

MEMORANDUM

To: Leigh Lutenski, Balboa Reservoir CAC
From: Michael H. Ahrens, Member BRCAC
Dated: April 26, 2020
Re: Unresolved Parking Demand by City College

Thank you for publishing the response of Reservoir Community Partners (“RCP”) to the questions posed by members of the CAC and the public relating to the Design Standards and Guidelines (“DSG”) discussed at the prior BRCAC meeting. (“RCP Response”), as well as the RCP “Balboa Reservoir TDM” dated April 2020 (“RCP TDM”). I plan to comment verbally on both as a member of the CAC at Monday’s meeting. However, since the meeting is virtual I felt it would be best to put some of my comments in writing in advance of the meeting and request that these comments be put on the BRCAC website in advance of the meeting.

1. RCP Response and RCP TDM

At page 3 of the RCP Response, responding to a question by Chris Hanson in her April 8, 2020 email, RCP responds as follows:

“RCP references a CCSF commissioned study by Fehr and Peers (March 2019). This study reports on parking counts conducted in June of 2018 and the first week of the semester in August of 2018. Based on these surveys and a consideration of CCSF growth, the current parking need is projected at 220 spaces. RCP is required to continue to collect data in the coming years prior to constructing the public parking to determine the actual need, the City will review and approve the analysis determining the final size of the public parking.”

In addition, at the Planning Commission Meeting the City similarly represented to the Planning Commission that the current parking need is 220 spaces.

Both of these comments mischaracterize the facts and the Fehr & Peers TDM and Parking Plan dated Mach 15, 2019, prepared for CCSF. (“Fehr TDM”).

A presentation was made by CCSF to the CAC at the June 10, 2019 meeting. It consisted of a 19 page document entitled “CAC Briefing” that summarized CCSF’s Facilities Master Plan, including its plans for the Performing Arts Center (“PAEC”) to be built on CCSF’s upper East Lot as part of CCSF’s development. (“CAC June 2019 Briefing”) The CAC June 2019 Briefing is part of the BRCAC minutes and Website for anyone to review.

The CAC June 2019 Briefing by CCSF included only one slide entitled “Baseline + Balboa Reservoir Housing Parking Demand and Supply.” The source of that slide

was “City College of San Francisco Transportation Demand Management (TDM) and Parking Plan March 15, 2019 Table 13.” This CCSF TDM, prepared by Fehr and Peers, was not presented to the CAC at the June 10, 2019 meeting.

After this June 10 meeting I requested a copy of the full Fehr & Peers TDM. That Fehr & Peers TDM was sent in late June 2019 to the members of the BRCAC by an email from the Chair of the BRCAC. It was never sent to the public and was never put in the public record. I hereby request that it be put in the public record for review in advance of the April 27, 2020 CAC meeting by CAC members and the public.

The CAC June 2019 Briefing only included Table 13 from the Fehr & Peers TDM. Yes, one of the numbers in Table 13 was that under certain contingencies there would be only a shortage of 220 parking spaces. But, more significantly, Table 13 recognized that there would be a shortage of 1,007 spaces with core TDM measures during peak times, and a minimum need of 614 spaces on a baseline day and 1,540 spaces on peak periods without TDM.

Furthermore, not only does a shortage of 220 parking spaces not refer to the full picture, it uses the wrong Chart from the source material, the Fehr & Peers TDM. Table 13 in the Fehr & Peers report assumes only a development on the West Lot by RCP. But, with the \$850 million bond now approved by voters, it is certain that CCSF will be following its own planned development on the East Lot, which it owns. That includes construction of the Performing Arts Center (“PAEC”). Table 13 of The Fehr & Peers Report does not consider these additional projects, and is, therefore, not the Table that should be considered in an analysis of the loss of parking.

The Table in the Fehr & Peers report that must be considered when analyzing loss of parking should be Table 14, which includes an analysis of the Parking Demand and Supply taking into consideration both Balboa Reservoir Housing development by RCP and the construction of the PAEC by CCSF on the East Lot. That Table 14 is the only analysis that should be reviewed in light of the new funding for the PAEC and the promises by CCSF that construction of the PAEC will commence in 2021.

Table 14 of the Fehrs and Peer TDM shows that with TDM there will be an unserved demand of 980 spaces on low demand days. But, it also shows that with TDM on the peak times there will be an unserved demand of 1,767 spaces. Assuming no TDM, under Table 14 for low demand days the parking deficiency is 1,374 spaces and for peak times the deficiency is 2,300 spaces.

The fact of the matter is that the projected growth of CCSF in the Fehr & Peers TDM was much too conservative. It assumed a growth between 2018 and 2026 of 25%. But in the Draft Subsequent Environmental Impact Report, dated August 7, 2019 (“DSEIR”) it is stated that the CCSF Master Plan itself assumes an increase of 55% of the students between 2018 and 2026. [DSEIR, page 3.A-10]. Hence, the deficiency of spaces in Table 14 should be significantly increased since the Fehr & Peers TDM assume an increase that was much too low.

In addition, there are no guarantees that any of the TDM suggestions contained in the Fehr & Peers TDM will be adopted. A careful review of the RCP TDM with the Fehr & Peers TDM shows that many of the suggestions in the Fehr & Peers TDM were not referenced in the RCP TDM. Moreover, TDM measures are expensive and there is no guaranty that either CCSF or RCP will adopt any of the TDM suggestions.

Even if some of the TDM measures may help reduce the parking needs, and even if the developer and/or CCSF say that they plan to adopt the measures,, there is no assurance that they will be adopted and/or funded.

In fact, there is no guaranty that RCP will adopt any of their suggestions. In the RCP TDM it is stated on page two as follows: "Specific TDM measures will be selected by the developer from this approved tool kit." And, on page 3 RCP states if there are changes the TDM "shall be updated accordingly." There are no assurances that these TDM matters, called "Targets" will remain in the either the RCP development or the CCSF Facilities development.

2. No Solution to Unserved Parking Demand

As set forth in the prior section of these comments, the Parking Unserved Demand is understated in the Fehr & Peers TDM and greatly exceeds the 220 spaces reported to the Planning Commission and referred to in the RCP Response. Both the City and CCSF admitted at the June 10, 2019 meeting that there had been no resolution solving this Parking Demand, and stated they would work to solve it.

Until the Unserved Parking Demand is adequately addressed this development should not proceed to the final entitlements stage.

At the SF PUC hearing on November 14, 2017 certain PUC commissioners stated that they recognized the unique need of CCSF students to drive, and while they then were approving the Exclusive Negotiating Agreement, they would expect the problem caused by the loss of parking due to the development to be solved when they have to consider approving a Purchase Agreement with the developer.

At a meeting of the Supervisors on March 15, 2018, Supervisor Norman Yee, whose District includes this Project, stated that he recognizes that parking for students at CCSF is important. He recognized that many students need to drive and stated that "We cannot have a project here at all unless we solve the parking problem. The City has heard this loud and clear. If we do not have a solution to the parking problem we cannot move forward with this project."

But despite these commitments from the SFPUC and Supervisor Yee, there is no current solution.

3. Loss of Parking During Construction Not Addressed

The DSEIR states that during Phase 0 construction worker parking would be provided for construction workers in areas not under construction. But, public parking would not be available at all for “safety reasons and due to mass grading and construction activities.” [DSEIR 2-43]. The DSEIR talks about limited parking for construction workers during other stages of construction, but makes no mention of parking for CCSF students, faculty and staff. [DSEIR 2-43]. The DSEIR estimates there will be 800 construction workers on the West Basin, and makes no estimate as to the construction workers needed for the CCSF Facilities and PAEC on the East Lot. The DSEIR recognizes that CCSF may do its own construction on the East Lot but makes no analysis of the impact of that construction on parking for students, faculty and staff. [DSEIR 3.B-95; DSEIR 3.A-13]

The construction on Balboa Reservoir Development alone is scheduled to last for 6 years, with possible extensions “subject to changes due to market conditions and other unanticipated factors.” [DSEIR 3.C-29]. Yet, there is absolutely nothing addressing the parking needs of students, faculty and staff other than references that during certain time absolutely no one can park on the construction site. And, there is absolutely nothing about limitations to student parking during the PAEC construction on the East Lot.

4. Conclusion

As set forth in this memorandum, the realistic parking demand of City College greatly exceeds the 220 spaces referenced by the developer, who relies on the wrong Table in the Fehr & Peers TDM, fails to consider the construction of the PAEC, fails to consider the correct growth rate adopted by CCSF itself, and does not take into consideration that neither CCSF nor the Developer have made binding financial commitments to adopt any suggested TDM procedures. In addition, no plans have been made with respect to the almost total loss of parking for students, faculty and staff of CCSF during the almost 7 year construction period.