



SAN FRANCISCO PLANNING DEPARTMENT

Executive Summary Adoption of Amendments to the TDM Program Standards HEARING DATE: JUNE 7, 2018

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Case Number: 2017-002943CRV
Project Name: Amendments to the TDM Program Standards
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Recommendation: **Recommend Approval**

The action before the Planning Commission is a resolution adopting substantive amendments to the TDM Program Standards, based on stakeholder outreach and feedback on the Program's first year of implementation. While this document provides brief background information, Attachment B includes the amended language to both the substantive and minor amendments to the TDM Program Standards.

BACKGROUND

The Planning Commission adopted two resolutions on August 4, 2016: 1) a resolution recommending that the Board of Supervisors adopt an ordinance amending the Planning Code to establish a citywide Transportation Demand Management (TDM) Program (TDM Ordinance); and 2) a resolution adopting the Planning Commission Standards for the TDM Program (TDM Program Standards), that contain the specific requirements necessary for implementing the TDM Program, conditioned upon approval of the TDM Program Planning Code amendments by the Board of Supervisors. On February 7, 2017, the San Francisco Board of Supervisors approved the ordinance amending the Planning Code to establish a Transportation Demand Management (TDM) Program (Board of Supervisors File #160925); and the Mayor signed it on February 17, 2017 making it effective as of March 18, 2017.

Planning Code Section 169.6 requires the Planning Department to prepare a TDM Program report one year after the Program became effective, to analyze the implementation of the Program and discuss any amendments made to the Program Standards during that time. It also requires the Planning Department to prepare a similar report every four years, following the periodic updates to the San Francisco Countywide Transportation Plan prepared by the San Francisco County Transportation Authority. The first-year report is included as Attachment A.

PAST AMENDMENTS TO THE TDM PROGRAM STANDARDS - APPROVED

Subsequent to the August 4, 2016 adoption of the TDM Program Standards by the Planning Commission, Program staff returned to the Planning Commission on January 19, 2017 with the first set of proposed amendments to the TDM Program Standards. The Planning Commission approved the amendments, summarized below.

1. Lowering the Minimum Target

Under the original Standards, the minimum required target for development projects in land use category C (Residential) with between 0 and 15 parking spaces was set at 13 points. The amendment made it so projects with fewer than 16 parking spaces required a target as low as 10 points.

2. Remove Requirement to Reduce Parking for Projects with Substantial Amount of Parking

Under the original Standards, development projects with very large amounts of parking would have to select all measures on the TDM menu and reduce their parking to meet the neighborhood parking rate in order to be in compliance with the Program. To retain flexibility for project sponsors and decision-makers in these circumstances, the amendments were made to remove the requirement to reduce parking for projects with substantial amounts of parking and replaced it with number 3, below.

3. Create a Maximum Required Target for Projects

The amendment made it so that no project's required target would exceed 80% of the points that a project could otherwise achieve from the TDM menu of options. This resulted in a target point cap of approximately 29 to 33 points for all projects.

4. Car-share Parking and Membership

Under the original Standards, a project sponsor could only meet car-share measures through the use of a Certified Car-share Organization. The amendment made it so that there was an option for projects to provide their own car-share vehicles and program for any car-share spaces offered in excess of those required by the Planning Code, as long as such private service employed the same operating parameters as a Certified Car-Share Organization.

5. Family TDM Amendments

The amendment clarified the requirements for on-site amenities, including specifications for the intensity and space required for the amenities.

6. On-site Childcare

The amendment made it so that a Designated Child Care Unit, as defined in Planning Code Section 401, is allowed to fulfill the requirements of this TDM measure.

7. Contributions or Incentives for Sustainable Transportation

The amendments made it so that a fare product, such as an institutional pass, that provides monthly full-access to Muni to be considered equivalent to providing the monthly Muni only "M" pass of provided at a rate of one pass per Dwelling Unit or employee. The amendment also specifies that any contribution or incentive to a non-public transit or public transportation provider shall be subject to, not just recommended, approval from the SFMTA.

In addition to these amendments approved by the Planning Commission, Program staff also updated the TDM Technical Justification document to reflect the amendments. The TDM Technical Justification document provides the technical basis for the creation of the applicability, targets, and assignment of points to individual measures on the TDM menu. The updated version was published on January 10, 2018.

PROPOSED AMENDMENTS TO THE TDM PROGRAM STANDARDS

Planning Code Section 169.6 requires the Planning Department to prepare a TDM Program report one year after the Program became effective, to analyze the implementation of the Program and discuss any amendments made to the Program Standards during that time. Since the Program's effective date of March 19, 2017, staff has conducted stakeholder in-reach and outreach to monitor the Program's implementation and to identify potential amendments to the TDM Program Standards to help clarify and/or change the Program's implementation. These amendments to the TDM Program Standards are

proposed for adoption by the Planning Commission and are summarized below, and detailed in Exhibit A of the draft resolution. The draft resolution is Attachment B.

The following amendments are organized by “substantive” and “minor” per Section 4.1 of the TDM Program Standards. **Substantive amendments require Planning Commission adoption**, while minor amendments (e.g., clarifying text edits) may be made administratively by the Planning Department.

SUBSTANTIVE AMENDMENTS

1. Improve Walking Conditions

Amendment. The amendments proposed to this TDM measure would expand the number of options from two to four. This would add flexibility to the measure overall.

Discussion: Members of the walking community (WalkSF) expressed concerns about the potential disincentive for a developer to choose this measure in its current form, to provide 10 walkability streetscape improvements to achieve one point. This amendment would address the concern, while providing additional flexibility in fulfilling the TDM measure.

2. Bicycle Parking

Amendment. The amendments proposed to this TDM measure would make implementation for options B through D for the land use category C (Residential) more proportional to each other much like they are for the retail and office land use categories.

Discussion. Developers of very large projects provided feedback that the differences between the requirements of the measure’s options were unfairly allocated for land use category C (Residential) compared to the requirements for the other land uses. Under current requirements the difference between options A – Planning Code compliant bicycle parking – and option B more than doubled in the amount of Class 1 bicycle parking spaces required for projects with over 100 dwelling units.

MINOR AMENDMENTS

1. Text changes

Amendment: The amendments proposed are minor text changes within the TDM Program Standards that either clarify or correct the existing language. For details, see Exhibit A of the draft resolution.

2. Projects with Multiple Buildings

Amendment. The addition of a section in the TDM Program Standards serves to clarify the requirements for implementation and allocation of a project’s TDM measures proportionally amongst all of the buildings in a project.

Discussion: This amendment clarifies the intention of providing accessibility to a project site’s TDM measures for all residents, employees, and/or visitors.

3. Family TDM Amenities

Amendment. The amendment corrects the reference to Planning Code Section 207.6(c)(e) regarding minimum dwelling unit mixes.

Discussion: This amendment is a simple Code reference correction.

4. Contributions or Incentives for Sustainable Transportation

Amendment. The amendment to the TDM measure clarifies a project sponsor's requirement to offer contributions or incentives, at least once annually, and that these offers shall be made on a monthly basis. It also clarifies that any contribution or incentives from a non-public provider shall be subject to approval from the SFMTA Director or designee.

Discussion:

The previous language was drafted in a manner that could be interpreted such that accepted offers for transit subsidies could be fulfilled on an annual basis. This amendment clarifies the need to fulfill such accepted subsidies on a monthly basis.

5. Shuttle Bus Service

Amendment: San Francisco Municipal Transportation Agency (SFMTA) contact information for shuttle bus services is added for additional resources for the potential implementation of this TDM measure.

Discussion. Project sponsors need approval from SFMTA to be eligible to achieve points for this TDM measure. Through the TDM measure fact, project sponsors will have a direct contact to ask for assistance and get their shuttle service plan reviewed by SFMTA.

6. On-Site Affordable Housing

Amendment: This amendment clarifies that income at or below 55% of the area median income equates to the label "very low income."

Discussion. This amendment aligns the description of the AMI level with the term already used in the Planning Code.

REQUIRED COMMISSION ACTION

The proposed Resolution is before the Commission so that it may adopt the proposed substantive amendments to the TDM Program Standards.

RECOMMENDATION

The Department recommends that the Commission adopt the proposed substantive amendments to the TDM Program Standards.

BASIS FOR RECOMMENDATION

The TDM Program Standards are intended to be updated over time. The amendments within are the result of further outreach and feedback with a variety of stakeholders to implement an effective, flexible, and feasible TDM Program.

ENVIRONMENTAL REVIEW

The action described herein is subject to review under the California Environmental Quality Act. The requisite environmental review has been completed, a Categorical Exemption has been issued, and the Certificate of Categorical Exemption was included as Attachment H Certificate of Categorical Exemption in the August 4th, 2016 Executive Summary.

RECOMMENDATION:	Adopt the Resolution
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Attachments:

Attachment A: TDM Program First-Year Report

Attachment B: Draft Resolution Approving the Proposed Amendments to the TDM Program Standards
(including Exhibit A)

ATTACHMENT A: TDM PROGRAM FIRST-YEAR MONITORING REPORT



SAN FRANCISCO PLANNING DEPARTMENT

TDM Program First-Year Monitoring Report

Published May 31, 2018

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ABOUT THE TDM PROGRAM

The TDM Program is the third and final component of the Transportation Sustainability Program (TSP). In 2015, the City adopted the Transportation Sustainability Fee, which collects money from new development to invest in transit and safer streets. In 2016, the City, in accordance with SB 743, abandoned Level of Service as a way of measuring transportation impacts of new development and began using Vehicle Miles Travelled (VMT) as a measurement, taking into consideration how much driving a project generates. In 2017, the City adopted the TDM Program with the specific goal of reducing VMT from new development. The TDM Program influences transportation choices for residents, employees, and visitors of new development to reduce the need to drive and encouraging additional transportation options.

The TDM field is broad and includes varying perspectives and strategies. This TDM Program is specifically a development-focused program that helps manage demand on the transportation network by building in transportation options in the form of TDM measures – physical measures, incentives, information, and resources – that support more sustainable trips and travel behavior. The more off-street vehicular parking a project proposes, the more TDM measures are required to be implemented on a project site. The Program is designed to make it easier for new residents, employees, and visitors to get around by sustainable travel modes such as transit, car-share, walking, and biking. Each measure included in the TDM Program is intended to reduce VMT and is provided by the property owner.

The TDM Program has two key structural elements – 1) Planning Code Section 169, which codifies the legal framework, applicability, exemptions, and timing requirements for the Program, and 2) the Standards for the TDM Program (aka TDM Program Standards), which provide the more detailed implementation requirements and the specific TDM measures available for projects to employ. The TDM Program Standards were adopted by the Planning Commission on August 4, 2016 and Planning Code Section 169 was made effective by the Board of Supervisors on March 19, 2017. More details can be found on the [TDM Program](http://www.sfplanning.org/tdm-program) website.

ABOUT THIS REPORT

Planning Code Section 169.6 requires the Planning Department to prepare a TDM Program report one year after the Program became effective, to analyze the implementation of the Program and discuss any amendments made to the Program Standards during that time. This report roughly aligns with the “phase-in” adopted as part of the Program, which gradually increased the TDM Program requirements until full compliance was required for all projects that filed their First Development Application on or after January 1, 2018. The goal was to provide approximately one year to allow the public, development community, and the Department time to better incorporate and prepare for full implementation of the new Program. This “phase-in” is discussed further below. This 2017 Transportation Demand Management (TDM) Program Monitoring Report is the Planning Department’s first-year report, referencing information gathered between March 19, 2017 and March 18, 2018.

TDM PLAN PHASE-IN REQUIREMENTS

While the TDM Program was going through its adoption process, a “phase-in” of requirements was included to make sure that the development community had a period of time to adapt to such a new program. The TDM Program phase-in requirements are depicted in Table 1. It’s important to note that some TDM measures are already Planning Code requirements for projects. As such, many projects subject to only 50% of their TDM target achieved their target primarily, if not entirely, through their Code-required measures. This fact, along with the multi-year process of development review and project construction, means that it will still be several years before projects with more robust TDM plans are actually built and occupied.

Table 1. TDM Program Development Phase-In Requirements

Action & Timing	% Target Required	Number of TDM Plans
Projects with a completed EE filed on or before September 4, 2016	50%	66
Projects with a Development Application filed between September 5, 2016, and December 31, 2017	75%	19
Projects with a Development Application filed after December 31, 2017*	100%	1
Total Number of TDM Plans Under Review		86

*As of March 18, 2018

TDM PLANS

Planning Code 169.3 defines the TDM Program’s applicability for developments that require TDM Plans. TDM Plans fall into four sequential categories: needed, filed, finalized, or occupied. TDM Plans that are **needed** are those related to projects in the development pipeline that are subject to the TDM Program but have not yet filed their TDM Plan Application. Plans that are **filed** are currently under review with their associated project. A TDM Plan is considered **finalized** when it is recorded with the City and County of San Francisco’s Office of Assessor-Recorder through a Notice of Special Restriction (NSR). A project is required to have their TDM Plan finalized in order to get their building permits issued and to eventually start construction. Before a project can receive its First Certificate of Occupancy it must complete the TDM Pre-Occupancy Monitoring requirements, which include a site inspection of TDM measures. This step ensures that all measures in the project’s TDM Plan will be implemented upon occupancy. Once this step is completed, and the First Certificate of Occupancy is issued, the TDM Plan is considered **occupied**.

Pre-Program TDM Projects

Some projects obtained Planning Commission approvals during the period after the TDM Program Standards were adopted by the Planning Commission on August 4, 2016, but before Planning Code Section 169 was made effective by the Board of Supervisors on March 19, 2017. The Planning Department wanted to ensure that such projects still met the requirements of the TDM Program in some way. Because these projects were not technically subject to the TDM Program, the Planning Commission adopted specific conditions of approval requiring certain levels of compliance with the adopted TDM Program Standards. Although these projects do not have formal TDM Plans, they are still subject to the monitoring and reporting requirements of the Program, and therefore are worth noting in the larger TDM Program context.

The Current Universe of TDM Plans

Eighty-six development projects, either already in the development pipeline, or more recently filed, became subject to the TDM Program and filed TDM Plan Applications in the first year. The majority of these projects are all still under review and none have completed their Pre-Occupancy Monitoring and Reporting phase of the Program. Three TDM Plans are finalized and recorded. By the end of this reporting period no TDM Plans had started construction nor had any been deemed occupied. By the end of the quarter four of 2018, there were 76 projects in the development pipeline subject to the TDM Program that have yet to and need to file their TDM Plan Applications.

To see a full list of projects with TDM Plan Applications filed, see **Appendix A**.

Table 2. TDM Plans Under Review, March 19, 2017 through March 18, 2018

Description	Numbers
Pre-Program TDM Plans Approved	12
Number of TDM Plans Applications Filed	86
Number of TDM Plans Finalized - NSR Recorded	3
Rate of Compliance – Monitoring & Reporting *	N/A

* No projects subject to the TDM Program have entered the Monitoring and Reporting phase

PROGRAM DEVELOPMENT

TDM Program Feedback

Over the course of the first year of the Program, staff gathered feedback on the TDM Program, applications and forms, and implementation processes from City staff and project sponsors. Two key questions were asked: 1) did any projects have difficulty meeting their point target, and 2) was the process clear and understandable for project sponsors and staff. Feedback indicated that the Program's expectations are achievable, and there was no specific feedback about difficulty to meet Program requirements. It is important to note again that at this time the majority of the TDM Plan Applications filed were only subject to meeting 50% of their required target points. Feedback also indicated that the Program was understandable and implementation was fairly smooth. The inclusion of language about the TDM Program and its applicability within Preliminary Project Assessments (PPAs) helped inform project sponsors early in the process. Additionally, the online TDM Tool was a valuable and well-liked resource for project sponsors and staff.

During the initial outreach for the Program, stakeholders specially identified concerns about the potential difficulty for smaller residential projects to implement the program. While the TDM Program was originally amended to address these concerns, Program staff also reviewed the implementation of the Program for these smaller residential projects (10-24 dwelling units) during this first year. Of the 17 small residential projects with TDM Plans filed during the first year, none provided any specific concerns or issues related to achieving a TDM Plan with the appropriate point targets.

New Trends and Research

During the TDM Program creation and adoption period, the issue regarding if and how Transportation Network Companies (TNCs) should be included in the Program was raised. The Planning Department repeatedly stated that there was no data or research to indicate that TNCs reduce VMT from individual development projects, but that any such data or research that became available in the future would be considered. As such, no provisions for TNCs were included in the Program.

In June 2017, the San Francisco County Transportation Authority released a study on TNCs titled “TNCs Today: A Profile of San Francisco Transportation Network Company Activity.” With the intention of helping the public and policy-makers understand the extent of their activities and assess the need to manage them, this study describes the first comprehensive estimate of the volume, frequency, and coverage of ride-hailing trips by Uber and Lyft in San Francisco. One major finding was that TNC trips account for approximately 750,000 vehicle miles travelled (VMT) within the city, representing 20% of all local daily VMT, including both in-service and out-of-service mileage.

In December 2017, the San Francisco County Transportation Authority released a draft report on TNCs titled “The TNC Regulatory Landscape.” The draft provides an overview of existing state and local TNC regulatory frameworks across the country and within California. With the rapid expansion of ride-hail companies over the last several years, new policy and legislative measures are being driven by concerns around safety, liability, and fares. The California Public Utilities Commission oversees statewide policies for TNCs, and is currently engaged in Phase III of a rulemaking process to refine regulations for these companies. However, at this time there are no TNC-specific policies to mitigate vehicle congestion.

TDM Program Amendments

TDM is an evolving field and new technological advances occur regularly. Amendments to the TDM Program Standards may be made by the Planning Department or the Planning Commission, including potential amendments to the TDM menu. Amendments to the TDM Program and menu of TDM measures shall be grounded in literature review, local data collection, best practice research, and/or professional transportation expert opinion. A citywide TDM working group comprised of City interagency staff from the Planning Department, the San Francisco Municipal Transportation Agency, and the San Francisco County Transportation Authority is tasked with conducting, collecting, and analyzing data in support of the TDM Program.

Program amendments can include the addition or removal of TDM measures, or the adjustment of definitions, points, or monitoring and reporting actions associated with TDM measures. Such amendments must be made in consultation with San Francisco Municipal Transportation Agency and San Francisco County Transportation Authority. Substantive amendments require Planning Commission adoption, while minor amendments (e.g., clarifying text edits) may be made administratively. The Program amendments will be formally presented to the Planning Commission separately from this report. However, the amendments are described below.

Past Substantial Amendments – Approved

Subsequent to the August 4, 2016 adoption of the TDM Program Standards by the Planning Commission, Program staff returned to the Planning Commission on January 19, 2017 with the first set of proposed amendments to the TDM Program Standards reflecting stakeholder considerations and further refined analyses. The Planning Commission approved the substantial amendments, summarized below.

1. *Lowering the Minimum Target*

Under the original Standards, the minimum required target for development projects in land use category C (Residential) with between 0 and 15 parking spaces was set at 13 points. The amendment made it so projects with fewer than 16 parking spaces required a target as low as 10 points.

2. *Remove Requirement to Reduce Parking for Projects with Substantial Amount of Parking*

Under the original Standards, development projects with very large amounts of parking would have to select all measures on the TDM menu and reduce their parking to meet the neighborhood parking

rate in order to be in compliance with the Program. To retain flexibility for project sponsors and decision-makers in these circumstances, the amendments were made to remove the requirement to reduce parking for projects with substantial amounts of parking and replaced it with number 3, below.

3. *Create a Maximum Required Target for Projects*

The amendment made it so that no project's required target would exceed 80% of the points that a project could otherwise achieve from the TDM menu of options. This resulted in a target point cap of approximately 29 to 33 points for all projects.

4. *Car-share Parking and Membership*

Under the original Standards, a project sponsor could only meet car-share measures through the use of a Certified Car-share Organization. The amendment made it so that there was an option for projects to provide their own car-share vehicles and program for any car-share spaces offered in excess of those required by the Planning Code, as long as such private service employed the same operating parameters as a Certified Car-Share Organization.

5. *Family TDM Amendments*

The amendment clarified the requirements for on-site amenities, including specifications for the intensity and space required for the amenities.

6. *On-site Childcare*

The amendment made it so that a Designated Child Care Unit, as defined in Planning Code Section 401, is allowed to fulfill the requirements of this TDM measure.

7. *Contributions or Incentives for Sustainable Transportation*

The amendments made it so that a fare product, such as an institutional pass, that provides monthly full-access to Muni is considered equivalent to providing the monthly Muni only "M" pass provided at a rate of one pass per Dwelling Unit or employee. The amendment also specified that the contribution of incentive is for public transit or public transportation provided, unless approved by the SFMTA.

In addition to these amendments approved by the Planning Commission, Program staff also updated the TDM Technical Justification document to reflect the amendments. The TDM Technical Justification document provides the technical basis for the creation of the applicability, targets, and assignment of points to individual measures on the TDM menu. The updated version was published on the [TDM Program](#) website on January 10, 2018.

Proposed Substantial Amendments – Recommended for Approval

For this reporting period, two substantial amendments to TDM Measures are being proposed. Program staff worked on an amendment to variate ACTIVE-1 Improve Walking Conditions into different levels of implementation and worked on an amendment to ACTIVE-2 Bicycle Parking to make the implementation for the Residential land use category more proportional amongst the different options. These proposed amendments are generally described below.

1. *ACTIVE-1 Improve Walking Conditions*

Members of the walking community (WalkSF) expressed concerns about the potential disincentive for a developer to choose this measure in its current form. In its current form, this measure provides

only two options (A and B). The proposed amendment expands the options from two to four (A through D), and adds additional flexibility to the measure overall.

2. *ACTIVE-2 Bicycle Parking*

Developers of very large projects provided feedback that the differences between the requirements of the measure's options were unfairly allocated for land use category C (Residential) compared to the requirements for the other land uses. Under current requirements the difference between options A – Planning Code compliant bicycle parking – and option B more than doubled the amount of Class I bicycle parking spaces required for projects with over 100 dwelling units.

The amendments proposed to this TDM measure will make implementation for options B through D for the land use category C (Residential) proportional to each other much like they are for the retail and office land use categories. Now projects with 100 or less dwelling units can only be eligible for Option A. Flexibility in meeting their point targets for these projects is still maintained as projects of this size wouldn't typically generate enough points to be burdensome.

ABOUT FUTURE REPORTING

The Planning Code requires the Planning Department to prepare a similar report every four years, following the periodic updates to the San Francisco Countywide Transportation Plan prepared by the San Francisco County Transportation Authority. Those future reports will be provided every four years and will address:

- The number and size (units, square footage, parking spaces, etc.) of projects subject to the TDM Program, including the number of projects added since the last report and a breakdown of measures that have been selected; status of projects (under development review; entitled; under construction; occupied); and monitoring reports noting the number of projects reviews, rates of compliance, and any concerns associated with occupied projects;
- Amendments to the TDM Program Standards that occurred since the last report (or that are proposed concurrently with the report);
- Trends in the TDM field, including a summary of empirical research conducted by City staff since the last report;
- Recommended amendments to the TDM Program, other than the TDM menu described above, based upon experience implementing the TDM Program and best practice research; and
- Other relevant findings associated with the TDM Program.

By monitoring the Program on an ongoing basis, the Transportation Demand Management (TDM) Program Monitoring Report provides a basis for not only evaluating the implementation of the program, but also for improving the Program to respond to the needs of the City, as well as research and new technologies to come.

PROGRAM HIGHLIGHTS

Following the effective date of the San Francisco Transportation Demand Management (TDM) Program, March 19, 2017, this first year of implementation focused on the following:

- Hiring dedicated staff to manage the Program's implementation and performance;
- Creating necessary forms, applications, and templates;

- Designing tools to help navigate the creation of a TDM Plan;
- Refining the online TDM Tool;
- Updating the TDM Technical Justification document to include amendments from the January and February 2017 Planning Commission and Board of Supervisor hearings, respectively.
- Updating the TDM Program website;
- Training staff on the Program;
- Engaging development projects subject to the TDM Program;
- Designing the Monitoring and Reporting procedures of the Program; and
- Exploring updates to the Program and developing proposed amendments to update and clarify the Program.

Last year the TDM Program also garnered attention and appreciation from other jurisdictions and organizations, most notably receiving awards from the American Planning Association (APA) and the Association for Commuter Transportation (ACT).

REFERENCE

Copies of this report can be downloaded from the Transportation Demand Management Program website at <http://sf-planning.org/transportation-demand-management-program>. .

Department staff contact for this report is Audrey Harris, the TDM Performance Manager, to be reached at (415) 575-9136 or audrey.harris@sfgov.org.

APPENDIX A: TDM PLANS UNDER REVIEW, MARCH 19, 2017 THROUGH MARCH 18, 2018

Address	Case No.	Date TDM Plan Application Filed	Application Record Status
2255 Taraval Street	2013.0499TDM	3/29/2017	Finalized - NSR Recorded
1433 Bush Street	2015-009279TDM	4/7/2017	Under Review
495 Cambridge Street	2013.1711TDM	4/7/2017	Under Review
719 Larkin Street	2015-005329TDM	4/21/2017	Under Review
1420 Hampshire Street	2016-007695TDM	4/25/2017	Under Review
2750 19th Street	2014.0999TDM	4/25/2017	Under Review
999 Folsom St / 301 6th Street	2013.0538TDM	5/1/2017	Under Review
1298 Howard Street	2014.0011TDM	5/4/2017	Under Review
1144-1150 Harrison Street	2016-001738TDM	5/17/2017	Under Review
2675 Geary Boulevard	2015-007917TDM	5/17/2017	Under Review
349 8th Street	2015-004085TDM	5/17/2017	Finalized - NSR Recorded
888 Tennessee Street	2013.0975TDM	5/22/2017	Under Review
2140-2144 Market Street	2014-002035TDM	5/23/2017	Under Review
2670 Geary Boulevard	2014-002181TDM	5/24/2017	Under Review
10 South Van Ness Avenue	2015-004568TDM	5/25/2017	Under Review
135 Hyde Street	2015-015203TDM	5/25/2017	Under Review
230 7th Street	2014.0244TDM	5/25/2017	Under Review
2301 Lombard Street	2015-014040TDM	5/25/2017	Under Review
768 Harrison Street	2013.1872TDM	5/26/2017	Under Review
606 Capp Street	2015-010361TDM	5/30/2017	Under Review
77 / 85 Federal Street	2012.1410TDM	5/30/2017	Finalized - NSR Recorded
2390 Bush Street & 2445 Pine Street	2013.0152TDM	6/1/2017	Under Review
824 Hyde Street	2016-010544TDM	6/12/2017	Under Review
342-360 5th Street	2015-005863TDM	6/14/2017	Under Review
30 Otis Street	2015-010013TDM	6/19/2017	Under Review
3601 Lawton Street	2015-009053TDM	6/20/2017	Under Review
980 Folsom Street	2013.0977TDM	7/12/2017	Under Review
2444 Lombard Street	2014.1183TDM	7/14/2017	Under Review
1726-1730 Mission Street	2014-002026TDM	7/18/2017	Under Review
828 Brannan Street	2015-015789TDM	7/19/2017	Under Review
2918 Mission Street	2014.0376TDM	7/27/2017	Under Review
229 Ellis Street	2016-007593TDM	7/28/2017	Under Review
1088 Howard Street	2017-009796TDM	8/1/2017	Under Review
1601-1637 Market Street	2016-005955TDM	8/2/2017	Under Review
793-799 South Van Ness Ave	2015-001360TDM	8/7/2017	Under Review
345 4th Street	2017-001690TDM	8/8/2017	Under Review
975 Bryant Street	2015-005862TDM	8/8/2017	Under Review
2632 Mission Street	2016-004707TDM	8/10/2017	Under Review
399 5th Street	2016-010782TDM	8/10/2017	Under Review

TDM Program First-Year Monitoring Report

Address	Case No.	Date TDM Plan Application Filed	Application Record Status
344 14th Street & 1463 Stevenson Street	2014.0948TDM	8/11/2017	Under Review
3637-3657 Sacramento Street	2007.1347TDM	8/30/2017	Under Review
1500-1580 Mission Street	2014-000362TDM	9/11/2017	Under Review
280 7th Street	2016-004946TDM	9/12/2017	Under Review
184-188 Hooper Street	2016-001557TDM	9/19/2017	Under Review
744 Harrison Street	2016-004823TDM	9/19/2017	Under Review
2525 Van Ness Avenue	2016-002728TDM	9/26/2017	Under Review
478-484 Haight Street	2016-013012TDM	9/26/2017	Under Review
2465 Van Ness Avenue	2015-014058TDM	9/27/2017	Under Review
555 Golden Gate Avenue	2014.1102TDM	9/27/2017	Under Review
1540 Market Street	2009.0159TDM	10/6/2017	Under Review
600 20th Street	2016-008651TDM	10/24/2017	Under Review
2100 Mission Street	2009.0880TDM	10/25/2017	Under Review
1053-1055 Market Street	2014.0408TDM	10/26/2017	Under Review
816 Folsom Street	2017-012789TDM	11/8/2017	Under Review
610-698 Brannan Street	2017-000663TDM	11/14/2017	Under Review
255 Shipley Street	2016-012030TDM	11/28/2017	Under Review
3333 California Street	2015-014028TDM	11/30/2017	Under Review
531 Bryant Street	2016-004392TDM	11/30/2017	Under Review
650 Sacramento Street	2017-009472TDM	12/5/2017	Under Review
1300 Columbus Avenue	2017-005154TDM	12/8/2017	Under Review
3700 California Street	2017-003559TDM	12/13/2017	Under Review
598 Brannan Street	2012.0640TDM	12/19/2017	Under Review
655 4th Street	2014-000203TDM	12/19/2017	Under Review
519 Ellis Street	2014.0506TDM	12/27/2017	Under Review
2300 Harrison Street	2016-010589TDM	1/3/2018	Under Review
1801 & 1863 Mission Street	2009.1011TDM	1/4/2018	Under Review
350 2nd Street	2018-000497TDM	1/4/2018	Under Review
433 Mason Street	2016-014360TDM	1/5/2018	Under Review
1750 Van Ness Avenue	2016-015987TDM	1/9/2018	Under Review
262 7th Street	2014.0334TDM	1/11/2018	Under Review
429 Beale Street and 430 Main Street	2014-002033TDM	1/11/2018	Under Review
1075 & 1089 Folsom Street	2016-008438TDM	1/17/2018	Under Review
235 Valencia Street	2016-007877TDM	1/25/2018	Under Review
552 Berry Street & 1 De Haro Street	2015-015010TDM	1/25/2018	Under Review
2230 3rd Street	2013.0531TDM	1/26/2018	Under Review
636-648 4th Street	2015-003880TDM	1/29/2018	Under Review
150 Executive Park Blvd	2018-001154TDM	1/31/2018	Under Review
915 North Point Street	2017-000280TDM	2/1/2018	Under Review
603 Tennessee Street	2015-011202TDM	2/8/2018	Under Review

TDM Program First-Year Monitoring Report

Address	Case No.	Date TDM Plan Application Filed	Application Record Status
350 Masonic Avenue	2018-002179TDM	2/9/2018	Under Review
1721 15th Street	2016-008652TDM	2/27/2018	Under Review
600 Van Ness Avenue	2015-012729TDM	2/27/2018	Under Review
425 Mason Street	2016-005799TDM	2/28/2018	Under Review
420 Taylor Street	2017-016476TDM	3/8/2018	Under Review
2500 - 2698 Turk Street	2015-000058TDM	3/9/2018	Under Review
4550 Mission Street	2017-015691TDM	3/16/2018	Under Review

**ATTACHMENT B: DRAFT RESOLUTION RECOMMENDING APPROVAL OF THE PROPOSED
AMENDMENTS TO THE TDM PROGRAM STANDARDS (INCLUDING EXHIBIT A)**



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Resolution No. 20199

HEARING DATE: JUNE 7, 2018

Case No.: 2017-002943CRV
Project: Amendments to the TDM Program Standards
Staff Contact: Audrey Harris, (415) 575-9136
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ADOPTION OF SUBSTANTIVE AMENDMENTS TO THE PLANNING COMMISSION STANDARDS FOR THE TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM TO PROVIDE GREATER FLEXIBILITY TO THE PROGRAM AND UPDATE VARIOUS TDM MEASURES.

PREAMBLE

WHEREAS, the "Transit First Policy" in the City Charter declares that public transit is "an economically and environmentally sound alternative to transportation by individual automobiles," and that within the City, "travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile"; and

WHEREAS, the City has many plans, policies, and initiatives that seek to encourage safe travel by active modes of transportation including the San Francisco Bicycle Plan, the Green Connections Plan, the Better Streets Plan, Vision Zero, and others; and

WHEREAS, travel by transit, bicycle, or on foot are considered to be trips made by sustainable modes of transportation; and

WHEREAS, according to Plan Bay Area 2040, the Bay Area's Regional Transportation Plan and Sustainable Community Strategy, San Francisco is expected to grow by approximately 191,000 jobs and 102,000 households between 2010 and 2040; and

WHEREAS, this growth will generate an increased demand for transportation infrastructure and services on an already constrained transportation system; and

WHEREAS, one of the challenges posed by this growth is the increased number of single occupancy vehicle trips, and the pressure they add to San Francisco's limited public streets and rights-of-way, contributing to congestion, transit delays, and public health and safety concerns, and the air pollution, greenhouse gas (GHG) emissions, and noise caused by motorized vehicles, which negatively impact the quality of life in the City; and

WHEREAS, at the state level, the Congestion Management Law, Gov. Code Section 65088, has established that in order to reduce the state's traffic congestion crisis and "keep California moving," it is important to build transit-oriented development, revitalize the state's cities, and promote all forms of transportation; and

WHEREAS, various policies have been adopted at the state level that set GHG reduction targets, including Assembly Bill 32, the California Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006), Executive Orders B-30-15, S-3-05 and B-16-12, Senate Bill 375, and the Sustainable Communities and Climate Protection Act of 2008 (Chapter 728, Statutes of 2008); and

WHEREAS, local plans and policies including Plan Bay Area 2040, the GHG Reduction Ordinance, and the San Francisco Climate Action Strategy 2013 Update also set GHG reduction targets; and

WHEREAS, the transportation sector contributes significantly to GHG emissions and, as a result, many GHG emissions reduction targets are accompanied by targets to reduce vehicle miles traveled and to increase non-automobile mode share; and one of the ways identified to achieve these targets is through a requirement for the inclusion of transportation demand management (TDM) measures for new development; and

WHEREAS, the importance of TDM strategies are acknowledged in the Transportation Element of the General Plan and the San Francisco County Transportation Plan; and

WHEREAS, many Area Plans including each of the Area Plans within Eastern Neighborhoods and the Transit Center District Plan identify policies for the development of a TDM program for the Plan Area; and

WHEREAS, the TDM Program seeks to promote sustainable travel modes by requiring new development projects to incorporate design features, incentives, and tools that support transit, ride-sharing, walking, and bicycle riding for the residents, tenants, employees, and visitors of their projects; and

WHEREAS, the goals of the TDM Program are to help keep San Francisco moving as the city grows, and to promote better environmental, health, and safety outcomes, consistent with state, regional and local policies; and

WHEREAS, the Commission on August 4, 2016, adopted the TDM Program Standards; and

WHEREAS, the Board of Supervisors on March 18, 2018, made effective the TDM Program through Ordinance No. 160925 ; and

WHEREAS, since the effective date of the TDM Ordinance, one year after its implementation, staff have continued to conduct stakeholder outreach and gathered feedback; and

WHEREAS, in response to these comments and additional analysis staff is now proposing substantive and minor amendments (as defined in Section 4.1 of TDM Program Standards) to the TDM Program Standards, as shown in Exhibit A; and

WHEREAS, the amendments to the TDM Program Standards will provide more flexibility to developments, and make changes to individual TDM measures to provide additional specificity and clarity; and

WHEREAS, the Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the custodian of records, at 1650 Mission Street, Suite 400, San Francisco; and

MOVED, that the Planning Commission hereby adopts those substantive amendments to the TDM Program Standards detailed in Exhibit A, which establish the specific requirements necessary for compliance with the citywide TDM Program.

I hereby certify that the foregoing Resolution was **ADOPTED** by the San Francisco Planning Commission on June 7, 2018.



Jonas P. Ionin
Commission Secretary

AYES: Fong, Hillis, Johnson, Koppel, Melgar, Moore, Richards

NOES: None

ABSENT: None

ADOPTED: June 7, 2018

Exhibit A

To Resolution No. 20199

Substantive and minor amendments, as defined in Section 4.1 of the TDM Program Standards are included below. The page numbers for the TDM Program Standards correspond to the current TDM Program Standards. Revisions to the TDM fact sheets in Appendix A are located by the specific TDM Measure (e.g., ACTIVE-1).

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
Additions to Codes are in *single-underline italics Times New Roman font*.
Deletions to Codes are in ~~*strikethrough italics Times New Roman font*~~.
Asterisks (* * * *) indicate the omission of unchanged Standards subsections or parts of tables.

SUBSTANTIVE AMENDMENTS

1. ACTIVE-1 Improve Walking Conditions

Option A

For ~~large projects as defined by and~~ subject to Planning Code Section 138.1(c)(2), the property owner shall complete streetscape improvements consistent with the Better Streets Plan and any local streetscape plan so that the public right-of-way is safe, accessible, convenient and attractive to persons walking.

- The recommended sidewalk width adjacent to the property, ~~unless~~ If the recommended sidewalk width is determined to be infeasible or undesirable by City staff, then the minimum sidewalk width established in the Better Streets Plan must be provided in order to receive points for this TDM measure; AND
- ~~The All~~ required streetscape elements; AND ~~one of the following:~~
- ~~Ten Five~~ additional streetscape elements identified by City staff that contribute to VMT reduction/increased walking⁺²; OR

Option B

For projects subject to Planning Code Section 138.1(c)(2), the property owner shall complete streetscape improvements consistent with the Better Streets Plan and any local streetscape plan so that the public right-of-way is safe, accessible, convenient and attractive to persons walking.

- The recommended sidewalk width adjacent to the property. If the recommended sidewalk width is determined to be infeasible or undesirable by City staff, then the minimum sidewalk width established in the Better Streets Plan must be provided in order to receive points for this TDM measure; AND

- ~~The All required streetscape elements¹; AND one of the following:~~
- ~~Five of the additional streetscape elements identified by City staff, PLUS the The recommended sidewalk width beyond the project site (but not to exceed 50 feet beyond the project site in any direction), unless. If the recommended sidewalk beyond the project site is determined to be infeasible or undesirable by City staff, then the minimum sidewalk width established in the Better Streets Plan must be provided in order to receive points for this TDM measure; OR.~~

Option C

For projects subject to Planning Code Section 138.1(c)(2) that are also located on a High-Injury Corridor, the property owner shall complete streetscape improvements consistent with the Better Streets Plan and any local streetscape plan so that the public right-of-way is safe, accessible, convenient and attractive to persons walking.

- The recommended sidewalk width adjacent to the property. If the recommended sidewalk width is determined to be infeasible or undesirable by City staff, then the minimum sidewalk width established in the Better Streets Plan must be provided in order to receive points for this TDM measure; AND
- All required streetscape elements¹; AND one of the following:
- ~~Five of the additional streetscape elements identified by City staff PLUS the Development Project provides a minimum of two Safety Tools identified in the WalkFirst¹ 3 toolkit, if the Development Project is located on a High-Injury Corridor^{2,4}.~~

Option B-D

For projects not subject to ~~the large project requirements~~ Planning Code Section 138.1(c)(2), the property owner shall complete streetscape improvements consistent with the Better Streets Plan ~~and any local streetscape plan and any local streetscape plan. The streetscape improvements shall include: so that the public right-of-way is safe, accessible, convenient and attractive to persons walking.~~

- The recommended sidewalk width adjacent to the property, unless. If the recommended sidewalk width is determined to be infeasible or undesirable by City staff, then the minimum sidewalk width established in the Better Streets Plan must be provided in order to receive points for this TDM measure; AND
- The All required streetscape elements¹; AND one of the following:
- Five of the additional streetscape elements identified by City staff; OR
- The Development Project provides a minimum of two Safety Tools identified in the WalkFirst² toolkit if the Development Project is located on a High-Injury Corridor³.

Notes

1. Within Table 1 of Planning Code Section 138.1, streetscape elements that may be required include: 1 (Curb ramps), 2 (Marked crosswalks), 11 (Corner curb extensions or bulb-outs), 29 (Street trees), 30 (Tree basin furnishings), 31 (Sidewalk planters), 33 (Stormwater management tools), 34 (Street and pedestrian lighting), 35 (Special paving), 36 (Site furnishings).

2. Within Table 1 of *Planning Code* Section 138.1 ~~of the San Francisco Planning Code~~, property owners can choose from the following items, which reduce VMT/increase walking: 3 *(Pedestrian-priority signal devices and timings)*, 4 *(High-visibility crosswalks)*, 5 *(Special crosswalk treatments)*, 6 *(Restrictions on vehicle turning movements at crosswalks)*, 7 *(Removal or reduction of permanent crosswalk closures)*, 8 *(Mid-block crosswalks)*, 9 *(Raised Crosswalks)*, 12 *(Extended bulb-outs)*, 13 *(Mid-block bulb-outs)*, 14 *(Center or side medians)*, 15 *(Pedestrian or refuge islands)*, 16 *(Transit bulb-outs)*, 17 *(Transit boarding islands)*, 18 *(Flexible use of the parking lane)*, 19 *(Parking lane planters)*, 20 *(Chicanes)*, 23 *(Sidewalk or median pocket parks)*, 24 *(Reuse of 'pork chops' and excess right-of-way)*, 26 *(Shared public ways)*, 27 *(Pedestrian-only streets)*, 28 *(Public stairs)*, ~~32~~. The property owner can construct or install these items or provide funding to the City to construct or install them on the sidewalk or street right-of-way adjacent to and beyond the project site (but not to exceed 50 feet beyond the project site in any direction).
3. The property owner can construct or install the WalkFirst toolkit Safety Tools (<http://walkfirst.sfplanning.org/>), or provide funding to the City to construct or install them.
4. <http://walkfirst.sfplanning.org/index.php/home/streets>

2. ACTIVE-2 Bicycle Parking, Residential Land Use Category

Option A

- **Residential:** Class 1 and 2 bicycle parking spaces as required by the Planning Code.

Option B

- **Residential:** One Class 1 Bicycle Parking space for each Dwelling Unit For buildings containing more than 100 Dwelling Units, 100 Class 1 Bicycle Parking spaces plus one Class 1 spaces for every two Dwelling Units over 100, and Two Class 2 Bicycle Parking spaces for every 20 Dwelling Units.

Option C

- **Residential:** One and a half Class 1 Bicycle Parking spaces for each Dwelling Unit For buildings containing more than 100 Dwelling Units, 100 Class 1 Bicycle Parking spaces plus 1 Class 1 space for every 1.33 Dwelling Units over 100, and Three Class 2 Bicycle Parking spaces for every 20 Dwelling Units.

Option D

- **Residential:** For each Dwelling Unit, one ~~and half~~ Class 1 Bicycle Parking spaces or one Class 1 Bicycle Parking space for each bedroom, whichever is greater, and four Class 2 Bicycle Parking spaces for every 20 Dwelling Units.

MINOR (NON-SUBSTANTIVE) AMENDMENTS

1. 2.2 TDM PLAN STANDARDS (Page 5)

Any Development Project subject to the TDM Program shall submit a TDM Plan *Review* Application and administrative fee along with its first Development Application.

2. 2.2(a)(1) Planning Code Land Use Categorization (Page 8)

EXAMPLE 1

"A project proposes..."

Retail space is limited as land use category A. Land use category A has a base target of 13 points. For every additional two Accessory Parking spaces provided above four, rounding up, an additional point is required. Therefore, the land use category ~~C~~A target for this project is 14 points.

3. **2.2(b)(3) Development Projects With Multiple Buildings**

For Development Projects that include multiple buildings, selected physical TDM measures must be proportionately allocated amongst any land use on the a project's site; and/or readily identifiable and accessible to the residents, tenants, employees and/or visitors to a project's site.

4. **2.2(b)(~~3~~4) Development Projects With a Substantial Amount ~~Of~~ Parking (Page 11)**

Given no more TDM measures and points are available for these Development Projects, excluding the Parking Supply measure, the TDM Program Standards require these projects to include all measures and points, up to a 80% of the total number of points available, applicable for the land use category in the Development Project's TDM Plan. When using the TDM Tool, this percent reduction of the total number of points to achieve is automatically calculated. The rationale for setting the 80% requirement for these Development Projects is described in Chapter 4 of the TDM Technical Justification Document.

5. **2.2(d) TDM Plan Review (Page 14)**

The Planning Department will review each TDM Plan ~~Review~~ Application to ensure it is complete. Once deemed complete, the Planning Department will review to ensure the required target has been achieved by a selection of TDM measures for each land use category included in the Development Project. The TDM Plan shall be reviewed in conjunction with the first Development Project Approval. The requirement for a TDM Plan shall be incorporated as a Condition of Approval of the Development Project.

6. **FAMILY-3 Family TDM Package**

TDM MEASURE:

For residential Development Projects that meet the dwelling unit mix requirements in Planning Code Section 207.6(c)(e)(~~2~~), a property owner shall include all of the following measures:

APPLICABILITY:

This measure is applicable to residential Development Projects (land use category C), that meet the dwelling unit mix requirements in Planning Code Section 207.6(c)(~~2~~).

7. **HOV-1 Contributions or Incentive for Sustainable Transportation**

TDM MEASURE:

The Development Project (and subsequent property owners) shall proactively offer contributions or incentives to each Dwelling Unit and/or employee¹, at least once annually, for the Life of the Project. Such contributions or incentives shall be made to each Dwelling Unit and/or employee monthly. If requested accepted by a resident or employee, the property owner shall pay for contributions or incentives equivalent to the cost of a (~~25, 50, 75, or 100 percent~~) monthly Muni only "M" pass², or equivalent value in e-cash loaded onto Clipper Card, ~~per~~ for each Dwelling Unit, and/or employee. The amount of such contributions (25, 50, 75, or 100 percent) shall be based on the Options selected for this measure.

Examples of contributions or incentives include non-taxable monthly subsidies to support bicycle purchase and maintenance or public transit fare subsidies. Contributions or incentives

must be spent on eligible sustainable transportation purposes³. Ineligible expenses include: vehicle parking, personal vehicle purchase/lease/maintenance, for-hire ride hail services, tolls; or fines/citations. HOV-1 fulfills the Employer Paid Benefit option for projects subject to Environment Code Section 427. Commuter Benefits Program, if a 100 percent subsidized monthly Muni only "M" pass, or equivalent value in e-cash loaded onto Clipper Card is provided (Option D).

For guests at hotels and convention centers, the property owner shall ~~pay for~~ *proactively offer* contributions equivalent to 25, 50, 75, or 100 percent of the cost of a public transit day pass for each registered guest. At a minimum, the public transit day pass shall be equivalent to the costs associated with a Muni Visitor Passport for the number of days the visitor has booked travel, not to exceed a 7-day Visitor Passport, and, if the visitor indicates they are flying into San Francisco International Airport, a Bay Area Rapid Transit (BART) SFO Ticket Voucher.

Notes

1. Although the property owner may opt to provide a subsidy to all employees, the requirement is one subsidy per full time employee.
2. Any fare product, such as an institutional pass, that provides monthly full-access to Muni will be considered equivalent to providing the monthly Muni only "M" pass if provided at a rate of one pass per Dwelling Unit or employee.
3. Any contribution or incentive to a non-public transit or other transportation provider shall be subject to recommended for approval by from the SFMTA Director or designee.
4. Full compliance means that the property owner offers one subsidy per month per employee and/or Dwelling Unit regardless of whether or not the subsidies are accepted.

8. HOV-2 Shuttle Bus Service

DEVELOPMENT REVIEW:

The Development Project shall submit a conceptual service plan describing the hours of operation, stop location(s), routes, and headways for the shuttle service. The property owner shall also submit plans that identify the location and dimensions of potential shuttle stops at the project site and the proposed destination(s) stops. The plans should identify any other relevant information that may be helpful in understanding potential conflicts at the proposed shuttle stop locations (e.g., proximity to transit stops, crosswalks, etc.). If requesting loading zones from SFMTA, the property owner shall include documentation of these requests. *The property owner must also include documentation that the shuttle service plan has been sent to Carli Paine (carli.paine@sfmta.com) for SFMTA review.*

City staff will review the feasibility and adequacy of the proposed service plan, including the shuttle stop locations, and provide a staff recommendation regarding the shuttle stop locations and service. If SFMTA and Planning Department staff recommend the shuttle stop locations and service should be approved, City staff will assign TDM points based on the level of implementation.

9. LU-2 On-site Affordable Housing

TDM MEASURE:

The Development Project shall include on-site Affordable Housing, as defined in Planning Code Section 415, as research indicates that Affordable Housing units generate fewer vehicle trips than market-rate housing units. This measure is in recognition of the amount of on-site affordable housing a Development Project may provide as permitted by City law, as opposed to a requirement.

Option	PERCENTAGE OF UNITS BY INCOME RANGE		Points
	Low Income (Income > 55 ≤ 80%)	<u>Very</u> Low Income (Income ≤ 55%)	
OPTION A	≥ 5 ≤ 10%	≥ 3 ≤ 7%	● 1
OPTION B	> 10 ≤ 20%	>7 ≤ 14%	●● 2
OPTION C	> 20 ≤ 25%	>14 ≤ 20%	●●● 3
OPTION D	--	>20 ≤ 25%	●●●● 4