

RESPONSE TO COMMENTS

4. Responses to Comments

4.25 PARKING (PK)

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PK-1. *Effects on Area A*

Several commentors, including the NPS, request that the EIS address indirect impacts to parking in Area A and propose an effective mitigation program. The BCDC seeks an assurance that the same parking fees and/or time limits would be enforced in Area A and Area B to avoid additional traffic and parking impacts.

Response PK-1 – The PTMP is a programmatic land-use plan for Area B of the Presidio. Parking management is proposed as a standard feature of the

Trust's TDM Program for Area B of the Presidio, and would address, among other things, potential spill-over parking impacts in Area B caused by recreational use of Area A. Overall, the Trust's TDM program goal is to minimize the transportation impacts at the Presidio as a whole. However, the Trust recognizes that its TDM program may increase parking demand in Area A and in the EIS suggests implementation of coordinated parking management strategies as a mitigation measure for those potential impacts. It must be acknowledged that implementation of and the responsibility for this mitigation measure falls within the NPS jurisdiction, just as some mitigation measures associated with the Crissy Field Plan now fall within Trust jurisdiction. While the Trust cannot commit to this measure, which is outside of its area of responsibility, it will encourage the NPS to implement adequate parking strategies and will endeavor to ensure consistency of parking management within Areas A and B through continued cooperation and coordination. Active management of parking in Area A by the NPS could fully mitigate all impacts of parking demand from Area B.

PK-2. *Coordination of Special Events*

The CCSF Planning Department, SPUR, and a neighborhood organization request a discussion of how special events and other major activities at Fort Mason, the Marina Green and within the Presidio will be coordinated with the Golden Gate National Park Association and the City. The CCSF Planning Department also questions how parking for special events will be coordinated with the City.

Response PK-2 – The Trust Special Events Department Coordinator is an active member of San Francisco's Inter-departmental Staff Committee on Traffic and Transportation (ISCOTT), as are representatives of the NPS. ISCOTT is the San Francisco Municipal Government group that meets monthly to coordinate transportation-related impacts in San Francisco, including those due to large public events. This group coordinates impacts from events at the Presidio that affect San Francisco streets and San Francisco events that affect the Presidio. In addition, the Trust coordinates directly with the NPS and GGNPA through the weekly NPS Special Uses Group (SPUG) meetings. SPUG coordinates events for the NPS and GGNPA. The U.S. Park Police and NPS Park Rangers attend SPUG meetings.

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PK-3. Spillover Parking

Several commentors, including the CCSF Planning Department, the Sierra Club and the GGNPA, suggest that the Presidio Trust coordinate with the City and the NPS to successfully implement the proposed parking management program and avoid spillover parking to surrounding residential neighborhoods and Crissy Field. The CCSF Planning Department states that the “aim should above all be to reinforce the effectiveness of the TDM effort in reducing the volume of automobile traffic generated by the Presidio, not generation of revenue from parking fees or fines.”

Several commentors also suggest that the PTMP and EIS provide more detailed information about the Presidio’s proposed parking management program, including the role of the San Francisco Residential Parking Program (RPP) in avoiding adverse impacts to parking conditions in surrounding neighborhoods and the associated costs of avoiding these neighborhood impacts. The Exploratorium and one other commentor opposed the implementation of fee parking in the Presidio based on the belief that it would result in spillover parking in surrounding neighborhoods and Crissy Field.

Response PK-3 – The City’s RPP program, including enforcement of the parking regulations, provides the means for the City to protect neighborhoods surrounding the Presidio from parking demand impacts. This program has been established in all neighborhoods surrounding the Presidio except the area west of 17th Avenue in the Richmond District. The Trust expects very little excess parking demand in this area as there are few active uses planned in the southwest corner of the Presidio. Nonetheless, the Trust will work with the City and the neighbors in this area if they want to expand existing RPP districts to provide protections for uncovered areas.

The Trust views the coordination with the NPS and the City as two somewhat different issues. The coordination with the NPS involves ensuring that parking management is consistent across the entire Presidio. Coordination with the City will be focussed on minimizing off-site impacts of the Presidio’s program by ensuring that the City’s RPP program is effective in preventing parking impacts to the adjacent neighborhoods.

The primary goal of the parking management program is to shift Presidio-based trips to alternative transportation modes of transportation, so as to

reduce the impacts of automobile travel both within and adjacent to the park. Revenue generation is important from a cost-recovery standpoint and as a source of funds for providing transportation alternatives such as the internal shuttle bus service, but is not the driving factor behind parking management – which is, instead, a key component of an overall TDM program. Unlike the City, the Presidio Trust and the U.S. Park Police do not have the legal ability to retain revenue derived from parking fines.

PK-4. Park-Wide Parking Plan

A number of organizations request that the PTMP include a park-wide parking plan and specific policy guidance to inform the planning process. The Sierra Club asks that parking spaces be identified by location to understand choices for parking and to determine impacts.

Response PK-4 – The PTMP provides policy guidance to inform future implementation decisions, much like the City’s General Plan, with its Transportation Element, informs the City’s implementation decisions over time. Until further site-specific plans or proposals are developed, it would be speculative to identify specific parking locations or parking counts. Instead the Plan contains park-wide policies calling for parking fees to be implemented in order to limit parking demand at the Presidio, commits the Trust to implement additional parking supply reductions over time and requires consideration of average, rather than peak demand, considers opportunities for shared parking, and relocation of parking to small, less noticeable lots where possible.

All parking is local, and the suggestion that parking supply and demand warrant Presidio-wide assessment beyond the policies and analysis contained in the Plan and EIS ignores this fact. As future decisions are made regarding specific building uses and landscape improvements, accurate assessments of project-specific parking demand will be made consistent with policies provided in the Final Plan. As a result, the Trust expects an overall reduction in parking supply, effective (shared) use of parking resources, and accommodation of sufficient demand to allow constructive reuse of buildings and thus, generation of sufficient lease revenue to improve and operate the park. Prior to future site-specific analyses and decisions regarding building uses, a Presidio-wide parking plan is neither necessary or useful. See responses below and responses regarding Transportation Demand

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Management for more discussion regarding the Sierra Club's suggestions regarding parking demand and supply.

The assessment of project impacts related to parking (and other transportation issues) was undertaken using standard trip generation rates, traffic assignments, and other reasonable assumptions based on the land use alternatives considered. The analysis is not specific to the precise location of all parking, and impacts are not assessed at every single location in the Presidio. The analysis appropriately focuses on overall supply, demand, the potential for spill-over effects, and the inter-relationship between parking, auto use, and traffic congestion. Site-specific effects will be considered in the future as decisions are made regarding building uses and landscape improvements.

PK-5. Parking on Roadway Shoulders

The Sierra Club suggests that the Planning Principles prohibit parking on shoulders so as not to impede pedestrians and bikers and discourage overflow parking to avoid fees.

Response PK-5 – The Presidio Trust concurs with this suggestion and will continue to work toward elimination of parking on roadway shoulders.

PK-6. Assumption of Parking Fees in Parking Demand Estimates

The Sierra Club suggests that the parking demand estimates presented in the Draft EIS do not reflect the parking fees described as part of the Transportation Demand Management Plan in Appendix D of the Plan. The Sierra Club submits that the parking demand estimates reflected in the Draft EIS should reflect the alternative levels of parking fees.

Response PK-6 – Three alternative parking management strategies are analyzed in the EIS. The Minimum Management Alternative does not include any form of parking management. All existing parking spaces would remain in their current location, unregulated and without fees. The No Action Alternative (GMPA 2000) analyzes parking with the same TDM assumptions as analyzed in the 1994 GMPA. The GMPA envisioned limited utilization of parking management strategies and did not incorporate parking fees as part of the transportation analysis. As such, the No Action Alternative (GMPA 2000)

uses parking management to ensure that parking is available for Presidio-based uses by providing a limited supply of parking, but does not incorporate parking fees as a TDM measure. All other alternatives use parking fees as a key component of an overall TDM program to shift trips from automobiles to other modes of transportation.

The Trust used proposed land uses, CCSF trip generation rates, parking turnover rates, and a conservative estimate of TDM program effectiveness (including parking fees) to estimate future parking demand. These are standard and appropriate planning methods, representing the best professional judgement of Trust staff and consultants. They do not require identification of a specific dollar amount that would be charged for parking – only that parking fees would be introduced at a sufficient level to provide a disincentive for auto use. The analysis assumes park-wide TDM services including the internal shuttle, parking regulation and sufficient fees to shift 10 percent of all trips to alternative modes by the analysis year of 2020 or before.

The assumed 10 percent shift conforms to the Trust's minimum transportation standard, and not the long-term TDM goal included in the Final Plan in response to comments. It would be inappropriate to assume that the TDM program and/or parking fees will cause a greater shift for the transportation analysis of the EIS since it would mask potential traffic impacts of the plan.

PK-7. Excessive Parking Supply

The NPS requests the Trust to clarify whether providing excess parking is an adverse or beneficial effect.

Response PK-7 – Provision of “excess” parking is not proposed in any EIS alternative, and thus is not specifically assessed. In general, an overabundance of parking reduces the area devoted to landscaped areas and natural resources, and encourages driving. Conversely, providing insufficient parking can adversely affect park visitation and leasing initiatives, and increases illegal parking.

The objective of the Trust's Plan and the policies it contains is to strike a balance among competing interests. The Trust is committed to regulating and charging for parking in Area B of the Presidio in order to limit parking demand, to providing parking supply based on average parking demand in

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each area, rather than peak demand, and to additional parking supply reductions over time as part of site-and area-specific planning in the future.

PK-8. Parking Structures

Some commentors infer that all of the Draft EIS alternatives included either an underground parking garage or a parking structure, and request that the Final EIS address the impacts of such facilities. Some commentors are supportive of an underground parking garage at the Main Post Parade Ground. Other commentors disapprove of underground parking for various reasons, including requirements for above-ground structures for ventilation and garage access and costs. Commentors suggest considering underground or camouflaged parking in strategic locations at a later date when it can better be determined whether or not it is necessary.

Response PK-8 – No underground or above-ground parking structures are proposed in any of the EIS alternatives, with the exception of the 1,500-space underground garage previously analyzed and approved as part of the LDAC project. The impacts of this LDAC garage are assessed in the Letterman Complex EIS.

The PTMP retains the possibility of future studies for parking structures if deemed necessary to advance other benefits such as expansion of open space. The Trust recognizes that parking structures are a costly replacement to existing surface parking. The Trust also recognizes the potential benefits of parking structures as a way to concentrate parking at fewer locations, which may expand open space, and that underground parking could further expand open space and shield parking from view. No parking structures were assumed in any of the financial analysis of the alternatives. Parking revenue under the Final Plan Alternative, Final Plan Variant, and other build alternatives is assumed to support the transportation programs. The Trust acknowledges that underground parking garages, if considered in the future, would have needs for above-ground structures for ventilation. These and other issues would be explored during further analyses associated with any specific physical improvement proposal.

PK-9. Parking Demand Calculations

Several commentors, including the San Francisco County Transportation Authority, request the Trust to clarify how parking demand was determined.

Response PK-9 – Parking demand for the six land-use alternatives consists of both long-term demand (i.e., employee and resident parking) and short-term demand (i.e. visitor parking). Long-term parking for non-housing land uses was estimated by determining the number of employees for each land use and applying the average mode split and vehicle occupancy from the trip generation estimates for both external and internal trips. Each employee vehicle trip was assumed to require one space per day. The parking demand for lodging was estimated as long-term only, with a rate of one space per room, which accounts for both employees and guests. For all alternatives, a long-term rate of 2.5 spaces per dwelling unit was used for all existing housing that would be retained, and a rate of 1.5 spaces per unit was assumed for all newly constructed housing. The lower rate for newly constructed housing reflects the smaller size of proposed new housing units.

Short-term parking was estimated based on the total daily visitor trips and the average turnover rate. A short-term parking turnover rate of six vehicles per space per day was applied to most land uses for all alternatives, with the exception of retail and cultural/educational uses, for which a turnover rate of ten vehicles per space per day was used, as well as conference uses, for which a turnover rate of three vehicles per space per day was used. Detailed parking demand calculations by alternative are provided in the PTMP Background Transportation Report.

With the exception of the Minimum Management Alternative, the parking demand for each alternative was reduced due to parking management strategies to discourage single-occupant auto use. These parking management strategies include parking fees and regulating access to parking supply. See responses below for more discussion of parking demand and supply.

PK-10. Consideration of Housing in Parking Demand and Supply

The CCSF Planning Department and Cow Hollow Neighbors in Action infer that parking demand was only calculated for non-residential uses and request that the Final EIS determine total parking demand and supply for Presidio

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housing as well as other land uses in the PTMP alternatives. The CCSF Planning Department also questions the parking plans for the 23-acre LDAC, and whether or not demand for the LDAC was included in the cumulative estimates.

Response PK-10 – The parking demand and supply figures in the Draft Plan and EIS included those associated with existing and proposed housing. However, the demand shown in the Draft EIS represented midday weekday demand for all land uses. Although this is the time when average parking demand for the entire park is greatest, it is not the peak usage time for some land uses such as housing. As such, the demand figures have been presented differently in the Final EIS. The demand figures in the Final EIS show average demand for each planning area during the peak time for that particular area. For areas that are primarily residential, recreational, and cultural/educational, the peak demand time occurs on the weekend.

The 23-acre LDAC's parking demand and supply are included in the cumulative estimates. The estimated parking demand for the 23-acre LDAC in the Draft EIS was assumed to be that of typical Presidio office space. The parking demand estimates and supply now included in the Final EIS have been revised to be consistent with the demand and supply numbers presented in the Letterman Complex Final EIS in order to reflect the specific travel characteristics of the LDAC.

PK-11. Support of Further Reduction of Parking Supply

The San Francisco County Transportation Authority questions why more parking spaces were not converted to other uses such as open space, given that management of parking supply is one of the most effective means of managing vehicular traffic.

Response PK-11 – The parking supply figures presented in the EIS are based upon average parking demand during each planning area's peak demand period. The parking demand figures take into account a conservative trip reduction resulting from TDM programs including parking management. The proposed parking supply represents a reduction from the existing number of parking spaces, while accommodating the demand of the land uses proposed in the PTMP. The Trust is committed to further parking supply reductions as part of future site-specific or area-wide planning, assuming that the Trust's

TDM program, which includes transportation improvements, proves to be more effective than conservatively estimated in the transportation analysis.

The Trust concurs that constrained parking supply is an effective means of reducing vehicular traffic when used in conjunction with increased alternatives to the automobile. Charging for parking is another effective way to reduce vehicular traffic. Because an overly constrained parking supply can present adverse impacts on park visitation, leasing and adjacent neighborhoods, the Trust is proposing parking fees as the primary strategy in PTMP, supplemented by reductions in supply.

PK-12. Reduction of Parking Supply

Various commentors request the Trust to adopt strategies that would limit the supply of parking to roughly equal to or less than parking demand to meet both transit and parking goals. The Sierra Club asks that the parking supply be the same as under the GMPA and recommends that the Trust impose parking fees.

Response PK-12 – The proposed parking supply in all alternatives is based upon average parking demand during the peak demand period for each planning area. Parking demand calculations took into account a 10 percent reduction in vehicle trips associated with implementing the Trust's proposed TDM program, including parking fees. The effectiveness of the TDM Program assumed for the purposes of the EIS analysis is conservative. The Trust's TDM goals as set forth in the PTMP are more aggressive and are expected to reduce parking demand further, thereby reducing the parking supply that will be needed in the future. Under the Final Plan, the parking supply would be reduced in the future as specific building uses become known, as landscape plans are developed, and as the TDM program effectively reduces overall parking demand.

In response to comments about the calculation of parking demand, and commentors' suggestions to limit parking supply to be roughly equal to parking demand, the Trust has revised the analysis to better reflect average demand for parking based on the land use alternatives.

The Draft EIS presented the average parking demand for the entire Presidio during the midday weekday time period. Although the midday weekday

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period represents the cumulative average parking demand peak at the Presidio, it does not equate to the greatest average parking demand in all areas. Average demand for residential areas such as East Housing is greatest on weekends.

Revised parking demand calculations for each planning area estimated cumulative average parking demand by land use during the midday weekday, evening and weekend time periods. The analysis was then amended to show the average parking demand for each planning area during the time period when demand for parking would be greatest. For example, parking demand in residential areas was calculated when most residents are at home, and demand in employment areas was calculated when most employees are at work, then these numbers were totaled. Also, in the South Hills area, estimated parking demand was increased by 250 to reflect the outdoor recreation uses (hiking and golfing) that were not captured by the original demand calculations, which were based exclusively upon building square footages. In another adjustment, the parking demand calculations in the Final EIS assume a parking demand rate of 1.5 spaces per unit for all newly constructed housing and a rate of 2.5 per unit for all existing housing that will be retained. This adjustment reflects the size of current and planned new housing units. Finally, the parking demand and supply for the 60-acre Letterman Planning District were refined to reflect assumptions used in the Final EIS for the 23-acre LDAC. This constitutes amendment of the Draft EIS analysis, which assumed that the 23-acre site was largely comprised of general office space, and included parking demand calculations for general office space.

Parking supply presented in the Final EIS is 5 percent above the revised parking demand figures for all alternatives except the Minimum Management Alternative. The addition of 5 percent is intended to ensure that Presidio parking demand can be accommodated while not oversupplying the Presidio with unneeded parking. The revised parking supply in the Final EIS accounts for opportunities for shared use of parking spaces within a given planning area.

The 1994 GMPA proposed reducing parking in the Presidio from an estimated 13,032 spaces to 8,386 spaces, a reduction of about 4,646 spaces, or 36 percent. The associated analysis concluded that parking in neighborhoods around the Presidio would be unaffected by this change, and that the supply of parking would continue to “accommodate average daily parking demand under normal conditions, with only minor shortages during peak periods”

(GMPA EIS, pages 178-179). The proposed supply of 8,386 spaces falls within the range analyzed in the PTMP Final EIS, and thus its impacts and benefits are also captured by the EIS analysis. The Final Plan Alternative would include more building space than the 1994 GMPA, and would thus generate more parking demand, warranting a supply of about 9,165 spaces. Unlike the GMPA, the Final Plan proposes to use parking fees to regulate demand and would not rely solely constraining parking supply. This difference in approach provides additional rationale for the additional amount of parking (about 780 spaces proposed Presidio-wide.)

PK-13. Current Parking Utilization at the Letterman Complex

Cow Hollow Neighbors in Action request that the Final EIS recalculate current parking utilization at the 23-acre Letterman Complex.

Response PK-13 – Current parking supply and utilization considers the entire 60-acre Letterman Planning District, and not just the 23-acre future site of the LDAC, which is currently closed. The number of occupied parking spaces in the 60-acre Letterman Planning District presented in the EIS is based on data collected prior to the closure of the 23-acre LDAC for construction. Future parking supply also considers the entire 60-acre Letterman Planning District since demand from LDAC employees and visitors is included in demand calculations presented for all EIS alternatives. In addition, the parking demand estimates and supply now included in the Final EIS have been revised to be consistent with the demand and supply numbers presented in the Letterman Complex Final EIS in order to reflect the specific travel characteristics of the LDAC.

PK-14. Support of Market-Rate Parking Fees

The Sierra Club, U.S. Environmental Protection Agency, San Francisco Bay Conservation and Development Commission and various individuals request that the Presidio Trust commit to pricing parking fees to cover the cost of all TDM programs and to discourage the use of cars in favor of transit. The Sierra Club also suggests that the Presidio Trust implement market rate parking fees of \$7 per day or \$140 per month as for employees and visitors in FY2002. The GGNRA and Point Reyes National Seashore Citizens’ Advisory Commission suggest that parking revenue be based on parking fees

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at the upper end of free-market rates in order to discourage auto use, and supports implementing the fees as soon as possible.

Response PK-14 – The Trust is committed to implementing parking fees in the Presidio and to using the revenues generated to support transit and other improvements designed to reduce reliance on the private automobile. Residential parking management, including fees for every car beyond the first car per dwelling unit, will be implemented starting in summer 2002. Non-residential parking management, including fees to discourage long-term parking by park employees, will be implemented in phases, starting with the Main Post Planning area. One impediment to rapid implementation of non-residential parking has been concerns expressed by NPS regarding potential spill-over effects on Area A and overall effects on park visitorship. Further analysis and consultation regarding these issues will be undertaken shortly, with the hope that the first phase of non-residential parking management can be implemented by mid-2003.

It would be unrealistic to establish specific parking fees in a policy document like the PTMP, which is expected to guide implementation decisions over a 20 to 30 year period. Instead, parking fees will be reevaluated and adjusted over

time to maintain a rate that accomplishes the desired results without compromising the Trust's ability to generate reasonable rents from leased space.

PK-15. Impact of Parking Fees on Visitation

The Exploratorium asserts that parking fees will negatively affect visitation to destinations like Crissy Field, the Marina, and the Exploratorium.

Response PK-15 – The Presidio Trust acknowledges that fee parking may discourage some people from visiting these locations. However, there is a need to balance the desire for unrestricted access with the adverse environmental impacts resulting from unrestricted automobiles. Parking fees encourage people to use nonautomobile-dependent transportation modes, such as transit, biking, walking, or carpooling, to visit desired sites, thereby positively impacting the visitation experience for all, and will be pursued incrementally in non-residential areas, as described above. The focus will be on long-term parkers (employees and long-term visitors), and not short-term visitors.