

## BALBOA RESERVOIR'S TDM NON SEQUITUR (2/13/2017)

The long-awaited TDM Study has been completed.

Nelson-Nygaard's "Balboa Area Transportation Demand Management (TDM) Plan: Existing Conditions" is available at [http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/Nelson Nygaard Balboa TDM-Existing Conditions Memo.pdf](http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/Nelson_Nygaard_Balboa_TDM-Existing_Conditions_Memo.pdf)

### IDENTIFYING TRANSPORTATION NEEDS FOR BALBOA PARK AREA

The Nelson-Nygaard TDM Report reports on existing conditions. Using a variety of resource materials and data, the Report, in the main, accurately describes the existing conditions.

This section of the Report correctly identifies "limited roadway space, transit infrastructure, and financial resources" as problems. Yet despite the obvious fact that the elimination of student parking and new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM.

**The TDM Plan/solution is not a logical outcome of an objective analysis of fact, evidence and common sense. The proposed TDM Plan is a pre-ordained, ideologically-driven solution. It is based on hope, wishful thinking and generalities; not on fact and evidence.**

The 4/13/2016 TDM presentation to the Reservoir CAC followed the "logic" of the non sequitur.

The TDM Report's shortcomings are significant. Here is an attempt to point out such shortcomings and their negative implications and consequences.

### LAND USE

The Report's very first paragraph in the "Land Use" section describes City College in one sentence: *"The CCSF Ocean Campus, zoned as public space, is located at the center of the study area and provides publically-accessible sports facilities."*

- **The Report's characterizes CCSF as only being a provider of "publicly-accessible sports facilities." This characterization undermines and ignores CCSF's primary importance as a critical provider of educational services to the broader Bay Area community.**

**It leads to minimizing the need for the Reservoir Project to mitigate its adverse impacts on CCSF enrollment and attendance.**

**The Report itself admits that the "information presented herein ...essentially "sets the stage" for what TDM strategies and supporting measures will be considered... "**

**MY CONCLUSION: The Land Use section of the Report sets the stage to downplay adverse impacts to CCSF's educational mission.**

## COMMUNITY ENGAGEMENT/SURVEYS

In the build-up to the Iraq War, the head of British Secret Intelligence Service (M16) recorded in the 'Downing Street Memo' how the war could be justified to the public: "... *the intelligence and facts were being fixed around the policy.*"

The Balboa Reservoir Project does something similar. To its credit, the Nelson-Nygaard Report presents legitimate surveys of the neighboring community. But the survey data is not used to objectively formulate conclusions regarding transportation and parking. Rather, the solution/policy had already been fixed. To its credit, the Report admits:

" the survey findings also assessed peak utilization rates. They indicated that, during the midday period, five off-street parking lots at CCSF Ocean Campus experience peak utilization that are above the average peak parking demand. For example, the survey findings indicated that Res. 1 and Lots A, H, S, U all experience peak parking occupancies between 98% and 100%. Therefore, on any given day, the majority of employee-only lots and the student lot (Res. 1) are completely full during the midday period. The weekday peak parking utilization for Res. 2 Lot was 9%."

**The policy of TDM had already been fixed, prior to, and regardless of the evidence contained in the surveys that were conducted subsequent to the TDM policy decision.**

## THE TDM NON SEQUITUR

The City Team, instead of formulating the Development Parameters based on evidence and data, had *a priori* concluded that TDM is the solution to adverse impacts that would be generated by new Reservoir residents and by the eviction of student parking.

TDM is a legitimate part of an overall Transportation Sustainability Program for the City as a whole. However, TDM as applied to the proposed Balboa Reservoir Project is not a suitable or realistic solution. TDM in the context of Balboa Reservoir will not be able to solve the problem of student access to education created by the Development Parameters. Nor will TDM measures be able to meaningfully solve transportation and parking problems generated by the Project.

Based on the survey results, TDM is a non sequitur:

## CCSF TRANSPORTATION SURVEY

The most telling question in the CCSF Transportation Survey was: **"When choosing how you typically travel to/from CCSF Ocean Campus, what are you most concerned about?"**

The question listed the valid concerns of cost, distance, travel time, arriving on time, and comfort/safety of trip for CCSF stakeholders.

· "Travel time" and "Arrival on time" were overwhelmingly most important concerns (90% and 73.2 % respectively)

Most of us want to be "green" and support the idea and practice of walking, biking and public transit. However the response to **"What would encourage you to use other transportation modes? (select all that apply)"** is grounded in the real-world needs of CCSF stakeholders.

Overwhelmingly, the most important consideration for respondents was “reducing travel time.” That efficient use of time is important should not be surprising to the City Team.

The CCSF Ocean Campus Transportation Survey results just confirm common sense. The survey confirms the common sense input that ordinary citizens have been trying to communicate to the Mayor’s Office and Planning Department to little effect—because the City Team’s “sustainable” Transportation Demand Management (TDM) “solution” had been pre-ordained in contradiction and opposition to the real world lives of CCSF and neighborhood stakeholders.

TDM is the City Team’s solution for transportation and parking problems that will be generated by the Balboa Reservoir Project. According to Planning Department’s Transportation Sustainability Program, “TDM is the “Shift” component of the Transportation Sustainability Program. A series of development focused TDM measures incentivize on-site amenities intended to provide sustainable alternatives to driving – or “shifting” people’s usual practice of driving alone in their cars – by providing residents, business tenants, and visitors with sustainable alternative travel options.”

However, instead of just applying TDM measures to the beneficiaries (“residents, business tenants, and visitors”) of the Balboa Reservoir Project, the City Team has shifted the brunt of the application of TDM to the pre-existing stakeholders of CCSF, Riordan, Sunnyside Elementary, St. Finn Barr, Lick Wilmerding, and the Ingleside, Westwood Park and Sunnyside neighborhoods.

No matter how the City Team tries to convince the public that its TDM Study will be comprehensive in nature, the fact remains that TDM is self-defined within its own parameters. The Reservoir Project’s TDM solution is straightforwardly documented: “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.”

One of the components of the City’s Transportation Sustainability Program is “Shift.” The idea is to shift car drivers onto other more sustainable modes of transportation. However, in the Balboa Reservoir context, “shift” has another more important meaning.

**The different and more important real-world meaning of “shift” is: shifting the burden of mitigation of CEQA-related adverse impacts onto school stakeholders and neighborhood residents. This is unacceptable.**

COMMUNITY SURVEY (Dept of Environment)

The section on the Community Survey conducted by the Dept of Environment highlighted two survey questions. The two questions pertained to the Existing Mode Split and to “Willingness to Try Different Modes of Transportation.”

The main concept of TDM is to get car drivers to walk, bike and take public transit. However the Nelson-Nygaard Report failed to show survey results for a critical question that would show the likelihood of respondents changing mode of travel. The Report does not show the survey results for Question #9-- **What is most important to you when you choose how you get to work?**

Although the Report fails to provide survey results for this question, I bet it would be similar to the results for the CCSF Survey: that ‘Travel Time’ would be one of the most important. I would also guess that ‘Reliability’ would also be close to the top. If my guess about responses to this question is right, how effective would the Balboa Reservoir Project’s TDM measures be able to resolve Travel Time and Reliability concerns?

- Since the data for Question 9 of the survey has not been presented in the Nelson-Nygaard Report, I will venture this unsubstantiated (but probably correct) conclusion:

**The TDM objective of shifting substantial numbers of car drivers onto public transit and biking will be unsuccessful because of the real-world importance of Travel Time, Reliability, and Convenience for people leading busy lives.....and who are not privileged to be members of the leisure class.**

--aj 1/3/2017