

RESPONSE TO COMMENTS

Date: January 30, 2019

Project #: 20641

To: Don Bragg, Lisa Congdon, and Jing Ng – Prado Group

From: Amanda Leahy, AICP and Tim Erney, AICP/PTP – Kittelson & Associates, Inc.

Project: 3333 California Street

Subject: AB 900 Transportation Assessment – Response to OPR Comments

This memorandum summarizes the responses to comments received in January 2019 from the Governor’s Office of Planning and Research on the *Application for Environmental Leadership Development Project for 3333 California Street Mixed Use Project*, including *Attachment C, 3333 California Street Transportation Efficiency*. The comments are summarized below and included as an attachment to this response.

Summary of Comments and Responses

1. **Comment.** For analysis of transportation efficiency under AB 900, a project must compare its assessed trip generation to that of a “comparable project in a comparable location type”. The 3333 California Street application, however, describes a comparison between the proposed project and a project located in an average location nationally, rather than in a “comparable location type”.
 - a. **Response.** The comparable project has been revised to reflect a “comparable location type”. The comparable project analyzed in the updated application reflects a project developed in the same location as the proposed project and project variant and uses the standard *SF Guidelines* rates and methodology to estimate travel demand.
2. **Comment.** The trip assessment provided in the project application does not take credit for the trip reductions that would result from the proposed travel demand management (TDM) measures.
 - a. **Response.** The updated application estimates vehicle trip reductions associated with the proposed project/project variant TDM program.
3. **Comment.** In Appendix C of Attachment C, internal capture is assessed, but only for AM and PM peak trips. Assessment for qualification for an environmental leadership project should examine overall vehicle activity rather than focusing on peak hours only.

- a. **Response.** The daily and peak hour internal trip capture rate was calculated in the initial analysis. However, this information was not presented in Attachment C. The application and appendix material have been updated to present daily vehicle activity and internal trip capture calculations.
4. **Comment.** Project proponents should consider whether the baseline project used for comparison should contain some mixing of uses as well, perhaps similar to that of other projects in the neighborhood. The project assessment could then take credit for internal capture above and beyond internal capture in the baseline project.
 - a. **Response.** See response to comment #1. The comparable project analyzed in the updated application reflects a project developed in the same location as the proposed project and project variant and with the same land uses and quantities (i.e., square footage and number of units) and uses *SF Guidelines* rates and methodology to estimate travel demand. The *SF Guidelines* rates and mode share assumptions reflect the mix of uses prevalent in the neighborhood and trip reductions made for internal capture of trips are considered to be design-specific benefits and therefore would not be applicable to the comparable project. Therefore, a specific internal trip capture rate for the comparable project was not developed. The internal trip capture rate was developed for the proposed project and project variant to reflect the design elements specific to the proposed project and project variant that would lead to vehicle trip and vehicle miles traveled reductions.

Attachment:

Governor's Office of Planning and Research comments on *Application for Environmental Leadership Development Project for 3333 California Street Mixed Use Project*, including *Attachment C, 3333 California Street Transportation Efficiency*

OPR has reviewed the *Application for Environmental Leadership Development Project for 3333 California Street Mixed Use Project*, including *Attachment C, 3333 California Street Transportation Efficiency*. We provide comments and recommendations for next steps here.

Statutory requirement:

The project will achieve at least 15 percent greater transportation efficiency than comparable projects. The applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the project will achieve at least 15 percent greater transportation efficiency. For residential projects, the applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the purposes of this provision, comparable means a project of the same size, capacity and location type.

As described in the application, the project sponsor proposes to reduce trips associated with the project, compared to a comparable project, by:

- Developing the project in a fashion that mixes primary uses, leading to internal capture of some trips;
- Proposing a travel demand management program which will reduce trips (by an undetermined amount).

For analysis of transportation efficiency under AB 900, a project must compare its assessed trip generation to that of a “comparable project in a comparable location type”. The 3333 California Street application, however, describes a comparison between the proposed project and a project located in an average location nationally, rather than in a “comparable location type”:

“The comparable project is assumed to be a project with similar land uses as the proposed project but with vehicle trip generation that is more typical of national averages.” (Project Application, 3333 California Street, San Francisco Application for Environmental Leadership Development Project)

The project application compares trips generated by the project to ITE trip rates. ITE trip rates are explicitly designed to be applied in single use areas in nationally typical circumstances with respect to density, transit proximity and use, regional accessibility, etc. The proposed project would be built in a location type quite different from location types used to develop ITE trip rates, where trip-making and travel behavior generally are much different from national averages.

Meanwhile, the trip assessment provided in the project application does not take credit for the trip reductions that would result from the proposed travel demand management (TDM) measures:

“The measures in the project’s TDM Program would reduce vehicle trips generated by the proposed project or project variant; however, they have not been taken into account in calculating trip generation for the proposed project or project variant and therefore are not reflected in the comparison with the comparable project.” (*Project Application, 3333 California Street, San Francisco Application for Environmental Leadership Development Project*)

Also, in Appendix C of Attachment C, internal capture is assessed, but only for AM and PM peak trips. Assessment for qualification for an environmental leadership project should examine overall vehicle activity rather than focusing on peak hours only. In other words, it should assess total daily trips rather than peak hour trips.

Finally, as the baseline project is required to be “a project of the same size, capacity and location type.” As stated in that appendix, the project is located in a mixed-use neighborhood:

“The project site is located in the Laurel Heights/Jordan Park area of the Presidio Heights neighborhood in San Francisco, California. The neighborhood includes a variety of land uses, including commercial, retail, office, and residential uses.” (*Project Application, 3333 California Street, San Francisco Application for Environmental Leadership Development Project, Attachment C*)

Project proponents should consider whether the baseline project used for comparison should contain some mixing of uses as well, perhaps similar to that of other projects in the neighborhood. The project assessment could then take credit for internal capture above and beyond internal capture in the baseline project.