

BRCAC:

A few days ago I had sent you a Written Comment on Transportation that cited a UCB Haas School of Business "Westwook Terrace" study/ proposal.

The Written Comment quoted "Key Challenges" from that study proposal. I urge you to examine how the Reservoir Project has addressed those "Key Challenges" --in particular:

2. As the largest student parking area on-campus, preservation of parking capacity on the Balboa Reservoir is a focal point for both the City College and the local community.

3.

Due to limited access points and large influx of new residents, traffic impact and flow is a primary concern for the project.

The Reservoir Community Partners, LLC's (Avalon-Bridge) Base Plan shows motor vehicle access at two points: Lee Avenue (Whole Foods exit) and North Street (adjacent to Riordan High). This confirms the Haas Business School study's observation of "limited access points and large influx of new residents."

Yet the Reservoir Project's solution has been TDM and Residential Permit Parking which is totally deficient in addressing a "Key Challenge."

To refresh your memory, please consider and review the following (from an earlier submission regarding the Nelson-Nygaard TDM Framework) for your Transportation discussion:

The main significance of the TDM Framework is that it functions as a means for the Reservoir Project to avoid its responsibility to mitigate its adverse impacts:

**INHERENT INEQUITY IN THE BALBOA AREA TDM FRAMEWORK:
DUMPING THE BALBOA RESERVOIR PROJECT'S RESPONSIBILITY TO MITIGATE
ITS ADVERSE IMPACTS ONTO ITS VICTIMS**

CEQA principles call for new projects like the Balboa Reservoir Project to mitigate adverse impacts on the existing setting.

Being a public service, City College has CEQA standing as an "environmental factor" that would require the proposed Reservoir Project to mitigate its adverse impacts.

From the very beginning of the Reservoir Project's public engagement process, CCSF stakeholders have complained about the adverse impacts on student enrollment and attendance that would be generated by the Project's eviction of existing student parking.

GENESIS OF BALBOA AREA TDM FRAMEWORK STUDY

In order to assuage community concerns regarding parking and traffic, the Reservoir Project initiated the Balboa Area TDM Study.

People in the community were expecting the study to be an all-around and objective analysis of transportation issues. What people in the community did not realize was that the TDM Study's general conclusions had already been pre-ordained.

The Balboa Area TDM Study had been given its marching orders:

"The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents."

WILLFUL DISREGARD FOR HARD DATA

The City Agencies have managed the Reservoir Project in a manner similar to how the Iraq War had been promoted. Just like the Iraq War in which, according to British Intelligence's Downing Street Memo, "... *the intelligence and facts were being fixed around the policy*", the recommendations and conclusions of the Nelson-Nygaard study have been fixed around the pre-determined TDM policy.

The Balboa Area TDM Framework has been fixed..... with willful disregard for the hard data from surveys that would refute the pre-determined TDM dogma.

WILLFUL EXCLUSION OF COMPREHENSIVE PARKING ASSESSMENT

Sunshine Ordinance documents reveal the following:

In 2014, the AECOM Transportation Analyst had proposed performing a comprehensive supply & demand assessment for all on-street and off-street parking in the neighboring vicinities. Jeremy Shaw of the Planning Dept put a stop to AECOM's proposal to perform this comprehensive assessment.

Instead, in a 2014 email to the AECOM Transportation Analyst, Planning Dept told AECOM to confine their study to the Reservoir parking lots alone:

"... edits made in the attached word document reflect the current thinking in SF transportation analysis... Comment [JS4]: We'd recommend just looking at the [Balboa Reservoir parking lots--aj] parking lots. --- Off-site parking analysis is nice to have. But really we want to focus the effort on what will drive the on-site design and what kind of trips that design will generate – rather than worry about off-site impacts and mitigations..."

So from the very beginning, starting with the AECOM Existing Conditions' Transportation Analysis, a full and objective assessment and analysis had already been stopped in its tracks by the Reservoir Project Staff.

"THE CURRENT THINKING IN SF TRANSPORTATION ANALYSIS"

What was--and is--the "current thinking?" The thinking is: **Don't "worry about off-site impacts and mitigations."**

MANIPULATION AND BIAS IN CITY'S SURVEY OF CITY COLLEGE PARKING

The Reservoir Project's data collection was deliberately skewed to minimize apparent parking demand at City College. It did this by collecting PM data from 10 pm to 12:30 am when no classes are in session. From the Reservoir Project's Balboa Area TDM Existing Conditions Report: *"The surveys were conducted during two periods; midday, between 10:00 AM to 4:00 PM; and late evening, between 10:00 PM to 12:30 AM."*

Why would a parking survey be performed between 10pm and 12:30am when any fool could tell you that the CCSF parking lot would be empty?

DELIBERATELY OBSCURED: CONTEXT OF RESERVOIR BEING A NEW PROJECT

The TDM Study was a response to community concerns about transportation issues that would be generated by the new Reservoir Project that would impact the existing setting of City College and the surrounding neighborhoods.

The TDM Framework obscures this context by placing the new Reservoir Project on an equal footing with City College and the surrounding neighborhoods. The Balboa Area TDM Framework delineates three sub-areas: 1) City College Ocean Campus, 2) Balboa Reservoir , and 3) Balboa Area neighborhoods.

The TDM Framework fails to acknowledge the fact that the Balboa Reservoir sub-area, as a new proposed project, is responsible for mitigation of its adverse impacts. Instead, the TDM Framework presents the Reservoir Project as a fact-on-the-ground with importance equal to--if not greater than--City College and the neighborhoods.

THROWN OVERBOARD: STUDENT INTERESTS OF ACCESS TO EDUCATION

By putting the Reservoir Project on equal footing with City College and the neighborhoods, the Reservoir Project has been, with a sleight-of-hand, absolved of its CEQA responsibility to mitigate its adverse impacts on the existing setting.

Instead, mitigation has been dumped onto the Reservoir Project's victims. Instead of the Reservoir Project being held responsible for providing replacement parking for students, City College's FMP has had to respond by proposing new parking structures on SFCCD property.....but with no realistic funding sources for such structures necessitated by eviction of student parking.

INEQUITY IN BALBOA AREA TDM FRAMEWORK

Page 18 of the TDM Framework has a section entitled "Parking availability." The section brings up Balboa Park Station and City College as major trip generators. The section says that concerns have been expressed about parking during class times. **Yet this "Parking availability" section pointedly avoids any mention whatsoever of the impact of 2,200 new residents in a new residential project projected to contain about 550 parking spaces!**

On page 25, the TDM Framework has set up car-use reduction targets for the City College students and employees, and for the new Reservoir residents. It has also proposed Residential Permit Parking for the neighborhoods:

- The target for City College is **20%**.
- According to Figure 4 “Current and Recommended Mode Split, CCSF’s Ocean Campus”, the TDM Framework calls for student drivers to be cut back from 35% to 20% (a reduction of 43%).
- The TDM Framework calls for CCSF employee drivers to be cut back from 45% to 20% (a reduction of 56%).
- The TDM Framework sets an initial car use target for new Balboa Reservoir residents to be **60%**.
- In comparison, CCSF student car use is already down to **35%** and CCSF employee car use is already down to **45%**. Further cuts to 20% mean that **CCSF students and employees are being expected to sacrifice access to City College in order to benefit new Reservoir residents.**
- The TDM Framework has called for neighborhood residents to initiate Residential Permit Parking to mitigate spillover parking generated by students who will no longer be able to park in the Reservoir and to discourage new Reservoir residents to park in the surrounding neighborhoods.
- This is another shameless example of dumping mitigation responsibilities onto the victims of the Reservoir Project instead of the new Project taking responsibility for its own adverse impacts.

OVERARCHING GOALS

The TDM Framework sets up 4 overarching goals:

- i. Reduce vehicle-miles traveled
- ii. Reduce auto trips
- iii. Reduce traffic congestion
- iv. Reduce transportation costs to preserve housing affordability

FALSE EQUIVALENCE: REDUCING CAR USE vs. STUDENT ACCESS

Conspicuously missing from the list of overarching goals is: **ENSURING STUDENT ACCESS TO EDUCATION**. Other than providing Orwellian vacuous and perfunctory talk about *“the importance of accessible education and striv[ing] to establish equitable transportation choices...”* the TDM Framework proffers no realistic or effective solution to the priorities shown to be important to CCSF stakeholders in data collected in the CCSF Transportation Survey.

Hard data from the survey shows that “Reducing Travel Time” and “Arriving on Time” are overwhelmingly the most important considerations in choosing transportation mode.

CONFLATING MEANS WITH ENDS: THE OVERARCHING IMPORTANCE OF THE DESTINATION

A fundamental flaw of the TDM Framework is that it only treats the issue of reducing car usage in isolation.

It should not take a lot of smarts to realize that transportation is an issue only when there's a destination involved. Lacking a desired destination, transportation and parking are a non-issues.

The TDM Framework fails to recognize the fact that transportation is just a way to get to a desired destination. Instead, it dogmatically asserts that parking in and of itself generates traffic.

TDM FRAMEWORK: SPEAR-CARRIER AND PROPAGANDA FOR BALBOA RESERVOIR PROJECT

The Nelson-Nygaard TDM documents serve as spearhead documents to advocate for the interests of the Balboa Reservoir Project, NOT for the interests of City College stakeholders or for the neighborhoods.

The main significance of the TDM Framework is that it functions as a means for the Reservoir Project to avoid its responsibility to mitigate its adverse impacts.

--aj 7/7/2018