in trips, compared to standard ITE trip generation rates, for the project as a whole. If it is determined that an adequate trip reduction has not been achieved, the report will outline additional measures that may be adopted in the coming year to achieve the goal, along with an implementation schedule. The annual report to the City should also include a brief summary of the TDM measures that were in place during the preceding year, with an explanation of any changes or new programs.

