



## Memorandum

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**Date:** June 29, 2022  
**To:** Ms. Natalie Noyes, David J. Powers & Associates, Inc.  
**From:** Ollie Zhou  
**Subject:** Danville Housing Element Update Transportation Study

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Hexagon Transportation Consultants, Inc. has completed a transportation study for the proposed Danville Housing Element Update (HEU) project. The purpose of this study is to conduct a vehicle-miles travelled (VMT) analysis consistent with CEQA guidelines to determine whether the proposed HEU project would generate a VMT impact.

### Background

SB 743, which was signed into law in 2013, initiated a change how public agencies evaluate transportation impacts under the California Environmental Quality Act (CEQA). Traditionally, transportation impacts have been evaluated by examining whether the project is likely to cause automobile delay at intersections and congestion on nearby individual highway segments, and whether this delay will exceed local or regionally-defined thresholds of significance (this is known as Level of Service or LOS analysis).

Starting on July 1, 2020, agencies must analyze transportation impacts using a new metric known as vehicle miles traveled (VMT) instead of LOS. VMT is a metric that captures how much auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

### Opportunity Subareas

The HEU has identified 8 “HEU subareas” (see Figure 1) with a total capacity for 4,620 units<sup>1</sup>, as illustrated in Table 1.

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<sup>1</sup> It is anticipated that the Town will not ultimately include all candidate housing sites in the Housing Element, but will provide housing capacity for an additional 2,577 housing units consistent with RHNA requirements.



**Table 1  
Potential Unit Increase by HEU Subarea**

HEU Subareas	Potential New Units
Subarea #1	1,137
Subarea #2 - Downtown	1,523
Subarea #3	575
Subarea #4	108
Subarea #5	151
Subarea #6	412
Subarea #7	514
Subarea #8	200
<b>Subareas 1-8 (Total)</b>	<b>4,620</b>

### VMT Thresholds of Significance

Given that the Town of Danville has not formally adopted a local VMT policy, this study utilizes the Contra Costa Transportation Authority (CCTA)’s Growth Management Program Implementation Guide (the CCTA “Guide”). The Guide directs residential projects (such as the HEU) to use the *home-based VMT per capita* metric to evaluate their project generated VMT.

The project is considered to generate a **significant impact** if its project-generated home-based VMT per capita is *higher than 85% (or 15% below)* the existing town-wide baseline for residential home-based VMT per capita average.

Therefore, for this study, a HEU Subarea is considered to generate a significant impact if - under HEU buildout conditions (cumulative year 2031 + HEU) - the Subarea’s residential home-based VMT per capita exceeds 85% of existing baseline conditions (year 2020).

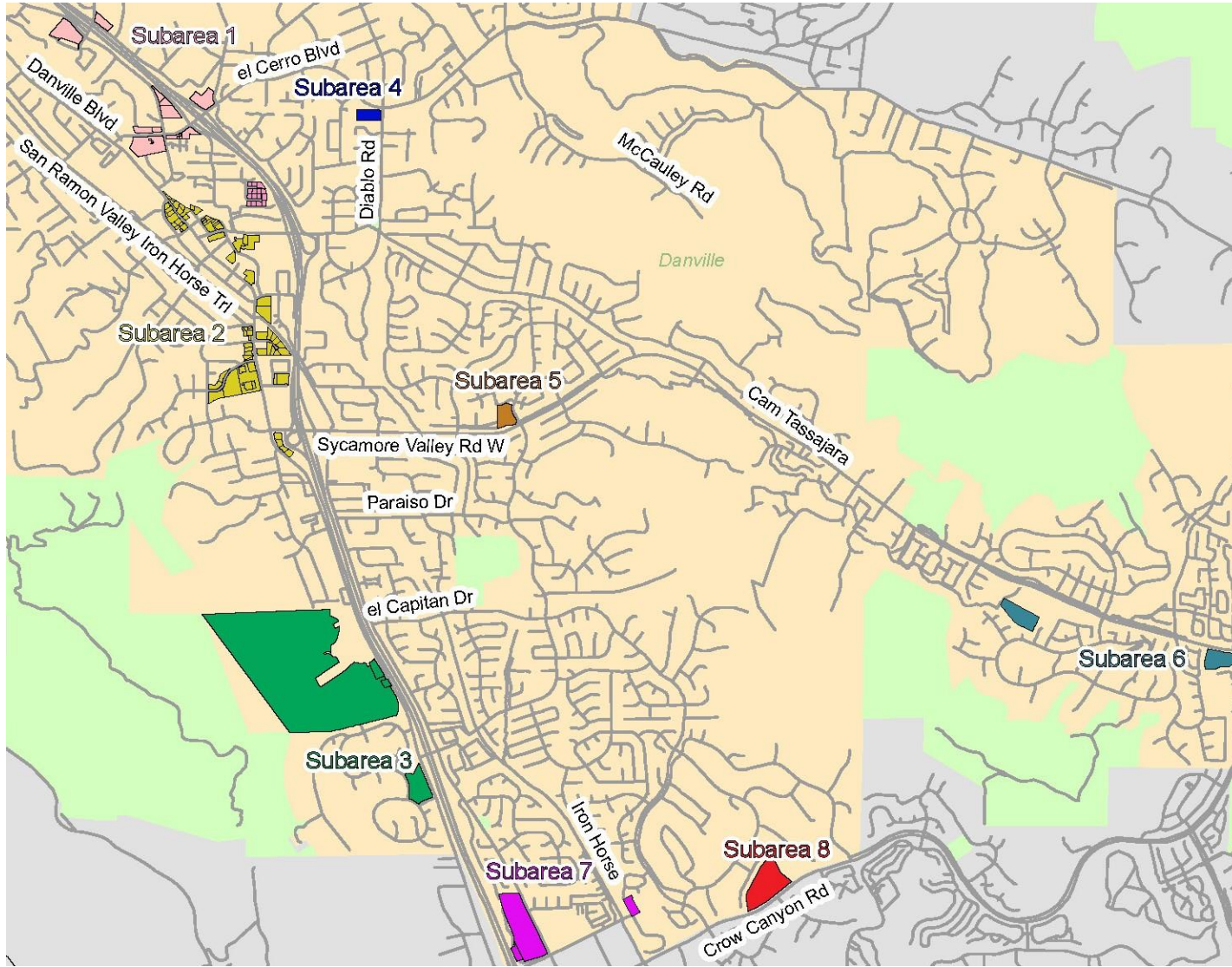
### VMT Threshold Analysis

VMT is defined as the total distance traveled by vehicles traveling to and from a land use over a typical day. The Contra Costa Transportation Authority (CCTA) travel demand forecast model was used to estimate the town-wide VMT threshold and the HEU’s VMT. The CCTA model is a mathematical representation of travel within the nine Bay Area counties. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and further refined by the CCTA for use within Contra Costa County. It is the best available model to represent travel within the Town of Danville and serves as the primary forecasting tool for the County and the Town.

There are four main components of the CCTA model: 1) trip generation, 2) trip distribution, 3) mode choice, and 4) trip assignment. The model uses socioeconomic inputs (i.e., population, income, employment) aggregated into geographic areas, called transportation analysis zones (TAZ) to estimate travel within the model area. There are 64 TAZs within the model to represent the Town of Danville.

For residential land uses, the VMT threshold is expressed in terms of home-based vehicle-miles travelled per capita. As estimated by the CCTA model (see land use summary below in Table 2), the Year 2020 town-wide average residential VMT is estimated at 22.3 daily VMT per capita. Therefore, the VMT threshold for this project, measured at 85% of the Town’s baseline average, is **19.0 daily VMT per capita** (see Table 3).

**Figure 1**  
**HEU Subareas**



## VMT Evaluation

The HEU has a buildout year of 2031. Therefore, VMT for the HEU Subareas are analyzed under year 2031 conditions. As discussed, the Cumulative Year 2031+HEU scenario is studying a capacity of 4,620 units (see Table 2) above existing conditions, spread across 8 HEU Subareas.

It is anticipated that the Town will not ultimately include all candidate housing sites within each of the HEU Subareas in the Housing Element. Rather, a more likely scenario is an adopted Housing Element that would provide sufficient housing capacity for additional housing units, plus a buffer, that is consistent with Danville’s RHNA assignment. Therefore, the residential land use assumptions studied in the model is a conservative overestimate of potential impacts.

Under the Cumulative Year 2031+HEU scenario, the HEU population is estimated using a persons per household ratio of 2.8 as published in the Department of Finance data for the Town for Year 2021. The Cumulative Year 2031 scenario represents the anticipated land use in Danville without the HEU, as projected by ABAG. Its land use projections are included for information only.

**Table 2  
Model Land Use Inputs Summary**

Scenario	Town of Danville			
	Households	Population	Employed Residents	Jobs
Year 2020 <sup>1</sup>	15,677	44,330	25,701	19,399
Cumulative Year 2031 <sup>1</sup>	16,470	46,750	26,520	19,319
Cumulative Year 2031 + HEU <sup>2</sup>	20,297	57,266	33,140	19,319

Notes:

- Land use data sourced from the CCTA model.
- Cumulative + HEU residential land use derived by adding HEU (4,620 units) onto existing land use. Jobs data assumed the same as Cumulative Year 2031 scenario. Population for HEU units assumed at 2.8 persons per household. Employed residents per HEU units assumed at 1.61, same as Cumulative Year 2031 scenario.

## Subarea-Level VMT Analysis

The CCTA model was run under the Cumulative Year 2031+HEU scenario. Table 3 shows that Subareas #2, #3, #7, and #8 would generate VMT per capita *below* the Town residential VMT threshold. This is primarily attributable to the fact that these Subareas are located in areas with complementary land uses that could shorten vehicle trip lengths or reduce the need to drive (hence reducing VMT per capita). Therefore, Subarea #2, #3, #7, and #8 VMT impacts would be considered **less than significant**.

Subarea #1 would generate VMT at 4% *above* the Town residential VMT threshold. The remaining Subareas #4, #5 and #6 would generate the most VMT at 13% to 18% *above* the Town residential VMT threshold. This is primarily attributable to the fact that these Subareas are not located in areas with a great mix of complementary land uses and residents need to drive more or travel further (hence increasing VMT per capita). These four subareas would generate a **significant impact** as defined by the Town’s per capita VMT threshold of significance described earlier. Potential VMT mitigation measures are discussed in the section below.



**Table 3  
Subarea-Specific VMT**

HEU Subareas	Proposed Households	Residential VMT Analysis	
		VMT per resident	Reduction Needed to Eliminate VMT Impact
<i>Town of Danville existing VMT</i>		22.3	-
<i>VMT Threshold (@ 85% of Town average)</i>		19.0	
<b><i>Cumulative Year 2031 + HEU Scenario</i></b>			
Subarea #1	1,137	19.8	4%
Subarea #2 - Downtown	1,523	18.8	No Impact
Subarea #3	575	16.7	No Impact
Subarea #4	108	21.8	13%
Subarea #5	151	22.3	15%
Subarea #6	412	23.2	18%
Subarea #7	514	16.7	No Impact
Subarea #8	200	18.6	No Impact
<b>Subareas 1-8 Total</b>	<b>4,620</b>	<b>19.1</b>	<b>1%</b>
<b>Notes:</b>			
* All data are generated by the CCTA model.			

**VMT Mitigation Discussion**

The Contra Costa Transportation Authority (CCTA)’s Growth Management Program Implementation Guide (CCTA’s Guide) outlined various VMT mitigation measures as well as their potential effectiveness.

Table 4 presents potential mitigation measures per CCTA’s Guide that could be applied towards the four HEU Subareas with VMT impacts. The potential mitigation measures are separated into project-scale strategies and community-wide strategies. Project-scale strategies would benefit only residents at the project sites, while community-wide strategies would also benefit the neighboring communities. Implementing community-wide strategies would require coordination with the Town and local transit agencies and/or via a Transportation Management Association. It should be noted that the range of effectiveness for these mitigation strategies depends not only on the intensity of the implementation, but also on the location context (high mixed-use areas, high transit-connected areas would likely result in more effective VMT reductions for the same strategy implemented).

The potential range of effectiveness of VMT reduction strategies by Subarea is summarized in Table 5. The project-scale mitigation reductions are calculated per the latest CAPCOA Handbook for Analyzing Greenhouse Gas Emissions, 2021 (see Appendix for detailed calculations). The community-scale mitigation reductions assumed the low end of the effective ranges provided by CCTA’s Guide. Danville presents a more suburban context with limited transit coverage or connectivity that is wholly provided through separate public agencies. Therefore, it should be expected that implementation of the strategies would result in VMT reduction on the lower end of the range of effectiveness.

**Table 4  
Potential Mitigation Strategies**

Strategy	Types of Trips Affected	Range of Potential VMT Reduction for Affected Trips
<b><u>Project-Scale Strategies</u></b>		
1 Increase land use diversity through greater mix of uses on site	All	0% - 12%
2 Implement ride-sharing program	Primarily commute trips	2.5% - 8.3%
3 Subsidize or discount transit passes	Primarily commute trips	0.1% - 16%
4 Incentivize telework and alternative schedules	Commute trips	0.2% - 4.5%
5 Price and manage parking	All	2% - 30%
<b><u>Community-Scale Strategies</u></b>		
6 Improve the pedestrian network	All	0.5% - 5.7%
7 Implement traffic calming and low-stress bicycle facilities	All	0% - 1.7%
8 Increase transit service frequency	All	0.3% - 6.3%
9 Implement neighborhood or community-wide car-sharing programs	All	0.3% - 1.5%
10 Coordinate school pools	School	7% - 15%
<b>Notes:</b> Source: CCTA's <i>Growth Management Program Implementation Guide</i>		

**Table 5  
Potential VMT Mitigation Strategies – Effectiveness by Subarea**

HEU Subareas	Resident VMT	Project-Scale Mitigation		Community-Scale Mitigation		Total Potential Reduction
		Applicable Strategies <sup>1</sup>	Potential Reduction <sup>2</sup>	Applicable Strategies <sup>1</sup>	Potential Reduction <sup>3</sup>	
Subarea #1	19.8	#2, #3, #5	-3.9%	#6, #8, #9	-1.3%	-5.2%
Subarea #2 - Downtown	18.8	#2, #3, #5	-3.9%	#6, #8, #9	-1.3%	-5.2%
Subarea #3	16.7	#2, #5	-3.4%	#6, #8, #9	-1.3%	-4.7%
Subarea #4	21.8	#2, #3, #5	-3.9%	#6, #8, #9	-1.3%	-5.2%
Subarea #5	22.3	#2, #3, #5	-3.6%	#6, #8, #9	-1.3%	-4.9%
Subarea #6	23.2	#2, #3, #5	-3.8%	#6, #8, #9	-1.3%	-5.1%
Subarea #7	16.7	#2, #3, #5	-3.5%	#6, #8, #9	-1.3%	-4.8%
Subarea #8	18.6	#2, #3, #5	-3.5%	#6, #8, #9	-1.3%	-4.8%
<b>Notes:</b>						
1. Mitigation strategies referenced the CCTA's Growth Management Program (GMP) Implementation Guide						
2. Project-scale mitigation reductions calculated per CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, 2021.						
3. Potential reduction assumed the lower end of the reduction range provided by the CCTA's GMP Implementation Guide.						

Table 6 provides a cumulative summary of potential effectiveness of VMT reduction strategies across all Subareas:

- Subarea #1 could feasibly fully mitigate their VMT impacts by implementing a combination of the applicable strategies through TDM Plans, achieving 5.2% VMT reductions, respectively. With such a TDM Plan, the VMT impact for Subarea #1 would be **less than significant with mitigation**.
- For remaining Subareas #4, #5 and #6, it would be unlikely that implementation of TDM Plans achieving high VMT reductions of 13%, 15%, and 18%, respectively, would be feasible given the suburban context of Danville. Therefore, the VMT impacts for Subareas #4, #5 and #6 would remain **significant and unavoidable**.

**Table 6  
Potential VMT Mitigation Strategies – Summary of Effectiveness**

HEU Subareas	Resident VMT	% Reduction Needed to Mitigate Impact	Total Potential Mitigation Reduction	Potential Net VMT	Result with Mitigation
Subarea #1	19.8	4%	5.2%	18.8	Less than Significant
Subarea #2 - Downtown	18.8	No Impact	5.2%	17.8	Less than Significant
Subarea #3	16.7	No Impact	4.7%	15.9	Less than Significant
Subarea #4	21.8	13%	5.2%	20.7	<b>Significant and Unavoidable</b>
Subarea #5	22.3	15%	4.9%	21.2	<b>Significant and Unavoidable</b>
Subarea #6	23.2	18%	5.1%	22.0	<b>Significant and Unavoidable</b>
Subarea #7	16.7	No Impact	4.8%	15.9	Less than Significant
Subarea #8	18.6	No Impact	4.8%	17.7	Less than Significant
Total (Subareas #1 - #8)	19.1	1%	5.0%	18.2	Less than Significant

**Plan-Level VMT Analysis**

As shown on Table 3, the Housing Element Update (HEU Plan) – assuming an approval of all 4,620 units in the 8 subareas - would generate residential VMT at 19.1 VMT per capita under the Cumulative Year 2031+HEU scenario. Therefore, the HEU Plan would require a total VMT reduction of 1% to meet the Town’s threshold of 19.0 residential home-based VMT per capita.

As shown on Table 6, it would be feasible for units within the HEU Plan to achieve a *combined* 5% VMT reduction by implementing a combination of the project-scale and community-scale strategies. With such a Plan-level requirement, the VMT impact for the HEU Plan would be *less than significant with mitigation*. It should be noted that this analysis is specific to the specific mix of units and locations analyzed in this report.

**Effect of HEU on Town-Wide VMT**

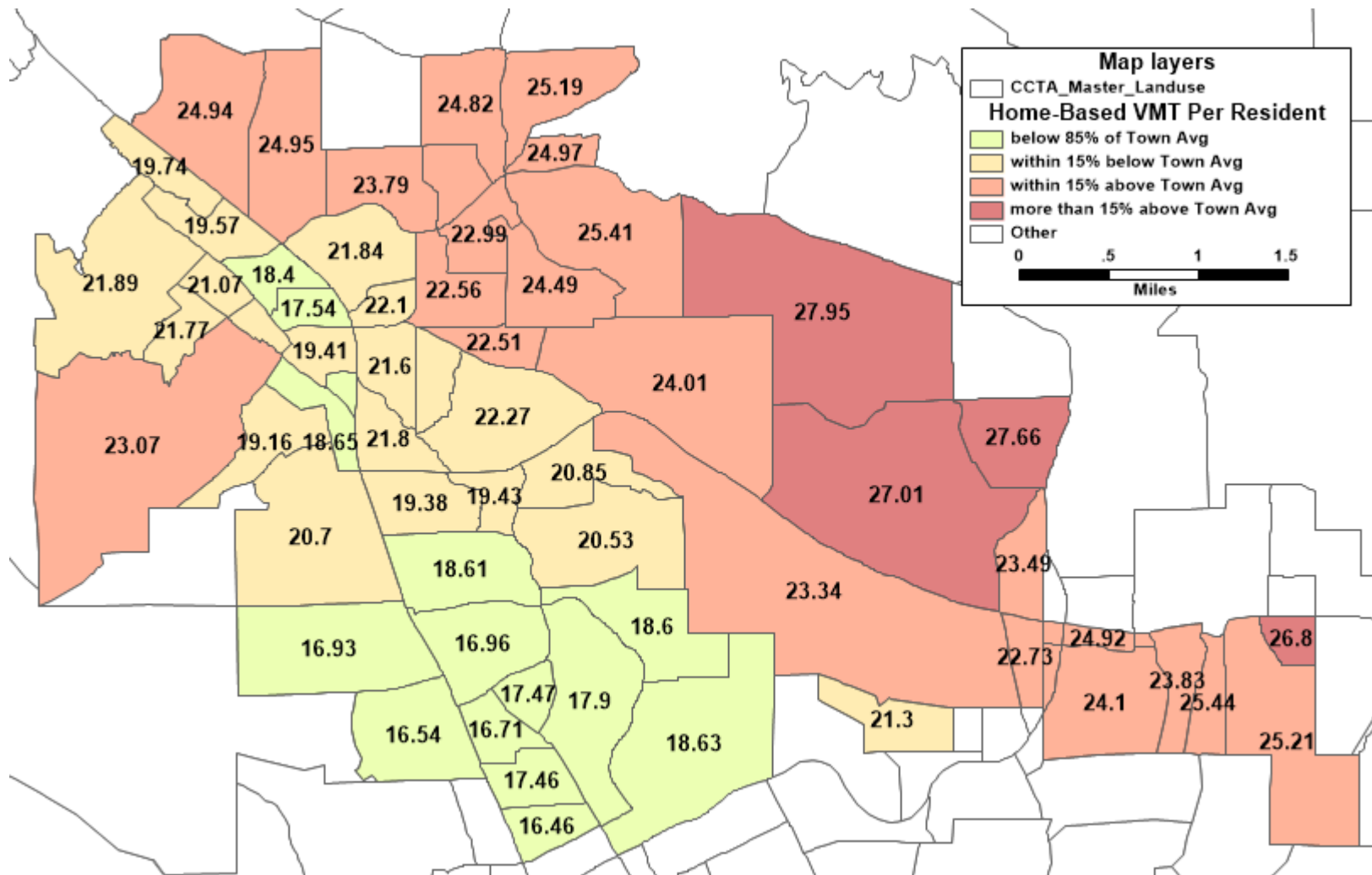
Town-wide residential VMT per capita for the Cumulative Year 2031+HEU scenario was compared to the Cumulative Year 2031 without HEU for information only. As shown on Table 7, the proposed HEU update would reduce town-wide residential VMT per capita by approximately 1%, from 21.4 under Cumulative Year 2031 conditions to 21.1. Compared to existing conditions, the proposed HEU update would reduce town-wide residential VMT per capita by approximately 5%, from 22.3 under Existing Year 2020 conditions to 21.1. This is because most of the potential housing development are located in areas where the residential VMT is lower than the town-wide average (see Figure 2).

**Table 7  
Effect of HEU on Town-Wide Residential VMT**

Scenario	Town of Danville		
	Home-Based VMT	Population	Residential VMT per capita
Existing Year 2020	988,559	44,330	22.3
Cumulative Year 2031	1,000,450	46,750	21.4
Cumulative Year 2031 + HEU	1,208,313	57,266	21.1



**Figure 2**  
**Year 2031 + HEU Conditions Residential VMT by TAZ**



## **Appendix A**

### **Danville Land Use Inputs – Cumulative Year 2031**



40049	177	486	276	174	2	15	2	6	4	0	1	0	0	0	0	0
40050	838	2304	1305	826	11	307	41	142	106	0	6	8	0	0	0	0
40051	911	2500	1418	898	12	526	53	247	199	0	12	14	0	0	0	0
40052	243	692	390	177	65	9	9	0	0	0	0	0	0	0	0	0
40053	450	1273	720	329	121	1223	193	460	498	2	23	45	0	0	0	0
40054	65	177	88	36	28	0	0	0	0	0	0	0	0	0	0	0
40056	194	533	302	191	2	757	757	0	0	0	0	0	0	0	0	0
40057	14	40	20	8	6	121	14	60	40	0	3	2	0	0	0	0
40058	101	304	168	99	2	74	74	0	0	0	0	0	0	0	0	0
40059	19	63	34	19	0	1038	218	435	328	1	41	11	0	0	0	0
40060	10	33	18	10	0	18	2	8	5	0	1	0	0	0	0	0
40061	584	1897	1035	568	16	362	112	130	101	0	13	3	0	0	0	0
40062	134	451	238	130	3	43	43	0	0	0	0	0	0	0	0	0
40063	100	372	180	97	2	42	6	19	12	0	3	1	0	0	0	0
40064	491	1740	821	477	13	132	25	61	43	0	1	0	0	0	0	0
40600	131	427	233	128	3	100	17	45	31	0	3	0	0	0	0	846

## **Appendix B**

### **Danville Land Use Inputs – Cumulative Year 2031 + HEU**





40049	161	445	257	159	2	15	2	6	4	0	1	2	0	0	0	0
40050	902	2503	1444	822	80	307	41	142	106	0	6	11	0	0	0	0
40051	1104	3049	1760	894	210	526	53	247	199	0	12	15	0	0	0	0
40052	242	687	400	192	50	9	9	0	0	0	0	0	0	0	0	0
40053	743	2083	1205	237	506	1223	193	460	498	2	23	47	0	0	0	0
40054	65	177	92	38	27	0	0	0	0	0	0	0	0	0	0	0
40056	285	792	457	191	94	757	757	0	0	0	0	0	0	0	0	0
40057	14	40	20	8	6	121	14	60	40	0	3	4	0	0	0	0
40058	101	299	169	99	2	74	74	0	0	0	0	0	0	0	0	0
40059	19	63	34	19	0	1038	218	435	328	1	41	14	0	0	0	0
40060	10	32	18	10	0	18	2	8	5	0	1	2	0	0	0	0
40061	578	1865	1032	563	15	362	112	130	101	0	13	5	0	0	0	0
40062	133	443	239	130	3	43	43	0	0	0	0	0	0	0	0	0
40063	99	361	180	97	2	42	6	19	12	0	3	2	0	0	0	0
40064	469	1646	805	457	12	132	25	61	43	0	1	2	0	0	0	0
40600	131	421	233	127	4	100	17	45	31	0	3	3	0	0	0	846

## Appendix C

### Danville TAZ Level VMT Results

TAZ	Residential VMT per Capita		
	Year 2020	Year 2031	Year 2031 + HEU
40064	24.0	24.4	25.2
40063	23.9	24.3	25.4
40062	25.3	23.4	23.8
40600	25.5	26.3	26.8
40012	22.7	22.5	23.1
40051	20.8	18.5	18.6
40050	19.9	17.7	17.9
40049	20.4	18.4	18.6
40047	24.2	23.0	23.3
40053	19.4	16.8	16.5
40052	19.4	16.9	17.5
40028	18.5	16.1	16.7
40026	18.8	16.4	17.0
40025	19.2	18.0	18.6
40041	23.7	23.6	24.0
40042	27.2	26.6	27.0
40043	26.4	23.1	23.5
40030	19.2	17.2	16.9
40031	21.0	20.4	20.7
40048	20.7	20.1	20.5
40046	21.1	20.5	20.9
40024	20.2	19.0	19.4
40022	22.3	22.0	22.3
40023	20.1	18.9	19.4
40021	21.9	21.4	21.8
40037	24.1	24.0	24.5
40036	25.1	24.9	25.4
40045	27.9	27.6	27.9
40044	27.8	27.0	27.7
40013	21.3	21.0	19.2
40014	20.7	20.5	18.6
40038	22.8	22.6	23.0
40032	24.0	24.1	24.8
40035	24.1	24.5	25.0
40034	24.4	24.8	25.2
40029	18.4	16.6	16.5

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40027	19.6	17.1	17.5
40015	19.9	19.6	18.4
40016	20.8	20.3	19.4
40019	21.4	21.4	21.6
40020	22.2	22.0	22.3
40018	19.7	19.3	17.5
40017	20.8	20.5	21.5
40005	22.0	21.4	22.1
40004	21.8	21.7	21.8
40008	20.3	20.2	18.4
40002	24.4	24.8	24.9
40003	22.9	23.3	23.8
40009	20.7	20.7	21.1
40001	24.2	24.6	24.9
40011	21.8	21.6	21.8
40007	20.9	20.6	19.6
40010	21.7	21.6	21.9
40006	21.2	21.1	19.7
40040	22.1	22.1	22.5
40039	22.3	22.2	22.6
40033	24.0	24.3	24.8
40061	25.0	23.7	24.1
40056	26.4	22.9	22.7
40054	22.0	20.5	21.3
40057	26.3	23.7	23.7
40059	26.1	24.8	24.9
40060	25.1	22.3	23.1
40058	25.0	23.6	24.2

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## Appendix D

### Project-Scale VMT Mitigation Calculations

	Implement Ridesharing Program							
	Subareas							
	1	2	3	4	5	6	7	8
<b>VMT Reduction</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>	<b>-1.48%</b>
<b><u>Variables</u></b>								
HBW VMT as a percentage of HB VMT <sup>1</sup>	37%	37%	37%	37%	37%	37%	37%	37%
% of residents eligible <sup>2</sup>	100%	100%	100%	100%	100%	100%	100%	100%
Percent reduction in employee commute VMT <sup>3</sup>	-4%	-4%	-4%	-4%	-4%	-4%	-4%	-4%
<b>Notes:</b>								
Referenced formula for T-8 in CAPCOA's <i>Handbook for Analyzing GHG Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</i> , December 2021.								
1. Assumption per CAPCOA								
2. Assumption that program will be available to all residents								
3. Table T-8.1 for Suburban area								

Implement Subsidized or Discounted Transit Program								
	Subareas							
	1	2	3	4	5	6	7	8
<b>VMT Reduction</b>	<b>-0.51%</b>	<b>-0.51%</b>	<b>0.00%</b>	<b>-0.49%</b>	<b>-0.19%</b>	<b>-0.46%</b>	<b>-0.16%</b>	<b>-0.12%</b>
<b><u>Implementation Requirement (Y/N)</u></b>								
Project within 1 mile of high-quality (headway<15 min) transit, <u>or</u>	N	N	N	N	N	N	N	N
Project within 0.5 mile of local/less frequent transit, <u>or</u>	Y	Y	N	Y	Y	Y	Y	Y
Project along a designated shuttle route providing last-mile connections to rail service, <u>or</u>	N	N	N	N	N	N	N	N
If well-established bikeshare service available, project within 2 miles of high-quality transit	N	N	N	N	N	N	N	N
Meet requirement? (at least one Y)	Y	Y	N	Y	Y	Y	Y	Y
<b><u>Variables</u></b>								
Average transit fare without subsidy <sup>1</sup>	\$2	\$2	-	\$2	\$2	\$2	\$2	\$2
Subsidy amount <sup>1</sup>	\$2	\$2	-	\$2	\$2	\$2	\$2	\$2
% of residents eligible for subsidy <sup>2</sup>	100%	100%	-	100%	100%	100%	100%	100%
% of project-generated VMT from residents <sup>3</sup>	100%	100%	-	100%	100%	100%	100%	100%
Transit mode share of all trips or work trips <sup>4</sup>	2.4%	2.4%	-	2.3%	0.9%	2.2%	0.7%	0.6%
<b><u>Constants</u></b>								
Elasticity of transit boardings with respect to transit fare price	-0.43	-0.43	-0.43	-0.43	-0.43	-0.43	-0.43	-0.43
% of transit trips that would otherwise be made in a vehicle	50%	50%	50%	50%	50%	50%	50%	50%
Conversion factor of vehicle trips to VMT	1	1	1	1	1	1	1	1
<b><u>Notes:</u></b>								
Referenced formula for T-9 in CAPCOA's <i>Handbook for Analyzing GHG Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</i> , December 2021.								
1. Assume that transit fare will be fully subsidized. \$2 is an arbitrary value and since the subsidy amount equals the average fare, the numeric value is inconsequential.								
2. Assumption that program will be available to all residents								
3. Projects are assumed to be fully residential								
4. From the CCTA model								

Unbundle Residential Parking Costs from								
	Subareas							
	1	2	3	4	5	6	7	8
<b>VMT Reduction</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>	<b>-1.9%</b>
<b><u>Variables</u></b>								
Annual parking cost per space <sup>1</sup>	\$432	\$432	\$432	\$432	\$432	\$432	\$432	\$432
<b><u>Constants</u></b>								
Average annual vehicle cost	\$9,282	\$9,282	\$9,282	\$9,282	\$9,282	\$9,282	\$9,282	\$9,282
Elasticity of vehicle ownership with respect to total vehicle cost	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40	-0.40
Adjustment factor from vehicle ownership to VMT	1.01	1.01	1.01	1.01	1.01	1.01	1.01	1.01
<b>Notes:</b>								
Referenced formula for T-16 in CAPCOA's <i>Handbook for Analyzing GHG Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</i> , December 2021.								
1. Assuming \$36 per space per month, per T16.1								