



**TOWN OF LOS GATOS  
JOINT STUDY SESSION WITH PLANNING COMMISSION  
AGENDA  
OCTOBER 08, 2019  
110 EAST MAIN STREET  
LOS GATOS, CA**

Steve Leonardis, Mayor  
Marcia Jensen, Vice Mayor  
Rob Rennie, Council Member  
Marico Sayoc, Council Member  
Barbara Spector, Council Member

**PARTICIPATION IN THE PUBLIC PROCESS**

**How to participate:** The Town of Los Gatos strongly encourages your active participation in the public process, which is the cornerstone of democracy. If you wish to speak to an item on the agenda, please complete a “speaker’s card” located on the back of the chamber benches and return it to the Clerk Administrator. If you wish to speak to an item NOT on the agenda, you may do so during the “Verbal Communications” period. The time allocated to speakers may change to better facilitate the Town Council meeting.

**Effective Proceedings:** The purpose of the Town Council meeting is to conduct the business of the community in an effective and efficient manner. For the benefit of the community, the Town of Los Gatos asks that you follow the Town’s meeting guidelines while attending Town Council meetings and treat everyone with respect and dignity. This is done by following meeting guidelines set forth in State law and in the Town Code. Disruptive conduct is not tolerated, including but not limited to: addressing the Town Council without first being recognized; interrupting speakers, Town Council or Town staff; continuing to speak after the allotted time has expired; failing to relinquish the podium when directed to do so; and repetitiously addressing the same subject.

**Deadlines for Public Comment and Presentations are as follows:**

- Persons wishing to make an audio/visual presentation on any agenda item must submit the presentation electronically, either in person or via email, to the Clerk’s Office no later than 3:00 p.m. on the day of the Council meeting.
- Persons wishing to submit written comments to be included in the materials provided to Town Council must provide the comments as follows:
  - For inclusion in the regular packet: by 11:00 a.m. the Thursday before the Council meeting
  - For inclusion in any Addendum: by 11:00 a.m. the Monday before the Council meeting
  - For inclusion in any Desk Item: by 11:00 a.m. on the day of the Council Meeting

***Town Council Meetings Broadcast Live on KCAT, Channel 15 (on Comcast) on the 1st and 3rd Tuesdays at 7:00 p.m.  
Rebroadcast of Town Council Meetings on the 2<sup>nd</sup> and 4<sup>th</sup> Mondays at 7:00 p.m.  
Live & Archived Council Meetings can be viewed by going to:  
[www.losgatosca.gov/Councilvideos](http://www.losgatosca.gov/Councilvideos)***

***IN COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT, IF YOU NEED SPECIAL ASSISTANCE TO PARTICIPATE IN THIS MEETING, PLEASE CONTACT THE CLERK DEPARTMENT AT (408) 354-6834. NOTIFICATION 48 HOURS BEFORE THE MEETING WILL ENABLE THE TOWN TO MAKE REASONABLE ARRANGEMENTS TO ENSURE ACCESSIBILITY TO THIS MEETING [28 CFR §35.102-35.104]***

**TOWN OF LOS GATOS  
JOINT STUDY SESSION WITH PLANNING COMMISSION AGENDA  
OCTOBER 08, 2019  
7:00 PM**

**JOINT TOWN COUNCIL AND PLANNING COMMISSION**

**SPECIAL MEETING CALLED TO ORDER**

**ROLL CALL**

**VERBAL COMMUNICATIONS** *(Members of the public are welcome to address the Town Council on any matter that is not listed on the agenda. To ensure all agenda items are heard and unless additional time is authorized by the Mayor, this portion of the agenda is limited to 30 minutes and no more than three (3) minutes per speaker. In the event additional speakers were not able to be heard during the initial Verbal Communications portion of the agenda, an additional Verbal Communications will be opened prior to adjournment.)*

**JOINT TOWN COUNCIL AND PLANNING COMMISSION**

1. Discussion of the Vehicle Miles Traveled Metric for Environmental Review and Local Transportation Analysis

**ADJOURNMENT** *(Council policy is to adjourn no later than midnight unless a majority of Council votes for an extension of time)*

*Writings related to an item on the Town Council meeting agenda distributed to members of the Council within 72 hours of the meeting are available for public inspection at the front desk of the Los Gatos Town Library, located at 100 Villa Avenue, and are also available for review on the official Town of Los Gatos website. Copies of desk items distributed to members of the Council at the meeting are available for review in the Town Council Chambers.*

*Note: The Town of Los Gatos has adopted the provisions of Code of Civil Procedure §1094.6; litigation challenging a decision of the Town Council must be brought within 90 days after the decision is announced unless a shorter time is required by State or Federal law.*



**TOWN OF LOS GATOS**  
**STUDY SESSION REPORT**

MEETING DATE: 10/08/2019

ITEM NO: 1

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DATE: October 3, 2019  
TO: Mayor, Town Council, and Planning Commission  
FROM: Laurel Prevetti, Town Manager  
SUBJECT: Discussion of the Vehicle Miles Traveled Metric for Environmental Review  
and Local Transportation Analysis

**RECOMMENDATION:**

Discussion of the Vehicle Miles Traveled metric for environmental review and local transportation analysis.

**BACKGROUND:**

On September 27, 2013, Governor Jerry Brown signed Senate Bill 743 into law and started a process intended to fundamentally change transportation impact analysis for California Environmental Quality Act (CEQA) compliance (see Attachment 1). Historically, most cities and towns, including Los Gatos, evaluate traffic based on intersection Level of Service (LOS). The Town's 2020 General Plan defines the Level of Service standard as, "LOS D is an acceptable level of traffic operations at intersections in Los Gatos." Under this transportation analysis standard, the Town directs the development project applicants to prepare CEQA transportation analysis using LOS as the metric.

The new law directed the Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines to include new criteria and metrics for determining the significance of transportation impacts. OPR selected vehicle miles traveled (VMT) as the transportation impact metric, recommended its application statewide, and submitted updates to the CEQA Guidelines that were certified by the Natural Resources Agency in December 2018.

While the LOS standard focuses on impacts at specific locations, such as an intersection and a street segment, VMT measures transportation impacts both at the project and in a larger geographic area, such as the region and the State. VMT is the measure of distance in miles that a vehicle travels, with one mile equivalent to one VMT. By measuring VMT, setting a baseline,

**PREPARED BY:** YING SMITH  
Transportation and Mobility Manager

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Reviewed by: Town Manager, Assistant Town Manager, Town Attorney, Community Development Director, and Parks and Public Works Director

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BACKGROUND (continued):

and setting targets in relation to that baseline, jurisdictions can affect the transportation impact future development projects might have on the environment. This allows for the jurisdiction to adopt strategies to achieve those targets.

Additional changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant environmental impacts under CEQA. As of January 1, 2018, vehicle LOS is no longer to be used as a measure of transportation impact for environmental/CEQA review of land use projects and land use plans; however, jurisdictions may retain a LOS standard in their local transportation policies. This way, the LOS analysis could be used as additional information to aid in the decision-making process that would be outside of the CEQA document.

The Town of Los Gatos is the lead agency for environmental clearance under CEQA for projects within the Town's jurisdiction. As such, the Town is required to implement the new CEQA guidelines immediately, but no later than July 1, 2020. Fehr & Peers has been hired to assist the Town in preparing CEQA Transportation Analysis Guidelines using VMT and any updates to the Town's local transportation policies, as the Council deems appropriate. The consultant will be joining staff at the Study Session to make the presentation, participate in the discussion, and answer questions. The purpose of the Study Session is to provide an introduction to the new requirements, concepts, and other provisions.

DISCUSSION:

According to the recently updated CEQA Guidelines, the Town's Transportation Analysis Guidelines should include: (1) a VMT analysis method, (2) impact thresholds that are supported by quantitative evidence, (3) determination of whether VMT impact screening is allowed, and (4) mitigation measures with associated VMT reduction impacts (see Attachment 2). In addition to the analysis method for land use projects, the Guidelines should also address analysis for transportation projects, Specific Plans, and General Plans. The Guidelines should also include an assessment of how the Town's General Plan would influence future transportation analysis.

In addition to the Transportation Analysis Guidelines, the Town Council may also decide to modify the Town's local transportation policies. These policies include those within the General Plan and the Town's Traffic Impact Policy. It is possible that General Plan modifications could lead to project streamlining. Should the Town Council decide to modify the policies, the changes would be reviewed as a part of the General Plan update process.

To help aid lead agencies with SB 743 implementation, OPR produced the *Technical Advisory on Evaluating Transportation Impacts in CEQA*. OPR recommends the following technical

DISCUSSION (continued):

considerations in implementing the use of VMT. In the next several months, Town staff, with support from a consultant, will return to Planning Commission and Town Council with options for consideration under each of the following questions. These questions are provided for the Study Session as a preview to the upcoming work. No decisions are expected at the Study Session.

**1. What is the preferred *VMT analysis* methodology for estimating and forecasting VMT? This metric is *currently* a required input for air quality, energy, Greenhouse Gas, and transportation impact analysis in CEQA.**

- The purpose of the *Technical Advisory* is to provide advice and recommendations, which agencies may use at their discretion. The Town will need to decide whether to follow *these* recommendations.
- If the Town decides to follow the *Technical Advisory* recommendations, the Town will then need to decide what travel forecasting model will be used to estimate baseline VMT for Town-wide and regional averages.
- The Town will also need to ensure that project-scale VMT analysis is consistent with the methodology used to estimate thresholds with respect to the magnitude of the comparable metrics.

**2. What are the significant *impact* thresholds for VMT impacts?**

- The *Technical Advisory* recommends that land use projects and plans within metropolitan planning organization (MPO) areas can achieve a 15 percent reduction in VMT per capita or per worker compared to existing conditions.
- The *Technical Advisory* recommends the 15 percent VMT reduction thresholds and two alternative thresholds from the California Air Resources Board (ARB). The ARB thresholds depend on the specific form of the metric and range from 14.3 to 16.8 percent. These thresholds were derived directly from ARB modeling related to VMT reductions necessary to support the State's GHG reduction goals.

**3. Does Los Gatos as the lead agency want to take advantage of VMT impact screening?**

- The *Technical Advisory* suggest that lead agencies may screen out VMT impacts using project size, location in low-VMT generating areas, transit availability, and provision of affordable housing.
- Some agencies also allow VMT impact screening projects based on their characteristics, such as local-serving retail projects, community serving public projects, etc.

DISCUSSION (continued):

**4. What mitigation does Los Gatos as the lead agency consider to be feasible for VMT impacts?**

- A list of potential mitigation measures and their associated VMT reductions will be prepared for the Town's consideration. These mitigation measures will be selected based on observed data collected in transportation and land use research.

CONCLUSION AND NEXT STEPS:

This Study Session is the first opportunity for the Town Council, Planning Commission, and the public to discuss this topic. The Town Council will need to provide specific direction on several issues at future meetings, leading to the final adoption of the Guidelines by May 2020. Based on additional analyses, in future meetings staff will bring back pertinent information and a few options for each issue for the Town Council's consideration. Staff has identified the following tentative schedule for future review of specific topics, with the presentation to the Planning Commission in the month identified and to the Town Council in the month following. Additional topics identified through the study session will be worked into this schedule.

December 2019– VMT Analysis Methodology

January 2020 – Impact Thresholds

February 2020 – Impact Screening

March 2020 – Mitigation Options

May 2020 – Adoption of Final VMT Policies

Town staff is also working with the Valley Transportation Agency on VMT implementation and as appropriate, this information will be part of the future discussions leading to the preparation of the Town's Transportation Analysis Guidelines.

Staff will conduct outreach to the general public and to the development community during the preparation of the Guidelines. The Town Council and Planning Commission are welcome to identify specific stakeholders for this process.

Staff looks forward to the discussion with the Town Council and Planning Commission.

COORDINATION:

This report was coordinated with the Community Development Department.

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SUBJECT: Discussion of the Vehicle Miles Traveled Metric for Environmental Review and  
Local Transportation Analysis

DATE: October 3, 2019

FISCAL IMPACT:

There is no fiscal impact as a result of this report.

ENVIRONMENTAL ASSESSMENT:

This is not a project defined under CEQA, and no further action is required.

Attachments:

1. Summary on Legal Framework of SB743 and technical background information
2. FAQ: Evaluating Transportation Impacts in CEQA

## Summary of Legal Framework of SB743 and Technical Background Information

### ***Legal Framework of SB743***

On September 27, 2013, Governor Brown signed Senate Bill 743 (Steinberg, 2013). Among other things, SB 743 creates a process to change analysis of transportation impacts under the California Environmental Quality Act (Public Resources Code section 21000 and following).

To help aid lead agencies with SB 743 implementation, Governor's Office of Planning and Research (OPR) produced the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018). The *Technical Advisory* helps lead agencies think about the variety of implementation questions they face with respect to shifting to a Vehicle Miles Traveled (VMT) metric.

The purpose of the *Technical Advisory* is to provide advice and recommendations, which agencies and other entities may use at their discretion. The guidance is not a recipe for SB 743 implementation since lead agencies must still make their own specific decisions about methodology, thresholds, and mitigation (i.e., each lead agency will bake a different looking and tasting SB 743 cake). Further, the document was intended to include guidance that would further statewide goals tied largely to greenhouse (GHG) reduction and does not attempt to balance or resolve potential conflicts between state goals with lead agency goals such as those expressed in local agency general plans.

Lead agencies will benefit from reflecting on the two legislative intent statements contained in the SB 743 statute.

1. More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.
2. Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through the California Environmental Quality Act.

These statements are important because they provide direction to OPR and to lead agencies. For OPR, the direction is largely about what new metrics should achieve. For lead agencies, the direction is about expected changes in transportation analysis (and related technical areas) plus what factors to consider for significance thresholds.

To implement this intent, SB 743 contains amendments to current congestion management law that allows cities and counties to effectively opt-out of the LOS standards that would otherwise apply. However, SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e. the general plan), fee programs, or on-going network monitoring,



but these metrics will no longer constitute the sole basis for CEQA impacts. Cities or counties can still use vehicle LOS outside of the CEQA process if they determine it is an important part of their transportation analysis process. The most common applications will likely occur for jurisdictions wanting to use vehicle LOS to size roadways in their general plan or determine nexus relationships for their impact fee programs. Jurisdictions can also continue to condition projects to build transportation improvements through the entitlement process in a variety of ways, such as using general plan consistency findings.

The CEQA Guidelines and the associated *Technical Advisory* are largely consistent with the legislative direction noted above such that impacts to transportation has shifted from a focus on changes to the driving experience to changes associated with driving. This new view presents an impact filter intended to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. VMT can help identify how projects (land development and infrastructure) influence accessibility (i.e., access to places and people) and emissions so its selection is aligned with the objectives of SB 743. Accessibility is an important planning objective in many communities but so is travel time or delay experienced by users.

### ***Background on the California Environmental Quality Act***

The California Environmental Quality Act (CEQA) was enacted in 1970. This statute requires identification of any significant environmental impacts of state or local action including approval of new development or infrastructure projects. The process of identifying these impacts is typically referred to as the environmental review process. A fundamental component of CEQA analysis is the determination of whether a project has the potential to significantly affect the physical environment. This determination requires careful judgment on the part of the lead agency and is based on scientific and factual data to the extent possible.

### ***Level of Service and Vehicle Miles Traveled***

**LOS** refers to “Level of Service,” a metric that assigns a letter grade to network performance. The typical application in cities is to measure the average amount of delay experienced by vehicle drivers at an intersection during the most congested time of day and assign a report card range from LOS A (fewer than 10 seconds of delay) to LOS F (more than 80 seconds of delay). The amount of delay is calculated relative to the amount of time to traverse the intersection if a vehicle is the sole vehicle on the road, and it arrives at a green light.

Traffic has long been a consideration in CEQA. In 1990, the Legislature linked implementation of congestion management plans, including LOS requirements, with CEQA. LOS has been an explicit part of CEQA analysis since at least the late 1990’s, when the sample environmental checklist in the CEQA Guidelines asked whether a project would exceed LOS standards. (See former CEQA Guidelines, App. G. § XV, Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or

other standards established by the county congestion management agency for designated roads or highways). Because of the linkage of the CEQA environmental checklist and LOS, historically, the Town and other jurisdictions have used Level of Service (LOS) as the significant impact threshold for transportation analysis under CEQA.

**VMT** refers to “Vehicle Miles Traveled,” a metric that accounts for the number of vehicle trips generated plus the length or distance of those trips. For transportation impact analysis, VMT is generally expressed as VMT per capita for a typical weekday. For instance, the 2012 average daily VMT per capita for the nine county Bay Area region was 15.3 miles per person per day.

***Town of Los Gatos’ current policies and requirements for transportation impact analysis***

The *Los Gatos 2020 General Plan* includes the following transportation policies:

Policy TRA-3.4 which states “New projects shall not cause the level of service for intersections to drop more than one level if it is at Level A, B, or C and not drop at all if it is at D or below.”

Policy TRA-3.5 which states “If project traffic will cause any intersection to drop more than one level if the intersection is at LOS A, B, or C, or to drop at all if the intersection is at LOS D or below, the project shall mitigate the traffic so that the level of service will remain at an acceptable level.”

Policy TRA-3.6 which states “Pedestrian and bicycle safety shall not be compromised to improve or maintain the level of service of an intersection.”

The Town’s *Traffic Impact Policy* (#1-05, March 2017) provides guidance in implementing the provisions of the Town Municipal Code, Chapter 15, Article VII, Traffic Impact Mitigation Fee. The Policy also defines the traffic impact analysis procedure, including the requirement of traffic impact analysis reports be consistent with the Transportation Impact Analysis Guidelines adopted by the Santa Clara Valley Transportation Authority.

The Town adopted a *Complete Streets Policy* in February 2019 (#3-01).

### ***Additional Information***

Governor's Office of Planning and Research Transportation Impacts (SB 743) website:

<http://opr.ca.gov/ceqa/updates/sb-743/>

*Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018

[http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

Town of Los Gatos *Traffic Impact Policy*

<https://www.losgatosca.gov/DocumentCenter/View/18175/1-05-Traffic-Impact-Policy?bidId=>

Town of Los Gatos *Complete Streets Policy*

<https://www.losgatosca.gov/DocumentCenter/View/22433/3-01-Complete-Streets-Policy>

## FAQ

## Evaluating Transportation Impacts in CEQA Based on New Guidelines as Directed by SB 743

### What was the legislative intent of SB 743 (2013)?

- 1 Balance the needs of congestion management with the following statewide goals: reduction of greenhouse gas emissions, infill development, and public health through active transportation
- 2 Ensure that the environmental impacts of traffic such as noise, air pollution, and safety concerns continue to be addressed and mitigated through CEQA

### What does the new CEQA Section 15064.3 adopted by the state in December 2018 require?

- 1 A project's effect on automobile delay (i.e., Level of Service) shall not constitute a significant environmental impact under CEQA
- 2 A lead agency may adopt these provisions immediately, but no later than July 1, 2020
- 3 VMT is the "most appropriate" measure of transportation impacts
- 4 Other relevant considerations may include effects on transit and non-motorized travel
- 5 VMT exceeding an applicable threshold may indicate a significant impact
- 6 Projects should be presumed to have a less than significant VMT impact if they are located in a transit priority area (TPA) or would reduce VMT
- 7 A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT
- 8 A lead agency may use models to estimate a project's VMT, and may revise those VMT estimates based on substantial evidence
- 9 Any assumptions used to estimate VMT must be documented and explained

### What are the current policies and requirements for transportation impact analysis in the Town of Los Gatos?

- 1 The current Los Gatos 2020 General Plan includes Policy TRA-3.4 which states "New projects shall not cause the level of service for intersections to drop more than one level if it is at Level A, B, or C and not drop at all if it is at D or below."
- 2 The current Los Gatos 2020 General Plan includes Policy TRA-3.5 which states "If project traffic will cause any intersection to drop more than one level if the intersection is at LOS A, B, or C, or to drop at all if the intersection is at LOS D or below, the project shall mitigate the traffic so that the level of service will remain at an acceptable level."
- 3 The current Los Gatos 2020 General Plan includes Policy TRA-3.6 which states "Pedestrian and bicycle safety shall not be compromised to improve or maintain the level of service of an intersection."

## FAQ

### Evaluating Transportation Impacts in CEQA Based on New Guidelines as Directed by SB 743

- 4 The Santa Clara Valley Transportation Authority (VTA) is the Congestion Management Agency (CMA) for Santa Clara County. VTA has a statutory role to work with its 15 Member Agencies on issues related to land use and transportation, through its Congestion Management Program (CMP). Signalized intersections that are designated CMP intersections and those controlled by Santa Clara County have an LOS E acceptable standard.

#### What is Vehicle Miles Traveled (VMT)?

- 1 VMT refers to "Vehicle Miles Traveled," a metric that accounts for the number of vehicle trips generated plus the length or distance of those trips. For transportation impact analysis, VMT is generally expressed as VMT per capita for a typical weekday. For instance, the 2012 average daily VMT per capita for the nine county Bay Area region was 15.3 miles per person per day.

#### What is Level of Service (LOS)?

LOS refers to "Level of Service," a metric that assigns a letter grade to network performance. The typical application is to measure the average amount of delay experienced by vehicle drivers at an intersection during the most congested time of day and assign a report card range from LOS A (fewer than 10 seconds of delay) to LOS F (more than 80 seconds of delay).

#### What is the California Environmental Quality Act (CEQA)?

- 1 CEQA refers to the California Environmental Quality Act. This statute requires identification of any significant environmental impacts of state or local actions including approval of new development or infrastructure projects. The process of identifying these impacts is typically referred to as the environmental review process.

## FAQ

## Evaluating Transportation Impacts in CEQA

Based on New Guidelines as Directed by SB 743

## What decisions does a local agency need to make to implement these new guidelines?

- 1 VMT Metric?
  - a VMT in absolute terms or
  - b VMT per capita, VMT per employee, and VMT per service population
- 2 VMT Methodology?
  - a How to calculate VMT – travel model, spreadsheet tool, other methods
  - b Total VMT or partial VMT associated with select vehicle types, land uses, and/or trip purposes/tours
  - c Project generated VMT versus project effect on VMT
  - d Same methodology for threshold setting and project analysis
- 3 VMT Impact Significance Threshold?
  - a Threshold: Level of reduction in VMT below existing conditions?
  - b Thresholds: (1) Project VMT and (2) Cumulative Impacts (project's effect on VMT)
  - c Thresholds: (1) Land Use Projects, (2) Land Use Plans, (3) Transportation Projects
  - d Is the level of VMT reduction compared to regional VMT, citywide VMT, or other baseline?
  - e For cities and counties, are VMT impacts best addressed at the general plan level given that all land use decisions only influence land use supply and CEQA Section 15183 provides streamlining for subsequent projects?
- 4 VMT Mitigation Options?
  - a VMT mitigation options for land use projects involve either changing the physical design of the project (i.e., its density, mix of use, street design, etc.) or requiring trip reduction strategies as part of a transportation demand management (TDM) program.
    - i Are cities and counties willing to require stringent TDM programs with annual monitoring and adjustments if projects do not accomplish required VMT reductions?
    - ii Should cities and counties instead rely on mitigation programs such as impact fee programs that are based on a VMT-reduction nexus?

## What are Infill Opportunity Zones (IOZs):?

Locations that meet location eligibility criteria for locally-adopted Infill Opportunity Zones as defined in the California Government Code, Section 65088.1(e):

Within ½ mile of a Major Transit stop, defined as any of the following:

- Existing rail stations
- Planned rail stations in an adopted Regional Transportation Plan
- Existing ferry terminals with bus or rail service

## FAQ

### Evaluating Transportation Impacts in CEQA Based on New Guidelines as Directed by SB 743

- Planned ferry terminals with bus or rail service in an adopted Regional Transportation Plan
- Intersection of at least two existing or planned bus routes with headways of 15 minutes or less during both the morning and evening peak periods; or
- Within a ½ mile of a High-Quality transit corridor, defined as an existing or planned fixed-route bus corridor with headway of 15 minutes or less during both the morning and evening peak periods

The Town has a small area around the planned Vasona Light Rail Station that is eligible as an Infill Opportunity Zone.