The purpose of this memorandum is to respond to comments on the City College of San Francisco Mission Campus – Addendum to the Final Environmental Impact Report (Addendum). A comment letter was received on February 27, 2004 from Mr. Philip Lesser, President of the Mission Merchants Association, regarding the parking supply and demand at the proposed new CCSF Mission Campus. Two primary issues were raised in the letter:

- Parking Supply: According to the comment letter, approximately 75 makeshift parking spaces already exist on the project site, but these parking spaces will be eliminated with construction of the project. Although the project would add 50 off-street parking spaces within a new parking garage, there will be a net loss of 25 parking spaces at the project site.

- Parking Demand: According to the comment letter, based on the San Francisco Planning Department’s Transportation Impact Analysis Guidelines for Environmental Review (Guidelines), there would be a demand for 621 parking spaces with the project, not 156 parking spaces as stated in the Addendum.

Parking Supply
Currently, there are three off-street parking lots at the project site, two lots signed for City College of San Francisco (CCSF) faculty/staff only (12 and 14 spaces each), and one lot signed for San Francisco Unified School District (SFUSD) faculty/staff only (16 spaces). During field observations conducted during the evening (around 7:00 PM on a weekday), the two CCSF lots were mostly full, with 21 parked vehicles. However, it is likely that these two lots are fully occupied during other times.

The parking analysis conducted for the Addendum was limited to public parking, including on-street parking and publicly-available off-street parking facilities (primarily the 380-space garage on 21st Street between Bartlett and Valencia Streets). Within the study area, there are currently about 2,325 on-street parking spaces and 400 off-street parking spaces (see Page III.D-9 of the Addendum). Note that since the two CCSF lots on the project site are not available to the general
public, they were not included in the analysis. Based on field counts conducted during the weekday evening period, it was determined that the on-street parking in the study area is currently about 96 percent occupied and the off-street parking in the study area is currently about 68 percent occupied.

Although the project would eliminate the 26 parking spaces for CCSF faculty/staff and the 16 parking spaces for SFUSD faculty/staff that are currently on the project site, a new parking garage with 50 parking spaces would be provided as part of the project. As such, the project would not result in a net loss of parking supply in the study area, and the parking demand displaced would be able to find parking within the project parking garage, or at other parking in the vicinity of the project site.

Travel Demand and Parking Demand
Pages III.D-12 to III.D-16 of the Addendum present the methodology and approach used to determine the travel demand and parking demand for the project.

The travel demand associated with the project was based on the number of new students and faculty that were anticipated to be at the project site. Overall, the project would add two new classrooms and ten new language/computer labs, which would result in an additional capacity of 800 students for evening classes and 12 new faculty members. Since the existing Mission Campus students and faculty/staff are already at the project site or in the study area, they would be accounted for in the existing counts and therefore would be included as part of the existing traffic and parking conditions.

The trips associated with the new students were assigned to the various travel modes (auto, transit, walk and other) based on recent travel surveys conducted by CCSF of students at the Mission Campus, and were distributed to the various parts of San Francisco and the region based on residential zip code information provided by CCSF for current students at the Mission Campus. The trips associated with the new faculty were assigned to auto mode only (no survey information was available from CCSF), and were distributed to the various parts of San Francisco and the region based on residential zip code information provided by CCSF for current faculty at the Mission Campus. The parking demand for the new students and faculty at the project was based on the number of new vehicle trips (including an average vehicle occupancy of 1.4 persons, based on the CCSF surveys) and an average parking turnover rate.

The approach used to develop the travel demand and parking demand for the project was considered conservative since it assumed that all students and faculty would arrive and depart the project during the weekday PM peak hour, and would all be parked at the same time during the evening period. However, CCSF typically has multiple classes in the evening; therefore, the travel demand and parking demand associated with the new students and faculty would not be concentrated during one hour, but would instead be distributed throughout the evening.
Overall, it was estimated that the project would generate about 310 new vehicle trips during the weekday PM peak hour, and would have a maximum parking demand for about 156 spaces during the weekday evening period.

In general, the assumptions made by Mr. Lesser to develop parking demand for the project are somewhat incorrect. First, the project only includes the new classrooms and lab space, and does not include the existing Mission Campus facilities (see points 1 and 2 in the comment letter). As such, the use of the eventual total daily student enrollment and faculty/staff totals overestimate the effect of the project by double-counting the existing students and faculty/staff. Second, the Guidelines presents the mode split and trip distribution for the area where the project is located, not the location of residents of potential users (point 3). Third, the activity of students would generally be considered visitor trips not work trips (point 4), and visitor trips to Superdistrict 3 have an average of 2.26 persons per auto, which is substantially higher than the 1.23 persons per auto for work trips (point 5). Fourth, CCSF does not have five waves of trips throughout the day, but instead has distinct periods of activity before and after classes (point 6). An assumption of a number of waves of activity would not directly address the characteristics of evening classes.

In addition, the travel survey and residential zip code information provided by CCSF allow for a more accurate representation of the mode split and distribution characteristics than can be obtained from the Guidelines for both students and faculty/staff. As shown by this information, only about 25 percent of the current Mission Campus students drive, as compared to the estimate of about 60 percent from the Guidelines. Primarily, this is due to the anticipated locations of the students. According to residential zip code information of students provided by CCSF, over 50 percent of the current Mission Campus students live within the zip code that contains the Mission Campus and the seven adjacent zip codes. As such, it is appropriate than a higher percentage of students travel to and from the project site via transit, walking and bicycles, as compared to the information contained in the Guidelines.

Based on these incorrect assumptions and use of general information instead of detailed data from CCSF, a parking demand of 621 spaces for the project is a substantial overestimation of the likely activity at the new Mission Campus. The methodology and approach used to develop the parking demand for the new students and faculty at the project, as documented in the Addendum, is more realistic estimate of the new activity associated with the new Mission Campus, and would be consistent with the current parking conditions in the area.