APPENDIX 4.17-1

VEHICLE MILES TRAVELED (VMT) ANALYSIS

MEMORANDUM

URBAN CROSSROADS

DATE: December 23, 2024
TO: Cory Wilkerson, City of Anaheim
FROM: Alex So, Urban Crossroads, Inc.
JOB NO: 15699-01 VMT

ANAHEIM HILLS FESTIVAL SPECIFIC PLAN AMENDMENT NO. 6 VEHICLE MILES TRAVELED (VMT) ANALYSIS

Urban Crossroads, Inc. has completed the following Vehicle Miles Traveled (VMT) Analysis for Anaheim Hills Festival Specific Plan Amendment No. 6 (Project), which is located south of Santa Ana Canyon Road and west of Roosevelt Road in the City of Anaheim.

PROJECT OVERVIEW

The existing Specific Plan is divided into four Development Areas (DA) by land use. DA 1 is the Scenic Commercial area fronting Santa Ana Canyon Road between Festival Drive and Roosevelt Road, DA 2 is the Regional Commercial use that contains the department stores, grocery, other food/retail uses, and the vacant cinema, DA 3 is the Visitor Commercial area located west of Festival Drive which includes the existing hotel, and DA 4 is the Senior Residential area south of Festival Drive. The Specific Plan Amendment (SPA) proposes the implementation of a new 16.2-acre mixed-use development area on the upper level of the commercial center as a new DA 5 (which is a portion of the old DA 2).

Specifically, the Project proposes to demolish the existing 62,676-square-foot vacant cinema and develop in its place 447 multi-family residential dwelling units while retaining the remaining existing commercial uses within the new DA 5. Approximately 13,310 square feet of existing retail would be retained in DA 2 as a result of the new DA 5 (resulting in a net reduction of 49,366 square feet of retail space). The retail within DA 5 will include the following existing uses: 6,475 square feet of restaurant use, 9,200 square feet of office use, 38,160-square-foot fitness/gym, 13,276 square feet of tutor/retail space, and 11,033-square-foot medical office building.

The SPA development area plan and Project site plan are included in Attachment A.

BACKGROUND

The California Environmental Quality Act (CEQA) requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the City of Anaheim developed and adopted their own City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis, (City Guidelines) (1). This VMT analysis has been developed based on the adopted City Guidelines.

VMT SCREENING

The City Guidelines state that a project may have a less than significant impact and screen out of requiring a “project level” VMT analysis if it meets at least one of the City’s VMT screening steps consistent with screening thresholds identified in the City Guidelines. The City’s adopted VMT screening types are described in Table 1 along with a determination of each screening step’s applicability to the Project.

TABLE 1: SCREENING FOR LAND USE PROJECTS EXEMPT FROM VMT ANALYSIS

Screening Types	Description	Result
1. Transit Priority Area (TPA) Screening	Projects located within a TPA (i.e., within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor) are presumed to have a less than significant impact on VMT.	Does not meet.
2. Low VMT Area Screening	Land use projects located within a low VMT-generating zone that can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area are presumed to have a less than significant VMT impact.	Does not meet.
3. Project Type Screening	Local-Serving Retail under 50,000 square feet, Local Essential Services, and projects generating less than 110 daily vehicle trips are presumed to have a less than significant impact on VMT.	Does not meet.

The Project does not meet any available screening steps. As required by the City Guidelines, a VMT analysis is required to evaluate the Project’s impact on VMT.

VMT ANALYSIS

TRAFFIC MODELING METHODOLOGY

City Guidelines identifies the Orange County Transportation Analysis Model (OCTAM), as the appropriate tool for conducting VMT analysis for land use projects in the City of Anaheim. OCTAM was developed by the Orange County Transportation Authority (OCTA) and initially released in June 2021. The most current release of OCTAM is version 5.0, representing the most current sub-regional transportation modeling tool for Orange County. OCTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. The calculation of VMT for land use projects is based on the total number of trips generated and the average trip length of each vehicle trip.

VMT ANALYSIS METHODOLOGY

For the purposes of this evaluation, VMT has been estimated using the Origin/Destination method and Boundary method. For both methods, VMT is presented as total VMT and VMT per Service Population (population plus employment). Total VMT is an estimate of total vehicle travel and considers all vehicle trips and trip purposes; whereas, VMT per service population (SP) is an efficiency metric that represents VMT generated on a typical weekday per person who lives and/or works in the City of Anaheim. Total VMT provides an estimate of the total vehicle travel, while VMT per SP measures the efficiency of travel. Consistent with City Guidelines, VMT per SP is recommended for transportation impact analysis.

ORIGIN/DESTINATION VMT

The Origin/Destination (OD) method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., County boundary) and tracks those trips to their estimated origins/destinations. Origins are all vehicle trips that start in a specific traffic analysis zone (TAZ) and destinations are all trips that end in a specific TAZ.

BOUNDARY VMT

City Guidelines also acknowledge that the VMT analysis should also contain an evaluation of a project's effect on VMT, which can be performed using the boundary method of calculating VMT. The boundary method is the sum of all weekday VMT on the roadway network within a designated boundary (i.e., 10-mile boundary). The boundary method estimates VMT by multiplying vehicle trips on each roadway segment within the boundary by that segment's length. This approach consists of all trips, including those trips that do not begin or end in the designated boundary. As the Project is on the eastern edge of the City of Anaheim, a 10-mile boundary was used as the boundary for this assessment in lieu of the City's boundary. A 10-mile boundary is appropriate for projects located near the boundary of the City to ensure trips are not truncated due to the City's boundary.

VMT METRIC AND SIGNIFICANCE THRESHOLD

The City Guidelines state that a Project would result in a significant project generated VMT impact if the following condition is met:

1. A project would result in a significant project-generated VMT impact if the baseline project-generated or cumulative project-generated VMT per SP exceeds 15% below the Orange County baseline VMT per SP.
2. The project's effect on VMT would be considered significant if the baseline or cumulative link-level boundary Citywide VMT per SP increases under the plus project condition compared to the no project condition.

ORANGE COUNTY BASELINE VMT PER SP

The Orange County baseline VMT per SP value has been calculated using OCTAM 5.0. Base year and cumulative year results were used to calculate the baseline condition using straight line linear interpolation. Table 2 presents the resulting Orange County baseline VMT per SP value of 25.7. Based on this, 15% below the Orange County baseline VMT per SP is 21.9.

TABLE 2: ORANGE COUNTY VMT PER SERVICE POPULATION

	Baseline[1]
SP	5,726,964
VMT	147,242,547
VMT per SP	25.7
City Threshold	21.9

[1]Baseline refers to OCTAM base year 2016.

PROJECT VMT ESTIMATES

PROJECT LAND USE CONVERSION

Project land use information must first be converted into an OCTAM compatible dataset. OCTAM utilizes socio-economic data (SED) (e.g., population, households, employment, etc.) instead of land use information for the purposes of vehicle trip estimation. Project land use information such as dwelling units must first be converted to SED for input into OCTAM. Adjustments in SED have been made to the appropriate TAZs within OCTAM to reflect the Project's proposed land uses (i.e., residential). Table 3 summarizes the population estimates for the Project. It should be noted that the population estimates are consistent with the population density factors identified in the California Department of Finance, Table 2: E-5 (January 2023).

TABLE 3: POPULATION ESTIMATES

Land Use	Quantity (DU)	Population Density Factor	Estimated Population
Residential	447	3.02 Persons per Household	1,350

BASELINE AND CUMULATIVE "PLUS PROJECT" CONDITIONS VMT CALCULATION

The values as calculated previously for the Project land use conversion are input into OCTAM for each of the Project's TAZs and OCTAM was run inclusive of the Project's SED changes. Table 4 identifies the VMT per SP of the Project's TAZs in the baseline plus project and cumulative plus project conditions.

TABLE 4: "PLUS PROJECT" VMT PER SERVICE POPULATION

	Baseline	Cumulative
SP	1,350	1,350
VMT	55,486	56,684
VMT per SP	40.7	42.0
City Threshold	21.9	21.9
Potentially Significant?	Yes	Yes

As shown in Table 4, the Project would exceed the City's VMT per SP impact threshold for baseline and cumulative conditions. The Project's VMT impact is therefore considered significant.

VMT REDUCTION STRATEGIES

The California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (Handbook) (2) has been utilized to determine trip reduction measures that may be applicable to the Project. The Handbook describes methods to quantify reductions in greenhouse gas emissions and, in the case of Transportation measures, the associated reductions to VMT. This evaluation will focus on a review of the Handbook's Transportation measures that are determined applicable to the Project.

SELECTING MEASURES

To determine which Transportation measures should be considered from the Handbook, land use type, scale, and locational context are each identified as key factors for determining an individual measure's applicability to a project. The Handbook contains a factsheet for each measure that describes the measure, locational context, scale of application, implementation requirements, and other considerations that should be reviewed to determine a measure's applicability.

PROJECT TYPE

Project type is an important consideration when determining which measures are applicable for consideration. For example, measures associated with neighborhood design are not applicable to an office project, whereas trip reduction programs intended to reduce employee commute VMT would not be applicable to a residential project.

SCALE

The Handbook identifies that measures can be applied at different scales or geographic levels, however, "some measures may only be applicable at the project-level, whereas others may be more appropriate within a broader planning context such as for a general plan or climate action plan." The geographic levels considered in the Handbook include Project/Site and Plan/Community. Project/Site applies to measures that can reduce VMT at the scale of an individual development project or employer. Plan/Community refers to measures that reduce VMT at the scale of a specific plan, general plan or climate action plan. Transportation measures can be quantified at either the Project/Site scale or the Plan/Community scale, but never both.[1]

LOCATIONAL CONTEXT

The Handbook describes locational context as "used to identify trip reduction measures within the transportation sector that are appropriate in certain types of neighborhoods differentiated by transportation characteristics and level of development (e.g., rural, suburban, and urban)." More specifically, rural, suburban, and urban are defined as follows:

[1] Handbook, Page 37

Rural: An area characterized by little development. Compared to urban and suburban areas, rural areas have a lower density of residences, higher numbers of single-family residences, and higher numbers of vehicle-dependent land use patterns. Where applicable, the Handbook provides three land use distinctions within the rural locational context category—R_a, R_b, and R_c. R_a refers to rural areas within a master-planned community. These rural areas often include a broad offering of amenities and services, which may be accessed by walking or other alternative forms of transportation. R_b refers to rural areas adjacent to a commuter rail station with convenient rail service to a major employment center. As the name implies, these rural areas have greater access to commuter rail as an alternative mode of transportation. R_c refers to rural areas with transit service and that are near jobs/services.

Suburban: An area characterized by dispersed, low-density, single-use, automobile dependent land use patterns, usually outside of the central city. Also known as a suburb.

Urban: An area located within the central city with higher density land uses than in the suburbs. Often characterized by multi-family housing, tall office buildings, and dense retail.

The City of Anaheim is often considered suburban due to its surroundings and borderline urban as the City contains a diverse mix of land uses and abundant amount of multi-family housing, dense retail, and employment-related uses. VMT reduction measures will herein evaluate the Project's locational context as urban. Attachment B provides a matrix of VMT mitigation measures available to an urban residential project.

PROJECT DESIGN FEATURES - VMT REDUCTIONS

As the reduction in trips and associated VMT could not be accurately accounted for by the calculations conducted using OCTAM, these adjustments are made through the following calculations as described in the Handbook.

T-1 Increase Residential Density

This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of dwelling units compared to the average residential density in the U.S. Increased densities affect the distance people travel and provide greater options for the mode of travel they choose. Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in VMT.

As the land use information that represents the Project was input into the OCTAM, any increased density over the National average that would reduce VMT is included in the VMT estimates in Table 4 and no additional VMT reduction credit is assumed.

T-4 Affordable Housing

This measure requires multi-family residential units to be permanently dedicated as affordable for lower income families. The California Department of Housing and Community Development (2021) defines lower-income as 80 percent of area median income or below, and affordable housing as costing 30 percent of gross household income or less.[2] Table 5 provides the calculation variables and formula used to calculate VMT reduction.

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[2] Handbook, Page 80

TABLE 5: T-4. AFFORDABLE HOUSING CALCULATION VARIABLES

ID	Variable	Value	Unit	Source
Output				
A	Percent reduction in GHG emissions from Project/Site VMT for multifamily residential developments	0-28.6	%	calculated
User Inputs				
B	Percent of multifamily units permanently dedicated as affordable	0-100	%	user input
Constants, Assumptions, and Available Defaults				
C	Percent reduction in VMT for qualified units compared to market rate units	-28.6	%	ITE 2021

$$A = B \times C$$

$$-2.86\% = 10\% \times -28.6\%$$

The Project is proposing 45 moderate income level housing units, or 10% of the total 447 dwelling units. As shown, the Project would reduce its project-generated VMT by 2.86% or 1,621 VMT.

T-15 Limit Residential Parking Supply

Limiting residential parking supply will reduce the total parking supply available at a residential project or site. Limiting the amount of parking available creates scarcity and adds additional time and inconvenience to trips made by private autos, thus disincentivizing driving as a mode of travel. Reducing the convenience of driving results in a shift to other modes and decreased VMT. Table 6 provides the calculation variables and formula used to calculate VMT reduction.

TABLE 6: T-15. LIMIT RESIDENTIAL PARKING SUPPLY CALCULATION VARIABLES

ID	Variable	Value	Unit	Source
A	Percent reduction in GHG emissions from VMT	0-13.7	%	calculated
User Inputs				
B	Residential parking demand	963	Parking Spaces	user input
C	Project residential parking supply	893	Parking Spaces	user input
D	Percentage of project VMT generated by residents	100	%	user input
Constants, Assumptions, and Available Defaults				
E	Percent of household VMT that is commute based	37	%	Caltrans 2012
F	Percent reduction in commute mode share by driving among households in areas with scarce parking	37	%	Chatman 2013

$$A = \frac{B - C}{B} \times D \times E \times F$$

$$-1.00\% = \frac{963 - 893}{963} \times 37\% \times 37\% \times 100\%$$

Consistent with the Parking Demand Study, dated October 2024 (Kimley-Horn), the Project is proposing to provide parking limited to 893 parking spaces, which is 70 parking spaces below the 963 parking spaces required by the City. As shown, the Project would reduce its project-generated VMT by 1.0% or 567 VMT.

MITIGATED PROJECT-GENERATED VMT COMPARISON WITH CITY THRESHOLD

The Project is estimated to reduce VMT by 2,188 VMT (1,621+567 VMT) with the inclusion of VMT-reducing project design features, as previously discussed. Table 7 shows the results of the project-generated VMT with the inclusion of VMT-reducing project design features, subsequent VMT per SP, and comparison to the City's adopted thresholds.

TABLE 7: PROJECT GENERATED VMT RESULTS

	Baseline	Cumulative
VMT	53,298	54,496
SP	1,350	1,350
VMT per SP	39.5	40.4
Threshold	21.9	21.9
Significant and Unavoidable	Yes	Yes

As shown in Table 7, with the inclusion of VMT-reducing project design features, the Project would continue to generate VMT per SP exceeding the City's adopted VMT impact threshold. The Project is considered to have a significant and unavoidable VMT impact.

PROJECT'S CUMULATIVE EFFECT ON VMT

Consistent with City Guidelines, in addition to evaluating the project VMT per SP (i.e., Population and Employees), the analysis must also evaluate the cumulative effects of the project on VMT. To complete this cumulative analysis, the analysis must compare the regional VMT per SP "with project" with "no project" VMT per SP. This analysis is performed using the boundary method, which includes all vehicle trips with one or both trip-ends within a specific geographic area of interest, a 10-mile boundary. Once the areawide VMT value is calculated, it is then normalized by dividing by the number of population and employees within the 10-mile boundary (in OCTAM). Baseline and Cumulative link-level boundary VMT per SP is calculated for both "No Project" and "With Project" conditions. If an increase occurs for the With Project condition as compared to No Project condition, then the impact is considered significant.

TABLE 8: 10-MILE REGIONAL VMT PER SERVICE POPULATION

	Baseline No Project	Baseline With Project	Cumulative No Project	Cumulative With Project
Service Population	1,838,146	1,839,372	2,053,769	2,054,995
VMT	33,792,563	33,751,368	37,810,182	37,634,232
VMT/SP	18.4	18.4	18.4	18.3
Change in VMT	0.0		-0.1	

As shown in Table 8, 10-Mile VMT per SP was found to remain unchanged in baseline condition and decrease under the cumulative condition. Therefore, the Project's cumulative effect on VMT is less than significant.

CONCLUSION

Based on the results of this analysis, the following findings are made:

- The Project was evaluated against VMT screening steps as outlined in the City Guidelines and was not found to meet applicable screening criteria.
- As required by the City Guidelines, non-screened projects are required to perform a project-level VMT analysis.
- The VMT analysis found the Project to exceed the City's adopted VMT per SP impact threshold for both baseline and cumulative conditions. **The project-generated VMT impact is significant and unavoidable**.
- The VMT analysis found the Project's cumulative effect on VMT to not increase in the baseline or cumulative conditions. **The Project's cumulative effect on VMT is less than significant.**

If you have any questions, please contact me at aso@urbanxroads.com.

REFERENCES

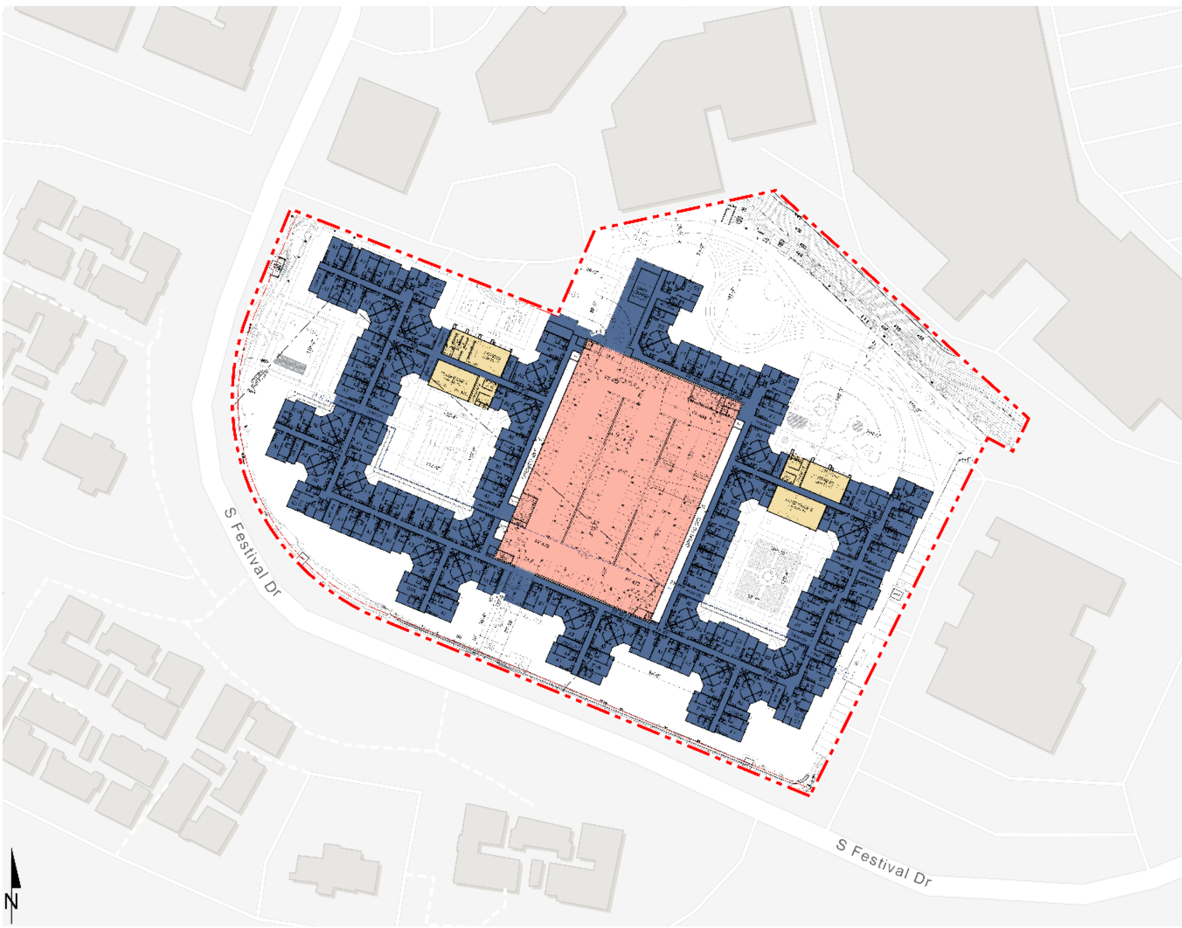
1. **City of Anaheim.** *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis.* City of Anaheim : s.n., June 2020.
2. **CAPCOA.** *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* . December 2021.

ATTACHMENT A

PRELIMINARY SITE PLAN

EXHIBIT A-1: SPA PROPOSED DEVELOPMENT AREAS

EXHIBIT A-2: PROJECT SITE PLAN



ATTACHMENT B

CAPCOA VMT REDUCTION MEASURES

Subsector	Measure	Scale of Application	Applicable Locational Context	Applicability to Project
Land Use	**T-1 Increase Residential Density** This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of dwelling units (du) compared to the average residential density in the U.S.	Project/Site	Urban, Suburban	Applicable.
	T-2 Increase Job Density This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of jobs compared to the average job density in the U.S.	Project/Site	Urban, Suburban	Not Applicable, Project is not employment related.
	T-3 Provide Transit-Oriented Development This measure would reduce project VMT in the study area relative to the same project sited in a non-transit-oriented development (TOD) location.	Project/Site	Urban, Suburban	Not Applicable due to the Project's location to available transit.
	T-4 Integrate Affordable and Below Market Rate Housing This measure requires below market rate (BMR) housing.	Project/Site	Urban, Suburban	Not Applicable, all units proposed are at market rate.
	T-17 Improve Street Connectivity This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of vehicle intersections compared to the average intersection density in the U.S.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
Parking or Road Pricing Management	**T-14 Provide Electric Vehicle Charging Infrastructure** Install onsite electric vehicle chargers in an amount beyond what is required by the 2019 California Green Building Standards (CALGreen) at buildings with designated parking areas (e.g., commercial, educational, retail, multifamily).	Project/Site	Urban, Suburban, Rural	Not Applicable, no reduction to VMT.
	T-15 Limit Residential Parking Supply This measure will reduce the total parking supply available at a residential project or site.	Project/Site	Urban, Suburban	Applicable.
	T-16 Unbundle Residential Parking Costs from Property Cost This measure will unbundle, or separate, a residential project's parking costs from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost.	Project/Site	Urban, Suburban	Applicable, but not feasible as increases in housing costs would not be consistent with State housing affordability goals.
	T-24 Implement Market Price Public Parking (On-Street) This measure will price all on-street parking in a given community, with a focus on parking near central business districts, employment centers, and retail centers.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
Neighborhood Design	**T-18 Provide Pedestrian Network Improvement** This measure will increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive.	Plan/Community	Urban, Suburban, Rural	Not Applicable in at the Project level.
	T-19A Construct or Improve Bike Facility This measure will construct or improve a single bicycle lane facility (only Class I, II, or IV) that connects to a larger existing bikeway network.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-19B Construct or Improve Bike Boulevard Construct or improve a single bicycle boulevard that connects to a larger existing bikeway network. Bicycle boulevards are a designation within Class III Bikeway that create safe, low-stress connections for people biking and walking on streets.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-20 Expend Bikeway Network This measure will increase the length of a city or community bikeway network. A bicycle network is an interconnected system of bike lanes, bike paths, bike routes, and cycle tracks. Providing bicycle infrastructure with markings and signage on appropriately sized roads with vehicle traffic traveling at safe speeds helps to improve biking conditions (e.g., safety and convenience). In addition, expanded bikeway networks can increase access to and from transit hubs, thereby expanding the "catchment area" of the transit stop or station and increasing ridership.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-21A Implement Conventional Carshare Program This measure will increase carshare access in the user's community by deploying conventional carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-21B Implement Electric Carshare Program This measure will increase carshare access in the user's community by deploying electric carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-22A Implement Pedal (Non-Electric) Bikeshare Program This measure will establish a bikeshare program. Bikeshare programs provide users with on-demand access to bikes for short-term rentals.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-22B Implement Electric Bikeshare Program This measure will establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric pedal assist bikes for short-term rentals.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-22C Implement Scootershare Program This measure will establish a scootershare program. Scootershare programs provide users with on-demand access to electric scooters for short-term rentals.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
Transit	**T-25 Extend Transit Network Coverage** This measure will expand the local transit network by either adding or modifying existing transit service or extending the operation hours to enhance the service near the project site.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-26 Increase Transit Service Frequency This measure will increase transit frequency on one or more transit lines serving the plan/community.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-27 Implement Transit-Supportive Roadway Treatments This measure will implement transit-supportive treatments on the transit routes serving the plan/community. Transit-supportive treatments incorporate a mix of roadway infrastructure improvements and/or traffic signal modifications to improve transit travel times and reliability.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-28 Provide Bus Rapid Transit This measure will convert an existing bus route to a bus rapid transit (BRT) system. BRT includes the following additional components, compared to traditional bus service: exclusive right-of-way (e.g., busways, queue jumping lanes) at congested intersections, increased limited-stop service (e.g., express service), intelligent transportation technology (e.g., transit signal priority, automatic vehicle location systems), advanced technology vehicles (e.g., articulated buses, low-floor buses), enhanced station design, efficient fare-payment smart cards or smartphone apps, branding of the system, and use of vehicle guidance systems	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
	T-29 Reduce Transit Fares This measure will reduce transit fares on the transit lines serving the plan/community.	Plan/Community	Urban, Suburban	Not Applicable in at the Project level.
Clean Vehicles and Fuels	**T-30 Use Cleaner-Fuel Vehicles**	Plan/Community	N/A	Not Applicable in at the Project level.