



SAN FRANCISCO PLANNING DEPARTMENT

Executive Summary Adoption of Amendments to the TDM Program Standards HEARING DATE: JANUARY 19, 2017

Case Number: 2012.0726PCA
Project Name: Amendments to the TDM Program Standards
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Recommendation: **Recommend Approval**

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The action before the Planning Commission is a resolution adopting amendments to the TDM Program Standards. While the Board of Supervisors has made several amendments to the associated TDM ordinance, none of those amendments were deemed to be material modifications requiring a referral back to the Planning Commission. If the Board of Supervisors proposes any material modifications to the TDM ordinance in the future, they will be referred back to the Planning Commission for consideration.

While this document provides brief background information, Attachment A includes a list of links to various resources to provide additional background information. These resources include previous TDM Planning Commission case reports, the current TDM Program Standards, the TDM calculation tool, and other resources.

BACKGROUND

Following a Planning Commission informational hearing on February 11, 2016 and an initiation hearing on April 28, 2016, the Planning Commission adopted two resolutions by unanimous 7-0 votes on August 4, 2016: 1) a resolution recommending that the Board of Supervisors adopt an ordinance amending the Planning Code to establish a citywide Transportation Demand Management (TDM) Program (TDM Ordinance) (Resolution No. 19715); and 2) a resolution adopting the Planning Commission Standards for the TDM Program (TDM Program Standards) conditioned upon approval of the TDM Program Planning Code amendments by the Board of Supervisors (Resolution No. 19716).

After the August 4, 2016 Planning Commission hearing, Supervisor Avalos (District 11) signed on as sponsor of the legislation. However, Supervisor Avalos completed his service of two successive four-year terms in January 2017, and is no longer the sponsor. Supervisor Cohen signed on as the sponsor of the legislation on January 9, 2017. The TDM Ordinance was heard at regularly scheduled Board of Supervisors Land Use and Transportation Committee hearings on November 28, 2016, and December 5, 2016, and several amendments were made. The Land Use and Transportation Committee continued the item to the January 23, 2017 meeting. Attachment B includes the current draft TDM Ordinance.

THE WAY IT IS NOW

The Planning Commission adopted the TDM Program Standards on August 4, 2016 conditioned upon approval of the TDM Program Planning Code amendments by the Board of Supervisors. The TDM Program Standards contain the specific requirements necessary for implementing the TDM Program. Although the TDM Program Planning Code amendments have not been adopted, staff has been using the TDM Program Standards when assessing a project's transportation effects in the surrounding

neighborhood and community for projects with approval before the Planning Commission. This has led to recent projects before the Planning Commission meeting most, if not all, of the TDM Program Standards requirements.

THE WAY IT WOULD BE

Since the Planning Commission’s action on August 4, 2016, staff has conducted additional outreach in preparation for the Board of Supervisors Land Use and Transportation Committee hearings. Based upon the additional outreach and analysis, staff has identified amendments to the TDM Program Standards that are proposed for adoption by the Planning Commission. These amendments to the TDM Program Standards are summarized below, and detailed in Exhibit A of the draft resolution. The draft resolution is Attachment C.

The following amendments are organized by “substantive” and “non-substantive” per Section 4.1 of the TDM Program Standards. **Substantive amendments require Planning Commission adoption**, while non-substantive amendments (e.g., clarifying text edits) may be made administratively.

Proposed Amendments to the TDM Program Standards

Substantive Amendments

1. Lowering the Minimum Target

Amendment. Table 2-1 would be amended to reduce the target by one to three points for development projects in land use category C (Residential) with between 0 and 15 parking spaces.

Discussion. Under current standards, the minimum required target is set at 13 points with no distinction between projects with 20 or fewer parking spaces. The proposed amendment would allow projects containing fewer than 16 spaces to have a required target as low as 10 points, as follows:

Number of Parking Spaces	Required Target
0 <= 5	10 Points
6 <= 10	11 Points
11 <= 15	12 Points
16 <= 20	13 Points

2. Remove Requirement to Reduce Parking for Projects with a Substantial Amount of Parking

Amendment. Section 2.2(b)(3) would be amended to remove the neighborhood that projects with a substantial amount of parking reduce their parking down to the neighborhood rate.

Discussion: The main goal of the TDM Program is to maintain mobility, that is, to keep people moving as our city grows. One of the additional benefits is to improve the development review process. One way this would occur is to provide flexibility to the project sponsor in developing a TDM Plan that best fits the needs of their project and neighborhood. A project sponsor would have flexibility in choosing from a variety of TDM measures from the TDM menu of options. However, this flexibility would not occur for the unique and rare circumstances surrounding projects with a substantial amount of parking, which may be associated with development with a substantial number of dwelling units or non-residential square footage. For these projects, the

TDM Program Standards, as currently written, require a project to exhaust all measures/points in the TDM menu to achieve the required target. If the required target is higher than the number of points available on the menu, then the project must reduce its parking to the neighborhood parking rate or down to an amount at which the target can be achieved, whichever is higher. This may tie the hands of decision-makers in unique situations where they may need to weigh other policy considerations for approving a project with this much parking. In these situations, the current TDM Program Standards require additional flexibility through the amendments described below.

If the TDM Ordinance were in effect over the past two fiscal years, 106 projects on the Planning Commission agenda would have been subject to the TDM Program.¹ Combined, the uses within these projects that would have been subject to the TDM Program represent approximately 225,000 square feet of retail (land use category A), 4.75 million square feet of office (land use category B), 7,100 dwelling units (land use category C), and 935,000 square feet of other uses (land use category D). For 97 percent of these projects (103 out of 106), a project sponsor would have had flexibility in choosing from a variety of TDM measures. However, for the remaining rare three cases, the project target would have been so high that a development could not accumulate enough points to meet that target.

As the TDM Program Standards are currently written, projects with very large amounts of parking would have to select all measures on the menu and reduce their parking to meet the neighborhood rate in order to be in compliance with the Program. Staff proposes that the TDM Program Standards be amended to retain flexibility for project sponsors and decision-makers in these rare circumstances. The Planning Commission will still have discretion to reduce a project's parking for other policy reasons, and projects with a substantial amount of parking may be found to have vehicle miles traveled impacts pursuant to the California Environmental Quality Act, which could require mitigation measures and/or the evaluation of project alternatives.

3. Create a Maximum Required Target for Projects

Amendment. Each individual project will have a maximum number of points it could achieve from the TDM menu. While the menu has 66 different options, some measures are reserved for certain land uses or geographies, and some may require additional City approval. Therefore, no project may take advantage of every option on the menu. Section 2.2(b)(3) would be amended so that no project's required target would exceed 80% of the points that project could otherwise achieve from the Menu of options. Based on the current Menu, this would result in a maximum required target of approximately 29 to 33 points for all projects. The phase-in and grandfathering Ordinance amendments described below would be in addition to these TDM Program Standards amendments.

Discussion: See No. 2 above.

¹ This covers the period between 7/1/2014 and 6/30/2016, and excludes projects that may have been required to comply with the TDM Ordinance if it had been in place, but would not have required Planning Commission approval (generally smaller projects). Therefore, this discussion underestimates the number of projects that would have been subject to the TDM Ordinance during this time.

4. Car-share Parking and Membership

Amendment. The amendments proposed to this TDM measure would enable projects to provide their own car-share vehicles and program for any car-share spaces offered in excess of those required by the Planning Code, would expand the option to provide 15% of car-share spaces to other shared motorized vehicle (like scooter, e-bikes), and correct typos present in the originally adopted standards.

Discussion: Some developers have provided feedback that they would like the flexibility to provide their own car-share cars-share program, instead of working with a Certified Car-share Organization. The car-share fleet would be required to operate like a car-share program—enabling advanced reservations by the hour or fraction thereof, payment by usage (time and/or mileage), availability to all eligible users, accessibility, located on-site, and insurance and maintenance is provided by the building (or building’s third party vendor). The TDM Ordinance does not intend to amend or override the current Code requirements related to provision of car-share parking, so any car-share parking required by Code would still need to be offered to a Certified Car-share Organization.

5. Family TDM Amenities

Amendment. The proposed amendments would clarify the requirements for on-site amenities, including the intensity and space of the amenities. One secure storage location and one secure large bicycle parking space shall be provided for every twenty dwelling units, with a minimum of two secure storage locations and two secure large bicycle parking spaces.

Discussion: Members of the development community had questions regarding the intent and specificity of the measure. This amendment would clarify those questions, while still providing flexibility in fulfilling the TDM measure.

6. On-site Childcare

Amendment. The proposed amendment to this TDM Measure would allow for Designated Child Care Units, as defined in Planning Code Section 401, to fulfill the requirements of this TDM measure.

Discussion: Members of the development community have requested that a measure be added to allow for shared in-home day care facilities. The Planning Code was amended in February 2016 to establish a residential child care impact fee. One or more Designated Child Care Units may be provided within a project in lieu of the residential child care impact fee. Each such unit must have at least 2 bedrooms, be at least 1,000 square feet in size, and serve at least 4 children at any one time. This amendment would also require that any such units be maintained for the life of the project.

7. Contributions or Incentives for Sustainable Transportation

Amendment. The proposed amendments to Contributions or Incentives for Sustainable Transportation would enable a fare product, such as an institutional pass, that provides monthly full-access to Muni to be considered equivalent to providing the monthly Muni only “M” pass if provided at a rate of one pass per Dwelling Unit or employee. This amendment would also specify that the contribution or incentive is for public transit or public transportation provider, unless approved by the SFMTA. Lastly, this amendment would remove the cost of membership language, as it is redundant with other language, and correct typos .

Discussion: The SFMTA is considering the creation of an Institutional Pass program, available to institutions, employers, buildings, etc. Similar to the existing Class Pass program, an Institutional Pass program would enable the purchase of monthly passes for all eligible residents or employees at a bulk cost. This would make this measure more likely to be selected by more projects. Should the SFMTA adopt such a fare product, this amendment would make it an eligible option that is considered equivalent to providing the monthly Muni only “M”.

Some developers have inquired about the ability to use this measure to support residents’ or tenants’ use of private transit. Private transit options are proliferating in San Francisco. Some may present services that reduce vehicle miles traveled. However, with unique operations, performance, and longevity, the City would like to retain the ability to approve which services may be eligible for the contributions or incentives associated with this measure.

Non-Substantive Amendments

The following amendments do not require Planning Commission action, but are provided for your information and review.

8. Bike Share Membership

Amendment: The amendment to this TDM measure would be consistent with the amendments described above in Contributions and Incentives.

Discussion. The amendment would only occur if the Contributions and Incentives amendments are adopted.

9. Delivery Supportive Amenities

Amendment: The amendment to this TDM measure would avoid the need for a staffed reception area.

Discussion. The purpose of this measure is to provide space for delivery services. Given technology capability (e.g., text message notifications), a staffed reception area is not necessary. Therefore, “staffed” has been deleted and other edits have been provided to further clarify this measure.

10. Multimodal Wayfinding Signage Clarification

Amendment: The amendment to this TDM measure would ensure that wayfinding signage is placed and installed in a manner to withstand weather elements.

Discussion. This is a clarification to ensure the long-term visibility of the signage.

11. Tailored Transportation Marketing Services

Amendment: The amendment to this TDM measure would be consistent with the amendments described above in Contributions and Incentives.

Discussion. The amendment would only occur if the Contributions and Incentives amendments are adopted.

12. Unbundle Parking and Parking Supply

Amendment: The measures would amend the residential neighborhood parking rate calculations.

Discussion. The neighborhood parking rate map and spreadsheet for residential uses is being refined to reflect a record search of building permits from the Department of Building Inspection (see Attachment D for further explanation and revised greater than one unit map). The current neighborhood parking rate map and spreadsheet for residential uses is based upon a

methodology that assumes the current zoning district parking requirements or allowances are a proxy for estimating parking supply. The methodology capped the amount at one parking space per dwelling unit for any location. The new methodology using a record search of building permits generally results in higher neighborhood parking rates for residential uses in most areas.

13. Group Housing Clarification

Amendment: This amendment clarifies that a Group Housing bedroom is interchangeable with a Dwelling Unit for any TDM measure provision that is wholly, or in part, based on the number of Dwelling Units in a project.

Discussion. The TDM Program is intended to capture Group Housing projects, and Group Housing is included as one of the triggers for the TDM Program in the proposed TDM ordinance. However, as currently adopted, TDM measures in Appendix A of the TDM Program Standards only refer to Dwelling Units. This amendment will clarify that the measures are intended to treat Group Housing bedrooms the same as Dwelling Units.

Other Potential TDM Measures

Through staff's continued stakeholder outreach, several new TDM measures have been discussed and analyzed. Staff will continue to review these measures, along with other new measures proposed in the future. More specifically, a study produced by TransForm shows a relationship between VMT, proximity to transit, and household income as a percent of Area Median Income. As such, staff is actively working to prepare an adjustment to the on-site affordable housing measure to better reflect the reduction of VMT from higher levels of affordability. Additionally, staff is exploring further the concept of an "innovation" measure to encourage developers to implement new TDM ideas that are not included in the adopted menu.

REVISIONS TO THE TDM ORDINANCE SINCE AUGUST 2016

The Land Use and Transportation Committee of the Board of Supervisors voted to make several amendments to the TDM Ordinance. A copy of the most current version of the draft ordinance is attached, which includes all amendments to date from the Land Use and Transportation Committee.

Affordable Housing Findings – Section 169.1(i)

Amendment: Supervisor Avalos introduced the amendment to the TDM Ordinance to state the policy rationale for exempting affordable housing from the TDM Ordinance, including citing a specific study regarding how low-income households drive less than higher-income households.

Discussion: Staff has recognized the literature regarding this finding by including an on-site affordable housing measure in the TDM menu. Additionally, staff is actively working to develop an amendment to that specific measure to better reflect the reduction of VMT from higher levels of affordability.

Grandfathering and Phasing – Section 169.3(e)

Amendment: Supervisor Cohen proposed the amendment to the TDM Ordinance to partially grandfather projects that filed a development application before the ordinance was received by the Board of Supervisors. Additionally, the amendment creates a phasing-in of point targets over the next year. Specifically, the amendment reduces the target by certain percentages, depending upon the date a development project filed a development application.

Discussion: Staff recommended at previous Planning Commission hearings that no phase in or "grandfathering" of the TDM Program should apply because of the extensive outreach and notification process conducted to date. One of the benefits of the TDM Program is to provide more certainty to project sponsors in the development review process. This would occur through a project sponsor knowing their TDM measure requirements upfront, prior to submitting a development application.

Concern was expressed that if a development project submitted a development application prior to the TDM Program legislation being submitted to the Board of Supervisors, those upfront requirements may have been unknown or not considered imminent. Therefore, it may be challenging for a development project to meet the target identified in the TDM Program Standards. Additionally, meeting the target may also be challenging for those developers that have already begun the development process (e.g., public outreach) but have not yet submitted the first development application. The amendments were made to the TDM Ordinance to address this challenge.

Review of TDM Plan at Pre-application Meetings – Section 169.4(a)

Amendment: Supervisor Avalos proposed the amendment to the TDM Ordinance to require development projects with a pre-application community meeting to present a draft TDM Plan and solicit feedback at such meeting from the community.

Discussion: Staff raised concerns the following concerns about this amendment because the pre-application meeting is not referenced anywhere in the Planning Code and no other Planning Code provision has such a requirement. Instead, the pre-application meeting is a Planning Department policy intended to inform the public early on about projects and allow for high-level feedback. The intent of the meeting is not to review every detail, as these may not be known by the project sponsor given the meeting can occur months prior to filing a development application. Reviewing the draft TDM Plan at this early point of the entitlement process may result in providing the public with a level of detail and certainty that does not actually exist, and as such, result in misunderstandings about what may ultimately be included in the TDM Plan.

Review of TDM Plan at Pre-application Meetings – Section 169.6(c)

Amendment: Supervisor Avalos proposed the amendment to the TDM Ordinance to require the Planning Department to only present its four-year report to the Board of Supervisors if requested by a member of the Board of Supervisors.

Discussion: This will reduce potentially unnecessary presentations to the full Board of Supervisors.

OTHER ISSUES RAISED REGARDING THE TDM ORDINANCE

Staff is aware of several issues that may be discussed further at future Board of Supervisors hearings for the TDM Ordinance. Each issue is summarized below:

1. **Grandfathering and Phasing.** The current grandfathering and phasing language in the Ordinance only applies to projects that have submitted a Development Application. Many grandfathering provisions in the Planning Code rely on the submittal of an Environmental Evaluation (EE) application. It is likely that the issue of whether the Development Application or EE is appropriate for grandfathering will be discussed further by the Board of Supervisors.
2. **Draft TDM Plan at Pre-application.** It is likely that the requirement for projects to share a draft TDM Plan at their pre-application meeting will be discussed further by the Board of Supervisors.
3. **First Year Implementation Analysis and Report.** Because the TDM Program is a completely new and robust program, it is likely that the idea of a first-year analysis of the program will be discussed further by the Board of Supervisors.
4. **Ongoing Monitoring and Reporting.** As further discussed below, it is likely that there will be further discussion by the Board of Supervisors regarding how to better ensure the monitoring and reporting component of the TDM Program is, and remains, effective.

5. **Group Housing.** The current Group Housing trigger for applicability of the TDM Program is 10 Group Housing beds. However, Group Housing bedrooms were the intended metric, and is the more common metric used in the Planning Code. As such, it is likely that this issue will be discussed further by the Board of Supervisors.
6. **Timing of TDM Program Standards with TDM Plan.** Currently, the TDM Ordinance states that the Development Project shall be subject to the TDM Program Standards in effect at the time of its first Development *Project Approval*. Comments have been raised that the Development Project shall be subject to the TDM Program Standards in effect at the time of its first Development *Application*. As such, it is likely that this issue will be discussed further by the Board of Supervisors, which, may in turn require amendments that can be made administratively to the TDM Program Standards.

OTHER COMMENTS FROM STAKEHOLDERS

Program Applicability

Comment: Both the Residential Builders Association and the San Francisco Human Services Network propose that projects they represent (development projects with 24 units or less and health and human services city-funded non-profits, respectively) should be exempt from the TDM Program entirely or have less requirements, including being exempt from the ongoing monitoring and reporting fee.

Discussion: In the August 4, 2016 Planning Commission Executive Summary, staff recommended health and human services non-profits should remain subject to the TDM Program because the Planning Code typically regulates land uses instead of ownership and tenancy and it could result in a non-compliance with the TDM Program if tenancy changes to a private entity from a health and human services non-profit; these types of organizations contribute impacts to the transportation system; employees of these organizations would benefit from TDM amenities; and in the rare possibility that these organizations would be subject to the TDM Program the buildings in which these organizations occupy typically provide little to no Accessory Parking and thus have limited TDM requirements. At that hearing, the Planning Commission agreed with staff.

Lowering the minimum requirements amendment described above is proposed specifically to address comments that smaller residential projects face in reducing their parking supply. Staff also considered developing a menu consisting of fewer options that smaller residential projects would have to select a certain number of measures to comply with the TDM Program Standards. However, staff felt this would be inconsistent with the rest of the TDM Program and would provide less, not more, flexibility to property owners in complying with the TDM Program Standards. To assist smaller residential projects in complying with the TDM Program Standards, staff will post to the TDM website TDM plans for varying size projects, including smaller residential projects, as options.

Monitoring and Reporting Fee is Disproportional to Small Residential Projects

Comment: The Residential Builders Association provided feedback that the on-going Monitoring and Reporting Fee is not fair to smaller projects.

Discussion: The monitoring fee has been set at the minimum that is expected to be required to recover the costs associated with monitoring compliance with the program. Reviewing a small project's compliance documentation should not take significantly different amount of time from reviewing a large project's compliance documentation. However, if complicated or very large projects require resources in excess of the base fee, they will be charged time and materials so that full costs are recovered. Additionally, time spent on compliance monitoring will be tracked. Should a lower base rate, or some other rate schedule be justified, staff would recommend a change to the rate or rate structure.

Provision of Car-share Space and Childcare in Residential Zoning Districts

Comment: Feedback from one developer was concerned that a project in a Residential zoning district would not be able to provide space for car-share or for childcare, asserting that they are not allowed uses in those districts.

Discussion: Car-share is required for any project, in any zoning district, that includes 50 or more Dwelling Units and provides on-site accessory parking. Additionally, existing residential accessory parking that is required by the Planning Code may be converted to car-share spaces in any zoning district. Currently, childcare is permitted as a conditional use in almost all Residential zoning districts.

Ongoing Monitoring and Reporting

Comment: At the December 5, 2016 Land Use Committee hearing, Supervisor Peskin asked two questions related to ongoing monitoring and reporting: 1) whether the TDM requirements could be recorded in a homeowner association's (HOA's) Covenants, Conditions, and Restrictions (CC&Rs), and 2) how the Planning Department will ensure that the monitoring actually happens during economic downturns when there may be lower levels of staffing.

Discussion: All TDM requirements that are part of a project's TDM Plan will be recorded as a notice of special restriction (NSR) on the project's deed. Such NSRs are fully enforceable against the original owner and all subsequent successors to ownership, including individual homeowners in a common interest development. The Department will include language in the conditions of approval for a project, where applicable, and in the NSR that makes the applicability to subsequent owners clear. CC&Rs are private agreements between the owners of common interest developments and are regulated through State law. Thus, adding a requirement to the CC&R's is not an effective approach. The TDM Program includes an annual administrative fee that supports the compliance and monitoring component of the program. Legally, this fee must be spent on services related to the fee's purpose. Furthermore, the TDM Program includes an ongoing monitoring and reporting fee. For Development Projects completed, the ongoing monitoring and reporting fee will be annual or tri-annual funding source that will not be subject to economic cycles that often affect the amount of development applications and associated fees for other types of applications.

Neighborhood Specific Requirements

Comment: A reoccurring comment has risen regarding specific requirements for different neighborhoods, particularly those with a transportation system already heavily constrained by vehicles.

Discussion: One of the important aspects of the TDM Program is to be nimble, responsive, and up-to-date regarding new technologies, data, and policies that are aimed at reducing VMT. This includes potentially adjusting the VMT targets set for new development based upon all new development's contribution to a city or regional VMT reduction goal. For example, this goal could be an outcome of Connect SF, after that effort's visioning and scenario planning are conducted. It is challenging to set a neighborhood goal without the completion of such larger geographic scale planning efforts first. As a simplified proposal, the TDM Program Standards in the future could be amended to require Development Projects in areas of the City with greater vehicular capacity constraints (e.g., C-3 districts or new Area Plans) to be subject to a greater base target than other areas of the City.

REQUIRED COMMISSION ACTION

The proposed Resolution is before the Commission so that it may adopt the proposed substantive amendments to the TDM Program Standards.

RECOMMENDATION

The Department recommends that the Commission may adopt the proposed substantive amendments to the TDM Program Standards.

BASIS FOR RECOMMENDATION

The TDM Program Standards are intended to be updated over time. The amendments within are the result of further outreach and feedback with a variety of stakeholder to implement an effective, flexible, and feasible TDM Program from the start of this long-term program.

ENVIRONMENTAL REVIEW

The action described herein is subject to review under the California Environmental Quality Act. The requisite environmental review has been completed, a Categorical Exemption has been issued, and the Certificate of Categorical Exemption was included as Attachment F Certificate of Categorical Exemption in the August 4th, 2016 Executive Summary.

RECOMMENDATION: Adopt

Attachments:

Attachment A: TDM Program Resources and Background Information

Attachment B: Current Draft TDM Ordinance

Attachment C: Draft Resolution Recommending Approval of the proposed amendments to the TDM Program Standards (including Exhibit A)

Attachment D: Residential Neighborhood Parking Rate Methodology Memo

ATTACHMENT A: TDM PROGRAM RESOURCES AND BACKGROUND INFORMATION

Executive Summary
Hearing Date: January 19, 2017

**Transportation Sustainability Program – Shift
Amendments to the TDM Program Standards**

ATTACHMENT B: CURRENT DRAFT TDM ORDINANCE

Executive Summary
Hearing Date: January 19, 2017

Transportation Sustainability Program – Shift
Amendments to the TDM Program Standards

**ATTACHMENT C: DRAFT RESOLUTION RECOMMENDING APPROVAL OF THE PROPOSED
AMENDMENTS TO THE TDM PROGRAM STANDARDS (INCLUDING EXHIBIT A)**

Executive Summary
Hearing Date: January 19, 2017

**Transportation Sustainability Program – Shift
Amendments to the TDM Program Standards**

ATTACHMENT D: RESIDENTIAL NEIGHBORHOOD PARKING RATE METHODOLOGY MEMO