

DATE: June 10, 2025

TO: Honorable Mayor and City Council

FROM: Ben Pacho, Transportation Planner
Allison Boyer, Assistant Public Works Director

VIA: Jennifer Ng, Public Works Director

TITLE: **Citywide Transportation Demand Management (TDM) Ordinance Update**



STUDY SESSION MEMO

PURPOSE

Review and provide feedback on staff's recommended framework for the Citywide Transportation Demand Management Ordinance and direct staff to proceed with preparing the draft Transportation Demand Management Ordinance to be brought to the Environmental Planning Commission and City Council in late 2025/early 2026.

BACKGROUND

Transportation Demand Management (TDM) is defined as a set of strategies and incentives implemented with new development or redevelopment to reduce drive-alone trips, maximize traveler choices, and facilitate mode-shift to healthy, sustainable transportation options. Successful TDM programs can effectively reduce traffic congestion, improve air quality, advance equitable transportation systems, improve community health, promote urban livability, bolster economic vitality, advance affordable mobility options, and improve access in all areas of the City.

Common TDM measures in Mountain View include:

- Transit passes or subsidies;
- Shuttle services;
- Reduced or shared parking;
- Commuter incentives or parking cash-out;
- Hybrid work schedules;
- Priority vanpool/carpool parking;
- Trip-end facilities for bicyclists (showers, changing rooms, and lockers, etc.); and
- Parking cash-out incentives, parking fees, and unbundled parking.

On [July 10, 2012](#), the City Council adopted the 2030 General Plan. The General Plan includes the following policies to optimize travel by all transportation modes, promote effective use of roadway capacity, as well as reduce Vehicle Miles Traveled (VMT) and greenhouse gas emissions:

- **MOB-8:** Transportation performance measures that help implement larger City goals:
 - **MOB 8.3:** Multi-modal Transportation Monitoring. Monitor the effectiveness of policies to reduce VMT per service population by establishing transportation mode-share targets and periodically comparing travel survey data to established targets.
- **MOB-9:** Achievement of state and regional air quality and greenhouse gas emission reduction targets:
 - **MOB 9.2:** Reduce VMT. Support development and transportation improvements that help reduce greenhouse gas emissions by reducing per-capita VMT.
- **MOB-10:** The most effective use of the City's transportation networks and services:
 - **MOB 10.2:** Reduced travel demand. Promote effective TDM programs for existing and new development.

In August 2012, Council approved the [Greenhouse Gas Reduction Program \(GGRP\)](#). The GGRP aims to implement General Plan Mobility policies, comply with state climate change legislation, and comply with regional Bay Area Air Quality Management District (BAAQMD) guidelines. Since transportation-related emissions account for nearly 60% of emissions Citywide, addressing transportation is a major focus of the City's efforts in relation to the GGRP. The GGRP established:

1. Mandatory commute trip reductions for development projects generating new employment;
2. TDM requirements for new development in certain areas of the City; and
3. Planned actions for reducing greenhouse gas emissions, including Measure T-1.1: Transportation Demand Management, which calls for adoption of a Citywide TDM Ordinance with TDM performance reporting requirements, procedures, and funding mechanisms.

Since 2014, Council has also adopted four Precise Plans—San Antonio Precise Plan (2014), El Camino Real Precise Plan (2014), North Bayshore Precise Plan (2014), and East Whisman Precise Plan (2019)—that establish TDM requirements for each precise planning area.

On [October 22, 2019](#), Council adopted the Sustainability Action Plan 4 (SAP-4), which created a fund to advance sustainability actions, including funding to hire a TDM and Parking Demand Management Analyst, and T6.5: Develop a Citywide TDM Ordinance. The City hired a TDM

Analyst in January 2022, which allowed work to begin on monitoring compliance with existing TDM conditions of approval and developing a Citywide TDM Ordinance.

On June 22, 2021, Council's adopted its Strategic Work Plan for Fiscal Year 2021-23, which included developing a Citywide TDM Ordinance (Ordinance). On [June 13, 2023](#), Council reaffirmed the this item as a Work Plan project for Fiscal Years 2023-25 and categorized development of a Citywide TDM Ordinance as one of the City's highest priorities. The intent of the Ordinance is to build on the demonstrated effectiveness of TDM in Precise Plan areas and apply its practice more consistently and predictably on a Citywide basis.

On February 20, 2023, the City executed a contract with Steer Davies & Gleave, Inc., to provide professional services to support development of a Citywide TDM Ordinance. The project team has undertaken the following tasks:

- Reviewing and analyzing the regulatory context and existing TDM requirements;
- Defining the vision, goals, and principles for the TDM Ordinance;
- Developing a draft framework for the Citywide Ordinance, including analysis of approaches in peer and best-practice cities.
- Engaging an internal Technical Advisory Committee consisting of City staff from Economic Vitality, Planning, Sustainability, Traffic, Transportation, and Land Development.
- Engaging with community members, developers, employers, and property managers, including meetings with the Downtown Business Association on June 13, 2023, Mountain View Chamber of Commerce on June 14, 2023, Mountain View Transportation Management Association (MTMA) Board on May 25, 2023 and May 30, 2024, a community meeting on January 21, 2025, and 14 one-on-one conversations with stakeholders;
- Presenting information and obtaining feedback from the Bicycle/Pedestrian Advisory Committee (BPAC) on October 25, 2023 and January 29, 2025, Environmental Planning Commission (EPC) on November 1, 2023, and February 5, 2025, and Council Transportation Committee (CTC) on January 30, 2024 and March 4, 2025.

ANALYSIS

Existing Regulatory Environment and Requirements

Analysis of existing regulations and requirements highlighted the City's leadership in TDM in relation to specific areas and developments within the City. As shown in Figure 1, at least 27 entitled development projects in Mountain View already have TDM requirements as part of their conditions of approval. These requirements are supported by broad enabling policies including the General Plan, Precise Plans, GGRP, and Sustainability Action Plan in addition to state

laws and regulations. The City's experience in imposing TDM requirements also encompasses a wide range of land uses, including office or commercial development (44%), mixed use (19%), master plan areas (7%), multi-family residential (19%), hotel (7%), and medical facilities (4%).

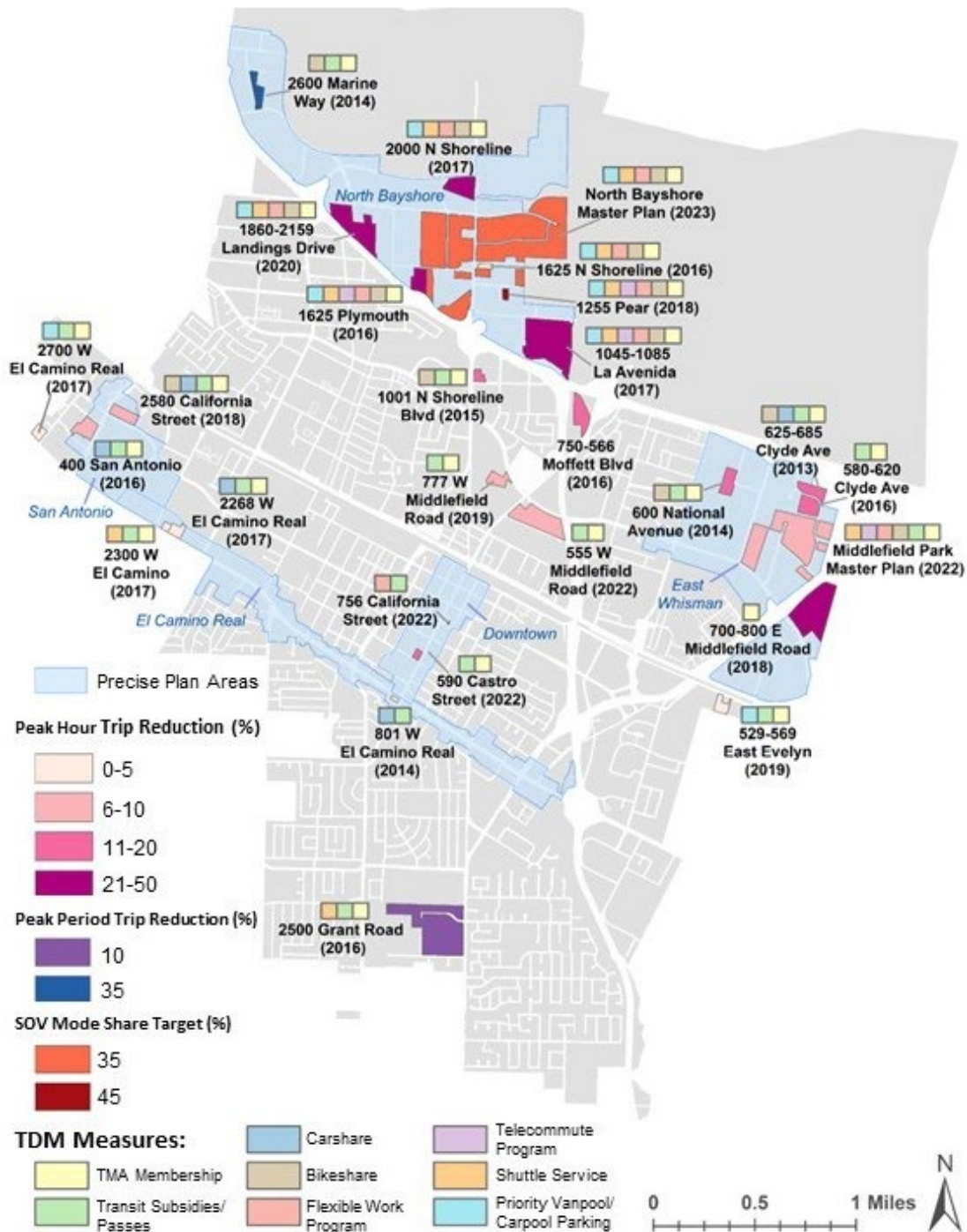


Figure 1: Inventory of TDM Requirements for Recent Developments in Mountain View

The breadth, depth, and content of these individual requirements reflects the City's cutting-edge approach to TDM, which is reinforced by district-wide strategies such as the North Bayshore trip cap and mode-split goals and compliance with recent parking laws. The City has also established robust data collection such as the annual North Bayshore Gateway Trip Cap monitoring efforts. In this way, TDM requirements in certain areas have been a key element of moving toward more sustainable development and access in Mountain View.

Employers, small businesses, and property managers highlight the positive value of TDM requirements in providing mobility benefits to employees or residents and facilitating safe, sustainable, and equitable mobility options. Some employers also indicated that, in addition to the intrinsic benefits of enhancing employee satisfaction, the City's TDM requirements helped their organizations justify ongoing investment in alternative commute programs in Mountain View. Community members at the TDM workshop also highlighted support for TDM strategies such as behavioral incentives, e-bike subsidies, shuttles and micro-transit, along with supportive infrastructure such as bike facilities and bus speed improvements.

On the other hand, the variability in existing TDM requirements (seen in Figure 1) highlights several weaknesses. These weaknesses include a lack of standardization of requirements, lack of clear and detailed guidance on requirements and reporting, and lack of flexibility in terms of TDM strategies needed. Stakeholders indicated that these shortcomings reduce the predictability and transparency of the entitlement process, limit companies' ability to tailor strategies, and increase workload associated with compliance reporting. Lack of standardization also increases City staff time for tracking requirements and potential for pooled delivery of services by the Mountain View Transportation Management Association (MTMA).

Vision, Goals and Principles

The following vision was established to shape the development of the Citywide TDM Ordinance based on Council's original direction as well as the existing conditions analysis and input from community members, stakeholders, BPAC, EPC, and adopted by CTC:

"To reduce single-occupancy vehicle trips for development and increase use of the multi-modal transportation alternatives that are sustainable, equitable, effective, and respond to changing demands."

Additionally, the Ordinance framework was guided by the four guiding principles of predictability, effectiveness, sustainable mobility, and equity as shown in Figure 2.

Operations-Focused Goals		Citywide Benefits-Focused Goals	
Predictable	Effective	Equitable	Sustainable Mobility
<ul style="list-style-type: none"> • Clear, consistent application • Simple, efficient reporting • Implementable requirements 	<ul style="list-style-type: none"> • Stakeholder-supported approaches • Flexible, scaleable strategies 	<ul style="list-style-type: none"> • Expands access to affordable, reliable options for all who live and work in MV 	<ul style="list-style-type: none"> • Reduces VMT, SOV and GHG emissions • Increases multi-modal travel and active transportation

Figure 2: Guiding Principles for Developing the TDM Ordinance

Draft Framework Elements

Staff has developed a draft framework for the Citywide TDM Ordinance based on the above goals and guiding principles as well as existing policies, peer examples, and best practices at the local, regional, and state levels. Additional input was gathered from the project Technical Advisory Committee (TAC) and community members, stakeholders, committees, and Council Transportation Committee (CTC). The draft framework addresses the following seven key questions:

1. Who will be required to comply with the Citywide TDM Ordinance?
2. Which land uses will be subject to the Ordinance?
3. What size of projects will be required to comply?
4. What TDM performance metrics will apply?
5. What trip reduction thresholds will determine compliance?
6. How will TDM requirements be applied?
7. How will TDM implementation be monitored?

While the TDM Ordinance aims to establish requirements that would be imposed on development during the entitlement process, the above questions also consider and address post-occupancy issues to ensure that the requirements are practical, implementable, and enforceable. The project scope for the framework elements is displayed in Figure 3.

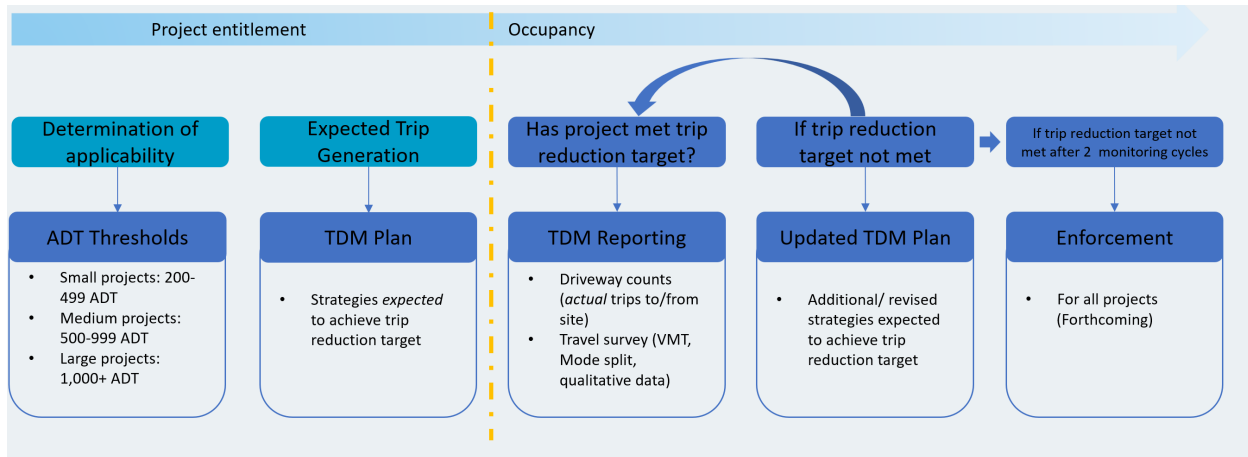


Figure 3: TDM Ordinance Framework Time Frame

Each element of the draft framework is described below along with information the recommendation, intent, and details for each.

1. *Who will be required to comply? (determining applicability)*

The Ordinance will apply to developers as defined below:

Developers: Applicants requesting building permits for new projects, including change of use and renovation projects that are estimated to result in 200 *net new* Average Daily Trips (ADT) or more (see Table 1 for potential land uses).

Applicability of the Ordinance is limited to the entitlement process, whereby property owners seeking building permits or entitlements must receive discretionary approval from the City Council and agree to Conditions of Approval, including TDM requirements.

All TDM requirements will run with the land/property and will be the responsibility of the property owner. Should the property be sold to a new owner, the requirements will transfer with the sale. While TDM requirements can be included in lease agreements between owners and tenants/property managers, noncompliance penalties will ultimately fall on the property owner.

Employers with 50 or more employees who are subject to the [BAAQMD's Commute Benefits Program](#)¹ or [California's Parking Cash-Out Law](#)² may use the Ordinance to support

¹ Bay Area employers with 50 or more full-time employees within the BAAQMD are required to register and offer commuter benefits to their employees in order to comply with Air District Regulation 14, Rule 1, also known as the Bay Area Commuter Benefits Program.

² The California parking cash-out (PCO) law requires employers of 50 persons or more who provide a parking subsidy to employees in any air basin designated as nonattainment to offer a cash allowance instead of a parking space.

their efforts to comply with those requirements. Ordinance thresholds and available strategies are designed to align with those laws.

Existing projects that have been entitled prior to Ordinance adoption will not be subject to the provisions under the Ordinance. However, they will be encouraged to participate on a voluntary basis.

2. ***Which land uses will be subject to the Ordinance?***

All land use types to be covered by the Ordinance.

For projects that are subject to the City's VMT requirements, applicability of the TDM Ordinance shall be consistent with the VMT policy, which aims to appropriately mitigate transportation impacts and operational effects of development, as well as the City's General Plan and GGRP. TDM requirements will vary based on certain criteria, including project size and land use type, discussed later in this Study Session Memorandum.

Applicable land uses were analyzed and selected to best align with categories outlined in the City's VMT policy and Multi-Modal Transportation Analysis (MTA) Handbook. Similar to the MTA Handbook, projects subject to the Ordinance will be reviewed based on screening criteria consistent with the VMT policy as well as more specific trip generation assumptions associated with land use characteristics.

The City's VMT policy is based on SB 743, which does not address all land use types. Consistent with the principles of equity, effectiveness, sustainable mobility, and predictability, the draft Ordinance encompasses all land use types expected to generate transportation impacts and operational effects. Therefore, some projects initially screened out from VMT analysis (due to proximity to transit or an unlisted land use type) may still be required to implement mitigation measures due to exceeding specific trip generation thresholds under the Ordinance.

3. ***What size of projects will be required to comply?***

The Ordinance will apply to projects with anticipated net new ADT which fall into three categories: small (200-499 ADT), medium (500-999 ADT) and large (1,000 ADT and above). Projects that are entitled in phases will have to update existing TDM Plans to incorporate added growth to the development.

These size thresholds align with the City's existing MTA analysis and VMT policy, which is consistent with SB 743 to reduce transportation impacts related to new development. As such, aligning the project size thresholds with these existing policies harmonizes both TDM requirements with required VMT mitigation of average daily trips.

The determination as to whether a project is subject to the Ordinance and the size category (small, medium, or large) shall be based on anticipated daily trip generation. Table 1 also provides the equivalent project size by category for reference purposes, which may be useful in instances when ADT has not been determined as part of an MTA. These are approximations that assume a linear relationship between project size relative to travel demand as well as conversion of Peak-Hour Trips to Average Daily Trips, based on data from the Institute of Transportation Engineers (ITE) Trip Generation Manual.

Table 1: TDM Ordinance Applicability Thresholds and Equivalent Project Size

Land Use Type	Small 200-499 ADT	Medium 500-999 ADT	Large 1,000+ ADT
Multi-Family Residential	30 < units < 75	75 < units < 150	> 150 units
Single-Family Residential	20 < units < 55	55 < units < 105	> 105 units
Retail	< 10,000 ksf	10 < ksf < 20	> 20 ksf
General Office	20 < ksf < 45	45 < ksf < 90	> 90 ksf
Research and Development Center	20 < ksf < 45	45 < ksf < 90	> 90 ksf
General Industrial	40 < ksf < 100	105 < ksf < 205	> 205 ksf
Warehousing	115 < ksf < 290	290 < ksf < 585	> 585 ksf
Other	Threshold would be based on the most similar land use type and determined in agreement with City staff.		

*ksf = thousand square feet

For mixed-use projects, such as residential with a retail component, staff is continuing to research and develop the optimal strategy to achieve Council priorities.

4. ***What TDM performance metrics will apply?***

ADT will be the key performance metric used for assessing transportation impacts related to trip generation. This metric measures the full day of vehicle trips, which are typically dominated by peak-hour trips but also factors in nonpeak trips to give a more accurate metric for broader transportation impacts. The use of a single metric (replacing a past metric rather than burdening property owners with two metrics) reflects feedback from developers and property owners regarding the desire for a single, easy-to-measure metric. Additionally, given the rise in hybrid work arrangements since the COVID pandemic, travel patterns continue to shift beyond typical peak-hour conditions. As such, ADT serves a more comprehensive approach toward achieving reductions in overall VMT and supporting multi-modal transportation.

As with other jurisdictions in the Bay Area, past City requirements in Precise Plan areas require developments to reduce peak-hour trips (PHT). However, recent state laws and local regulations seek to shift away from limited PHT metrics toward ADT metrics that better capture sustainability impacts in addition to traffic congestion concerns. Concerns

with use of PHT as a metric were expressed in relation to the TDM [Policy Approach](#) provided by the City/County Association of Governments (C/CAG) of San Mateo, which states:

“Issues with current policy:

- *Net Peak-Hour Trip Metric:* The 100 or more net peak-hour trips threshold is high and likely excludes many new developments, such as small office buildings, apartment complexes, and condos that could benefit from a TDM Plan.
- *Threshold:* The [PHT] threshold only considers the net change in vehicle trips, which risks omitting certain project types, such as infill or redevelopment projects, that would also benefit from applying TDM strategies.

C/CAG Recommended Metric:

- *Weekday Average Daily Traffic:* Use the projected weekday average daily traffic (ADT) as the threshold for applying TDM requirements.”

In light of these and similar findings, ADT is the recommended metric for draft TDM Ordinance to support analysis of a broader range of project types, which do not fall under the current PHT metric, as well as support Citywide goals of reducing overall traffic congestion.

While PHT as a metric addresses the impacts of traffic and congestion during peak travel times, it reflects a focus on automobile level of service (LOS), which was superseded with Council’s 2020 VMT Policy. PHT fails to capture trips generated outside of peak periods that have become more prevalent in the postpandemic era. Additionally, an emphasis on PHT can incentivize peak spreading without reducing overall regional trip generation and can erode multi-modal travel options such as transit or shuttles. For these reasons, a shift from PHT to ADT can address broader travel demand and help reduce overall VMT while supporting alternative transportation modes.

Use of ADT as the performance metric better supports Citywide goals of sustainability, VMT and emissions reduction, and alignment with existing requirements in the City’s MTA Handbook and VMT policy. Subsequent to the TDM Ordinance adoption, the City may wish to initiate Precise Plan amendments to update TDM requirements consistent with the Ordinance.

5. ***What thresholds (ADT percent reductions) would determine compliance?***

Under the draft TDM Ordinance framework, projects would be required to implement TDM strategies that reduce ADT to the following levels:

- Small projects: 30% ADT reduction relative to ITE trip generation rates.

- Small Transit Oriented Development projects: 20% ADT reduction.
- Medium projects: 40% ADT reduction relative to ITE trip generation rates.
- Medium Transit-Oriented Development projects: 30% ADT reduction
- Large projects: 50% ADT reduction relative to ITE trip generation rates.
- Large Transit-Oriented Development projects: 40% ADT reduction

These thresholds are based on the City's existing Precise Plans targets and informed by case studies of similar TDM programs in San Francisco, San Mateo County, Redwood City, San Jose, Sunnyvale, and Santa Monica as well as attainable trip reductions in the VTA's VMT Tool. The draft ADT reduction thresholds are scaled for different project scales and consider proximity to transit recognizing economies of scale in implementing TDM strategies for projects.

The targets also reflect feedback received from key stakeholders such as BPAC members who requested that the thresholds be designed to ensure the Ordinance does not disincentivize desirable Transit-Oriented Development (TOD) projects. The definition of TOD is a "project located within 0.5 mile of 'high quality transit.'" The proposed ADT reduction targets for TOD reflect information gained from neighboring jurisdictions on the decrease in trip generation levels for TOD. For example, San Mateo City and County Associations of Governments (C/CAG) provides 10% bonus for TODs given that they are near "high-quality" transit service and typically generate fewer single-occupancy vehicle trips.³ In addition, VTA's Transportation Impact Analysis Guidelines⁴ state that typically, TOD projects that are located within one-half mile of high-quality transit generate approximately 10% less vehicular trips. The ADT targets are aligned with regional planning standards and policies, including MTC's Transit-Oriented Communities (TOC) policy.⁵ Furthermore, the ADT thresholds will inform the number and types of TDM strategies an applicant will select as part of developing their TDM Plan.

6. ***How would the requirements be applied?***

Prior to entitlement, applicants will be required to submit a TDM Plan for City review and approval before Council approval of entitlements. Items from the TDM Plan will then be included in the checklist for receiving temporary and permanent certificates of occupancy. A checklist format of the TDM Plan will provide applicants with the flexibility and consistency to reasonably comply with the requirements under the Ordinance. This format

³ TDM Policy Update Approach, San Mateo C/CAG sets a lower trip reduction threshold for TODs due to proximity to high-quality transit and lower trip generation: <https://ccagtdm.org/wp-content/uploads/2021/12/FINAL-CCAG-TDM-Policy-Update-Document-9-9-2021.pdf>

⁴ VTA's TIA Guidelines provide trip reduction values to account for the effect of proximity to transit, noting 6% to 9% less trip generation volumes for development located near high-quality transit service: https://www.vta.org/sites/default/files/documents/VTA_TIA_Guidelines_2014_MainDocumentOnly_FINAL.pdf

⁵ MTC TOC Policy seeks to increase density for residential, businesses, and commercial development near transit-rich areas, enabling people to access and use transit more often for more types of trips: <https://mtc.ca.gov/planning/land-use/transit-oriented-communities-toc-policy>.

addresses key feedback received from stakeholders regarding the need for simplicity, predictability, and guidance on how to develop TDM Plans, specifically including a standardized list of Citywide TDM strategies for achieving required trip reduction targets.

TDM Plans will be comprised of three types of strategies:

- “Required” strategies that provide the supportive structure to implement TDM. These include the provision of on-site contact information and fulfilling postoccupancy reporting requirements.
- “Core” strategies that provide an array of flexible, proven trip-reduction strategies that applicants may select from to develop the project’s TDM Plan. Each strategy is associated with an estimated ADT reduction level that can be used in combination with others to achieve the overall trip reduction target.
- “Auxiliary” strategies that may not have significant trip reduction potential as stand-alone strategies but are essential in supporting the successful implementation of Core strategies.

Specific required strategies are outlined in Table 2. Applicants should use the TDM Toolkit to guide them in the creation of their TDM Plan (Attachment 1). The toolkit provides information on the expected levels of effectiveness for each TDM strategy. If applicants wish to implement more robust and tailored strategies than the standard options provided in the toolkit (such as shuttle services that are designed based on employee addresses), they may propose alternative calculations of trip reduction effectiveness. In such cases, applicants will be responsible for providing sufficient evidence to validate their claims of effectiveness, such as the Santa Clara Valley Transportation Authority (VTA) TDM Tool, surveys of trip reduction at other sites, peer-reviewed trip generation analyses, and California Office of Planning and Research policy advisories.

Table 1: TDM Plan Requirements by Project Size

TDM Plan Elements		Small Projects	Medium Projects	Large Projects
Required Strategies	Transportation Coordinator	✓	✓	✓
	TMA membership		✓	✓
	Annual TDM reporting	✓	✓	✓
	Annual travel survey	✓	✓	✓
	Traffic counts	✓	✓	✓
	Property transfer form	✓	✓	✓
Core Strategies*		<i>Select an adequate number of strategies to reach the specified ADT reduction target.</i>		
Auxiliary Strategies*		<i>Select 2 strategies</i>	<i>Select 3 strategies</i>	<i>Select 5 strategies</i>

* For more information on TDM Strategies, see Attachment 1.

7. **How will TDM implementation be monitored?**

Once a project has been built and occupied, its TDM implementation progress will be monitored and reported to the City on an annual basis. The monitoring and reporting requirements will be included as part of Conditions of Approval for new developments.

Ongoing TDM reporting requirements are based on the observed differences in transportation impacts between small and large projects and recognize the City's commitment to encouraging small businesses and recognition that smaller projects have fewer resources to comply with ongoing monitoring requirements. TDM reports will constitute both qualitative and quantitative elements. The qualitative element relates to the program participant's update on the status of the TDM Plan to allow City staff to verify consistency with the project's Conditions of Approval. The quantitative elements of the TDM reports consist of a travel survey of regular site users (both employees and/or residents) as well as traffic counts (such as at a driveway) to verify compliance with the ADT reduction target.

As shown in Table 3, the size of the project will determine the reporting requirements. If projects fail to comply with requirements, their reporting time periods will be extended until compliance is achieved.

Table 3: Ongoing TDM Reporting Requirements by Project Size

	Small Projects (200-499 ADT)	Medium Projects (500-999 ADT)	Large Projects (1,000+ ADT)
TDM reporting to the City	Annually, for first three years after occupancy	Annually, for first 10 years after occupancy	Annually, for first 15 years after occupancy
Travel survey of regular site users*	Annually, for three years	Annually, for 10 years	Annually, for 15 years
Daily traffic counts	Annually, for three years	Annually, for 10 years	Annually, for 15 years

* Regular site users include both employees and/or residents.

Projects will be expected to demonstrate compliance with their respective ADT reduction targets postoccupancy using traffic counts. After occupancy, ADT is calculated as follows (for weekdays):

$$ADT = \frac{\text{Total trips to and from a site during a time period}}{\text{Number of days in that time period}}$$

In the entitlement phase, projects will use the TDM Toolkit and select the requisite number of strategies to achieve the required ADT-reduction threshold. Upon the first year of occupancy, projects will demonstrate compliance by providing the annual TDM report as part of ongoing monitoring requirements

Committee Recommendation

The draft TDM Ordinance framework was reviewed by BPAC on [January 29, 2025](#), EPC on [February 5, 2025](#), and CTC on [March 4, 2025](#). Comments from each committee are provided below:

BPAC supported the above framework and passed the following motion in a 4-to-1 vote: “The BPAC supports the staff recommended framework and would like to see staff continue to develop the framework to avoid unintended incentives against projects that may lower vehicle miles traveled (VMT).” In addition to this motion, BPAC members also provided the following comments:

- Appreciation that the draft framework built upon existing rules and metrics;
- Request that staff continue to refine the framework, including baseline trip calculations and core strategies, to avoid disincentivizing desirable developments such as those in proximity to transit with fewer parking spaces;

- Request that the Ordinance support and incorporate VTA efforts currently under way to establish an Equitable VMT Mitigation Program for Santa Clara County;
- Requested that the TDM Toolkit incorporate more robust trip reduction strategies related to priced parking and limited parking;
- Interest in information on cost implications of implementing TDM strategies and concern that a TDM Ordinance may overly burden new development;
- Request for further refinement of the TDM toolkit to clarify what TDM strategies, such as bike facilities and ride-share programs, entail;
- Request that the Ordinance provide flexibility in developing TDM Plans so that credit may be given to applicants that exceed the minimum trip reductions stipulated in the TDM toolkit for a specific strategy;
- Interest in ensuring the validity of reporting data; and
- Request that the penalty structure be scaled appropriately to ensure compliance and proportionality.

EPC members generally supported the recommended ordinance framework and provided the following input on the draft TDM Framework.

- Maintain the TDM Ordinance’s goal to promote effective use of roadway capacity while reducing traffic and congestion, as achieved through the use of ADT as a performance metric (4-to-1 vote);
- Consider a mechanism to synergistically collect and review peak-hour traffic data in order to inform the Ordinance development (unanimous);
- Examine or provide allowance for alternative count methodologies to verify site-level trip reductions beyond driveway counts and that also mitigate spillover parking effects (unanimous); and
- Review alternative methodologies to update the existing penalty structure to one that provides a clear penalty that is scaled according to project impact or trips and is applicable to all projects, including even small projects, in addition to medium and large projects (unanimous).

The Council Transportation Committee (CTC) reviewed the framework and recommended the TDM Ordinance to the City Council as presented in this report. CTC members also provided the following feedback:

- Consider the staffing levels necessary to ensure the TDM program can be credibly implemented;
- Include safeguards in the TDM Framework to support enforcement mechanisms; and
- Supported the issue raised by BPAC to ensure the TDM Ordinance considers the cost implications associated with implementing proposed TDM strategies.

QUESTION FOR COUNCIL

Staff is requesting Council input on the following question:

Does the City Council concur with the staff recommendations or have other feedback on the Ordinance framework?

NEXT STEPS

Staff will consider input from Council on the elements of the TDM framework and incorporate any needed changes. Staff anticipates returning to EPC and Council for review of the draft Ordinance language, including recommendations for enforcement, in Q4 2025/Q1 2026 for final adoption in Q2 2026.

PUBLIC NOTICING—Newspaper posting.

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