
From: Poling, Jeanie (CPC)
Sent: Monday, September 09, 2019 5:47 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY
Attachments: INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY.docx

From: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Sent: Friday, September 06, 2019 10:43 AM
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Subject: FW: INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY

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From: aj <ajahjah@att.net>
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Subject: INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY

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Planning Commission:

I am a Muni Railway retiree. I worked for 33 years as Operator, Dispatcher, Inspector, Instructor for the the lines that will be directly affected by the Reservoir Project.

Given my--as well as other front-line MUNI workers'--direct experience, it is ludicrous to claim that the Balboa Reservoir will have less-than-significant impact on transit delay.

Please take the following submission into consideration in your evaluation of the Balboa Reservoir EIR.

Thanks.

Alvin Ja

INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY

The City Charter/SFMTA late criterion is a 4 minute delay relative to MUNI schedule for the 43 Masonic at the Balboa Park Station (BPS). [The 4 minute lateness criterion is relative to MUNI schedule for any particular MUNI time point.]

In comparison, the Reservoir late standard as applied for the segment from Monterey/Genessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The Reservoir Project SEIR, apparently without proper authority, appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus giving the Project the privilege of contributing 8 minutes of Reservoir-related delay before its delay is considered significant.

EXAMPLE:

If a 43 is running on time until the Reservoir Project, but the Project-related delay is allowed to be up to 8 minutes, then instead of 7 minutes to get to BPS, it would be considered by SEIR definition to be insignificant if a 43 gets to BPS in 19 minutes—an additional 12 minutes.

This constitutes a **171% increase over the scheduled running time of 7 minutes** between Monterey/Genessee and Balboa Park Station. Yet the SEIR deems a **171% increase** (from a scheduled 7 minutes to a travel time of 19 minutes) to be insignificant.

SOUTHBOUND 43 MASONIC DELAY:					
MUNI STANDARD v. RESERVOIR STANDARD					
		TIME POINT	ON-TIME	ADDITIONAL DELAY TIME	
			MUNI on-time	MUNI late standard (4 min)	Reservoir Late standard (additional 4 min)
		Monterey/Genessee	0:00	0:00	0:00
Monterey/Genn to Bookstore		4 min running time	+4 r.t.	+4 r.t. + 4 late	+4 r.t. +4 MUNI +4 Reservoir
Running time (r.t.)					
ELAPSED TIME:		CCSF Bookstore	0:04	0:08	0:12

Monterey/Genn to Bookstore		(City College Terminal)			
Bookstore to BPS		3 min running time	+3 r.t.	+3 r.t.	+3 r.t. + 4 Reservoir
Running time				(4 min standard NOT allowed to be cumulative)	(4 min standard construed to accumulate)
ELAPSED TIME:		Balboa Park Station			
Monterey/Gen to BPS		(Geneva/San Jose)	0:07	0:11	0:19

The SEIR justifies its arbitrary and capricious use of a generously defined 4-minute delay standard by citing the MUNI on-time performance standard contained in the City Charter:

The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.⁹⁶

Footnote 96:

96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85 [sic--should be 8A.103 (c)1--a]], percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

It is critically important to understand of the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or **four minutes late as measured against a published schedule that includes time points***

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

The SEIR is inadequate and defective in its use of an egregiously generous definition of acceptable Reservoir-related transit delay. The SEIR's "less-than-significant" determination for Impact TR-4, Transit Delay cannot be considered valid.

The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, or by common sense--in City

Charter VIII.A. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.

There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay. There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.

Submitted by:

Alvin Ja