

### 4.26 TRANSPORTATION DEMAND MANAGEMENT (TDM)

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#### **TDM-1. Inclusion of TDM Program in Transportation Analysis**

Several commentors, including the CCSF Planning Department, the Sierra Club and the San Francisco County Transportation Authority, request that the PTIP EIS not include the TDM program as a common feature of all alternatives. The Sierra Club contends that the EIS should analyze varying levels of TDM, automobile use, and parking demand across different alternatives and discuss the traffic impacts of at least two or more levels of goals showing the effect of a lower automobile mode share. The Sierra Club also presented tables showing varying TDM goals and the corresponding effect on parking demand to be addressed and critiqued by the Trust.

**Response TDM-1** – Three levels of Transportation Demand Management were analyzed in the EIS. The Minimum Management Alternative does not

include a TDM program, and does not include any parking fees or internal shuttle bus service, which are expected to be the two most effective TDM measures. The No Action Alternative (GMPA 2000) assumes that TDM programs would be provided by the park tenants as described in the GMPA. The analysis of this alternative included the provision of an internal shuttle bus service, but did not incorporate parking fees. As such, the No Action Alternative (GMPA 2000) TDM program is less comprehensive than those included as part of the remaining alternatives, all of which include the same set of park-wide TDM programs, including parking fees, an internal shuttle bus service, and other program elements designed to shift trips from automobiles to other forms of transportation.

By including three different assumptions regarding the TDM program, the EIS allows an assessment of the results or “impacts” of the program or its absence across the range of alternatives. The traffic impacts and parking demand described for the Minimum Management Alternative illustrate a worst-case scenario, with the maximum square footage and no TDM program. The traffic and parking associated with other alternatives illustrate more reasonable outcomes, with minimal or comprehensive TDM programs and a variety of square footages, resulting in a range of person trips, auto trips and parking demand.

The Trust used assumed land uses, CCSF trip generation rates, parking turnover rates, and a conservative estimate of TDM program effectiveness to calculate parking demand for those alternatives where applicable. These are standard and appropriate planning methods, resulting in a conservative estimate that the commitment to park-wide TDM services including the internal shuttle bus service, parking regulation and fees, and other program components will shift 10 percent of all automobile trips to alternative modes. This conservative assumption in transportation mode shift ensures that the potential traffic-related impacts and necessary mitigation measures are not underestimated and that potentially necessary mitigation measures are developed.

The Trust believes that the TDM program being proposed as part of most alternatives could cause a shift much greater than 10 percent. The Final Plan has been revised to describe minimum standards for auto use equivalent to the 10 percent shift, and to incorporate more aggressive long-term goals for the TDM program as transit services are expanded and as population and

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employment increases. This goal is generally more aggressive than some suggested by the Sierra Club in that 65 percent of internal trips would be by modes other than private auto.

The Sierra Club's proposal suggests that to achieve a higher transportation mode shift for external trips and external trips is a simple matter of constraining the parking supply, charging for parking, and achieving a higher number of person per vehicle (i.e., 3.3 or 2.0 persons per vehicle rather than 1.4 persons per vehicle as assumed). Methods for increasing the number of persons per vehicle are not clear other than the suggestion that parking revenues be used to subsidize additional transit services. Also, there is no clear relationship in the Sierra Club comments between the parking regulations suggested and the outcomes presented, although the suggestions regarding regulations are extreme, including one that would provide only one parking space for every 15 employees (the 1964 Planning Code limit for the downtown core of San Francisco is cited as the source). Overall, the Sierra Club comments seem to suggest that parking demand can be easily controlled so that in the end, 7,200 employees, 1,650 dwelling units, and park visitation would together result in a demand for close to 7,500 parking spaces park-wide, or 3,710 less than exist today. Aspects of the Sierra Club's proposals are discussed further in the response below, and a thorough critique is contained in a letter to the file prepared by Wilbur Smith Associates dated May 2002. This letter is available for review in the Presidio Trust library.

### **TDM-2. *Analyze Alternative with 50% and 30% Automobile Use by Employees***

The Sierra Club requests that the Final EIS analyze alternatives that include a goal of 50 percent and 30 percent automobile mode share for employees. The Sierra Club suggests achieving these goal through the use of parking fees, and by using the revenue from parking fees to subsidize Muni and regional transit providers.

**Response TDM-2** – In response to public comments, the Final Plan has been amended to include an aggressive long-term goal of reducing auto use well below amounts articulated in the Draft Plan. In addition, the Final Plan makes clear that the goals included in the Draft Plan are merely the minimum standards that must be met. The standards/goals are as follows:

	<u>Internal Trips</u>	<u>External Trips</u>
Minimum Standards:	50% by auto	70% by auto
Long-Term Goal:	35% by auto	50% by auto

While the minimum standards are, in the professional judgment of Trust staff and consultants, achievable in the near term, the long-term goals will require substantial investments (by the Trust and others) in transit service, and will only be achievable when population and employment at the Presidio reach historic levels. While no goal is articulated exclusively for worker trips, the Sierra Club's suggestion for more aggressive goals has been incorporated into the Final Plan. Reaching a specific goal of 30 percent auto use appears unrealistic in our professional opinion given the low density of housing and employment proposed, and the distance between the Presidio and other residential neighborhoods and employment centers in the region.

### **TDM-3. *Analyze Alternative with One Space per 15 Employees***

The Sierra Club requests that the Final EIS analyze a new alternative that assumes one parking space for every 15 employees to reflect the same conditions as provided in the 1964 Planning Code for office space in downtown San Francisco.

**Response TDM-3** – The suggestion that parking supplies at the Presidio be constrained so as to provide one parking space for every 15 employees, similar to a 1964 standard for downtown San Francisco, is unrealistic. The Presidio is not as dense or as accessible as downtown, and one of the few competitive advantages it offers for leasing space is the availability of parking.

As clearly articulated in the Trust's Plan, the overall supply of parking will be reduced over time, and parking will be regulated, with fees assessed to long-term parkers. Nonetheless, the Trust must be careful not to constrain the supply or regulate it to the extent that its core mission – preservation of the park's historic buildings and its other resources for public use – is threatened. In other words, the supply cannot be constrained so much that leasing space becomes impossible, or that competition for parking negatively affects the number of visitors who come to the park or their experience once here.

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### **TDM-4. TDM Coordination with Area A**

The Sierra Club suggests that the Draft EIS transportation and parking analysis is based on TDM assumptions that cannot be substantiated without commitment from the NPS to implement TDM strategies in Area A. The GGNRA Citizens' Advisory Commission, Sierra Club and another commentor suggest that the Trust and NPS coordinate their respective TDM programs (including parking management strategies), as TDM policies in Area A will affect Area B and vice versa. The Sierra Club specifically addresses parking management, and submits that the commitment not to provide any parking in Area A for Area B employees is essential to any TDM Plan and that parking limitations and pricing are the management controls to keep driving at sustainable levels in Areas A and B.

**Response TDM-4** – The Final Plan articulates trip reduction standards and goals that apply whether Area B employees park in Area A or Area B, as both of these types of trips will be counted as “driving to work.” In addition, there is only a small amount of parking in Area A that could be used by workers in Area B. East Beach and West Bluff parking areas encompass a total of 560 total parking spaces that could potentially be used by employees from Area B if efforts to coordinate parking management across jurisdictional boundaries are not successful. The EIS analysis appropriately assumes that TDM measures are effective in resulting in a 10 percent shift from auto use. This assumption is dependent on parking management in Area B, and assumes coordinated management in Area A, but is not dependent on parking management in Area A. As stated above, the parking supply in Area A is limited. It is also distant from most employment areas and thus, spill-over parking could only minimally affect the number of people who choose to drive instead of using other modes of transportation.

The Trust expects that benefits of many of the park-wide TDM services provided by the Trust such as the shuttle, car sharing, transit service coordination, and on-site transit ticket sales, will accrue to tenants in Area A of the Presidio as well as to tenants in Area B.

The Trust regularly meets with the NPS to coordinate these and other transportation strategies, and has also been working with the NPS to address issues of implementing some form of parking management in Area A of the Presidio. Nonetheless, as the PTMP is a land use plan for Area B of the

Presidio, it would be inappropriate to assume that programs described in the Plan could be universally applied to the entire Presidio.

### **TDM-5. Support for More Aggressive TDM Goals**

Several commentors, including the NPS and the GGNRA Citizens' Advisory Commission, suggest that the PTIP EIS should be more aggressive in its TDM program trip reduction goals. The GGNRA Citizens' Advisory Commission states “The Trust must establish a national model for environmentally sound methods of moving people not cars.” The NPS states “in its present form, the program would attract cars at roughly twice the rate as the rest of San Francisco. The NPS recommends that the elements of the TDM Program be more ambitious.”

**Response TDM-5** – In general, the Trust agrees with the commentors that the Draft Plan “goals” were intentionally set at a level that the Trust believes can be met or exceeded with the TDM program suggested. These goals were then assumed in calculating the potential impact of future vehicular traffic in the park and surrounding areas. The Final Plan has been revised to define what were previously described as goals as minimum performance standards, and to introduce more aggressive long-term goals for automobile trip reductions as transit service is expanded. As proposed, the Trust's TDM program is a national model for TDM programs with required participation and trip reduction performance standards for all tenants, and park-wide services provided by the Trust to support these efforts. In its current form, the Trust's program has already received recognition from the EPA and the U.S. Department of Transportation for joining the Commuter Choice Leadership Initiative, a voluntary public-private partnership that promotes employee-provided commuter benefits. The national program was developed to improve traffic flow and air quality by encouraging U.S. companies to offer employees alternatives to driving to work alone. By participating in the Initiative, the Trust has earned the designation “Commuter Choice Employer,” a mark of excellence for environmentally and employee friendly companies.

The rate at which the Presidio attracts cars is directly associated with its layout, density and location. These factors will forever limit the amount of transit service available without massive subsidies by transit agencies or the Trust. The Trust believes that the most effective way to change automobile-oriented behavior is through parking fees for all users of Presidio parking.

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The revenue from parking will be used to provide transportation alternatives to those people who can/will use non-automobile modes. Commentors can be assured that the Trust intends to continue to reevaluate and upgrade the TDM program over time, as described in Appendix D to the Final Plan and Mitigation Measure TR-22.

### **TDM-6. *Additional TDM Measures to Reduce Automobile Use***

Several commentors, including the Sierra Club and the CCSF Planning Department, request that the EIS consider additional TDM measures to keep automobile use to an absolute minimum. The NPS suggests 1) focus on the morning weekday peak period and weekend, midday auto traffic reduction because during these periods roadways are already at capacity; 2) develop a transit system that is attractive to potential riders, including connections to Transbay terminal, downtown BART, Golden Gate transit, and the GGB Toll Plaza; 3) maintain direct responsibility for providing good transit rather than passing this responsibility along to tenants.

The CCSF Planning Department states “There are many feasible mitigation measures that have not been considered in the EIS. These include participation in the City’s CarShare program, employer participation in the Commuter Check program, free transit passes for employees, and maximizing the number of Presidio employees who live at the Presidio. Will priority be given to Presidio workers for housing? Will the Trust control the parking lots and garages used by Presidio tenants, including the proposed underground garage at the Letterman Complex?”

Other commentors express concern about the level of automobile traffic in and around the Presidio, and urge the Trust to limit the impact of vehicular traffic by such measures as clustering parking and making recreational users walk, bicycle or ride a shuttle to destinations; not opening any more gates to cars; and participating in the City’s CarShare Program.

**Response TDM-6** – Refer to the Final Plan (Appendix D) or the Environmental Consequences section of the EIS which outline most of the above-mentioned TDM measures as part of many of the Plan alternatives being considered. The Trust is also open to suggestions of additional, cost-effective TDM measures that could be implemented, and is currently

exploring a relationship with City CarShare to bring their program to the Presidio using both conventionally fueled and electric vehicles.

Tenant-provided commuter check programs that pay for transit tickets for employees is included as a component of the TDM program required of many tenants, and the Trust has already implemented a commuter check program for Trust employees. Commuter check is a widely used program supporting transit use with pre-tax dollars, and presents an appropriate alternative to offering free transit passes to employees. Other components of the Trust’s TDM program include housing preferences for employees and parking regulations. Ultimately, all parking at the Presidio will be subject to regulations and fees established by the Trust. Management of parking may be by outside contractors, and will not include the Letterman Digital Arts Center garage.

Unlike the TDM program outlined in the GMPA, the Trust TDM program only delegates TDM activities to its tenants when they are best handled by the tenants. Activities such as Guaranteed Ride Home, which are best provided as park-wide services, will remain the responsibility of the Trust. No matter who bears the cost, enhancing transit service to, from, and within the Presidio is an expensive endeavor. The Trust already funds the internal shuttle at a cost of almost \$750,000 annually. Future service enhancements will depend on the availability of funding from parking and lease revenues, on the contributions of park tenants, and on regional transit providers. For example, an employee shuttle to BART is one of the activities mentioned in the TDM program as being a potential joint effort between tenants and the Trust to supplement Muni service.

While the Trust will be studying the reopening of the 14<sup>th</sup> Avenue Gate for automobile access (see Response TR-15), the Trust will design new gates at Greenwich Street and Chestnut Street strictly for pedestrian and/or bicycle access.

### **TDM-7. *Transportation Analysis With and Without TDM Program***

The San Francisco County Transportation Authority requests that the Trust clarify why implementation of the Presidio-wide parking management program and the TDM program should be considered mitigation if they are assumed to be included in most alternatives throughout the analysis. The

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CCSF Planning Department suggests that the EIS should analyze potential traffic impacts with and without the TDM program. The CCSF Planning Department states “The traffic analysis includes the assumptions of TDM program goals for all alternatives except the Minimum Management Alternative. This assumption means that the amount of traffic shown on the roads analyzed is reduced for five alternatives and that traffic has shifted to other travel modes, such as transit. Until the effectiveness of the TDM program has been demonstrated, using this assumption for traffic analysis leads to unsubstantiated and potentially unrealistic results. The trip-reducing impacts of the TDM program should be quantified and documented. Potential transportation impacts should be analyzed without the assumption of an effective TDM program. The TDM Program mitigation measure is both a mitigation measure and assumed to be part of the project description and assumed in the traffic analysis. Since the program consists mainly of strategies and lacks concrete detail for implementation, the Draft EIS should analyze potential impacts with and without such mitigation.”

**Response TDM-7** – As noted by the Sierra Club, the 1994 GMPA introduces its transportation strategy with the statement that “the Presidio will become a model of environmental protection and a showcase for sustainable design” (GMPA, page 42). The PTMP embraces similar goals in the discussion of transportation issues in Chapter Two. In light of these statements, it is appropriate to consider a TDM program as part of the project being analyzed.

In its EIS analysis, the Trust used a very conservative 10 percent shift in automobile trips as a result of the commitment to implement an extensive TDM program including parking fees, internal shuttle services, and other activities required to meet the minimum transportation performance standards. Based on past results and experiences in other cases, the 10 percent shift in vehicle trips to other modes is a reasonable assumption. U.S. studies have demonstrated that paid parking alone can reduce drive-alone commuting between 17 percent and 44 percent (average 25 percent) and the number of cars driven to work by between 14 percent and 28 percent (average 19

percent).<sup>1</sup> The PTMP analysis methodology is consistent with the GMPA transportation analysis, which shifted vehicle trips to transit due to the proposed TDM program, and is also consistent with the analysis of similar projects undertaken by the City, such as the Hunters Point Shipyard Redevelopment Plan.

To clarify what is included in the project being analyzed, and what is proposed as mitigation, the Final Plan and EIS have been revised to include as minimum performance standards what were previously described as goals, and to introduce a more aggressive long-term goal for automobile trip reductions as transit service is expanded. Mitigation Measure 19, TDM Program has also been revised to clarify that the Trust will monitor effectiveness of the program proposed as part of the project, and implement additional TDM activities or intensify existing TDM strategies if vehicle trips exceed expectations.

### **TDM-8. Effect of TDM Program on Park Visitation**

The Exploratorium suggests that the Trust not develop TDM and parking management programs that would discourage park visitation, and claims that out-of-town visitors would not elect to use public transportation. The Exploratorium specifically states “There is a basic contradiction between the stated goals of the Trust regarding visitor traffic to this National Park and the TDM and Parking Management Programs.”

**Response TDM-8** – TDM and parking management programs are not intended to discourage park visitation, but to encourage appropriate transportation modes to access the Presidio. Parking fees demonstrate that providing parking has a cost and that this cost should be borne by those who drive and park at the Presidio. It is inappropriate to hide this fee in the price of admission charged to all users despite the way in which they access the site. Many out-

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<sup>1</sup> “Cashing Out Employer-Paid Parking: An Opportunity to Reduce Minimum Parking Requirements,” Donald Shoup, 1995. “A Guidance Manual for Implementing Effective Employer-Based Travel Demand Management Programs,” Comsis Corporation and the Institute of Transportation Engineers, 1993.

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of-town visitors recognize the difficulties of driving in San Francisco and therefore use public transit to access the Presidio and similar destinations.

### **TDM-9. *Adjust TDM Program***

The Neighborhood Association for Presidio Planning and the GGNRA Citizens' Advisory Commission urge the Trust to adjust the TDM program to limit the number of internal trips, increase vehicle occupancy and decrease parking needs.

**Response TDM-9** – The Trust TDM standards for internal trips sets a maximum of 50 percent automobile trips and assumes 1.4 persons per vehicle. This translates into 35.7 vehicle trips for every 100 internal person trips by automobile. Housing preferences, internal shuttle bus service, improved bicycle/pedestrian network, and implementation of parking fees are expected to produce these results or better. While the Trust feels that it is unreasonable to expect a higher vehicle occupancy for internal trips, the minimum standard can be met in a variety of ways as long as the number of vehicles per 100 person trips is not exceeded. For example, lower automobile occupancy would be allowed by an increase in the usage of non-automobile modes such as transit, biking and walking. It is unclear how the commentors would achieve desired results different than these or impose restrictions or vehicle occupancy.

### **TDM-10. *Limiting Automobile Use for Tenants***

The Neighborhood Association for Presidio Planning, the GGNRA Citizens' Advisory Commission, and another commentor urge the Trust to require adherence to strict restrictions in vehicular use as a condition of occupancy in the Presidio.

**Response TDM-10** – TDM program participation and agreement to attain or improve upon the minimum transportation performance standard is a requirement of all non-residential leases. The Trust must balance the TDM requirements imposed on tenants with the need to generate revenue from leasing buildings and recognizes that for most tenants, trip reduction is not part of their core business. As a result, the Trust will continue to take a proactive role by providing park-wide services such as the internal shuttle that encourage non-automobile use, and will monitor tenants' TDM program

results. Parking management, including parking fees, will moderate tenants' parking demand.

### **TDM-11. *TDM Program Effectiveness***

One commentor submits that the Trust should not rely upon the TDM program to mitigate traffic impacts without having substantiated the effectiveness of the TDM program. Several commentors, including the CCSF Planning Department, the Sierra Club and the Golden Gate Bridge Highway and Transportation District, request that the Trust substantiate the effectiveness of the TDM program and describe how it will be enforced and monitored. The CCSF Planning Department specifically states “The Trust as landlord has the ability to ensure tenant compliance with the goals of both the TDM and Parking Management programs. The program lack incentives to ensure their success, and lacks incentives to shift people from single occupancy vehicles to transit. How will the programs be managed to quantify their success and make adjustments if goals are not reached? What will the financial contribution of the Trust to enhance MUNI service and other improvements outside the Presidio boundaries? The approach needs to be multi-modal, and to establish performance standards to evaluate its effectiveness over time, particularly as major employers come on line...How will enforcement of TDM Program measures be monitored?”

**Response TDM-11** – As stated in Mitigation Measure TR-22 and Appendix D of the Final Plan, effectiveness of the TDM program will be monitored through periodic surveys. Minimum performance standards are enforceable through tenant leases. The effectiveness of TDM programs that include charging for parking have been substantiated in many previous transportation case studies. In addition, the Trust is in the unique position of requiring tenant participation in TDM programs and attainment of trip reduction standards. The Trust will conduct periodic employee transportation surveys as part of their monitoring of park-wide TDM services. These surveys will measure individual tenants' success in meeting the TDM program trip reduction goals. The Trust also has the ability to conduct parking lot counts should the survey prove ineffective in measuring tenants' automobile mode split. Tenants that are not meeting TDM goals will be required through their leases to implement additional TDM measures until the goals are met. The Trust's TDM

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Coordinator (an existing position) is charged with implementing the Trust's TDM program, including park-wide TDM services and monitoring.

The Trust already makes a financial contribution to Muni to operate additional downtown express commute service to and from the park. The Trust will continue to work with Muni to ensure appropriate levels of transit service to the Presidio. The Trust also operates a free shuttle bus service within the park that connects to Muni. This service enhances existing local and regional transit service and serves as both an extension and feeder service to Muni and Golden Gate Transit. These services will continue, and will be supplemented as resources become available.

### **TDM-12. Comprehensive Regional TDM Program**

The CCSF Planning Department and one individual suggest that the Trust link its TDM program to the City's and region's efforts to develop an effective, regional, multi-modal transportation system. The CCSF Planning Department suggests "TDM requires continual coordination with the City and County of SF, including transportation planners from the Planning Department as well as MUNI and the Department of Parking and Traffic. Currently, transportation facilities are at or exceeding capacity. The only way to increase capacity is to use higher capacity modes of transport. It is important that the Presidio transportation program be integrally linked to the City's and region's efforts to develop an effective, regional, multi-modal transportation system."

**Response TDM-12** – The Trust agrees that its programs would benefit from coordination with the City and regional transportation agencies. The Trust

requires all tenants to register with Rides for Bay Area Commuters, the regional TDM services broker. The Trust also works closely with Muni, the Golden Gate Bridge Highway and Transportation District, San Francisco Department of Parking and Traffic, San Francisco Department of Public Works, San Francisco County Transportation Authority, San Francisco Clean Cities Coalition, City CarShare and others who coordinate transportation services and the region's efforts to develop an effective, regional, multi-modal transportation system.

Although roadway capacity is a constraint in some cases, many of the trips on transportation facilities serving the Presidio occur in the reverse commute direction, leaving sufficient capacity for Presidio-based trips. This condition does not modify the Trust's commitment to TDM as a strategy for reducing reliance on private automobiles.

### **TDM-13. Inclusion of Letterman Digital Arts Center in TDM Program**

The CCSF Planning Department asks that the Trust clarify whether the TDM program includes the Letterman Digital Arts Center project.

**Response TDM-13** – The preparation and approval of the Letterman Complex Final EIS was the first occasion for the Trust to detail the park-wide TDM program. The LDAC project has a separate Final EIS that details the TDM requirements for that particular development. These requirements mirror the program presented in the Final Plan, including the required trip reduction standard. However, the LDAC parking lot will not be under the Trust's control for implementing parking management programs.