

## CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY

**The “less-than-significant” determination for Impact TR-4 is invalid. It is invalid because its 4-minute threshold of significance/Performance Standard is arbitrarily high and has been arrived at with neither proper authority nor substantial evidence.**

**Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would violate the Transit First Policy.**

**Although the SEIR finds potentially significant impact for C-TR- 4, the potential impact is unfairly attributed to City College’s FMP.**

**The actual real-world impact will be from the Reservoir Project; not City College. As such, the Reservoir Project’s true impact to Transit Delay has been covered up by an egregiously liberal 4-minute threshold of significance. As such, the LTS determination for Impact TR-4 should objectively be invalid.**

**City College’s future plans are fundamentally renovation projects to replace worn-out facilities. These renovation projects will not, in and of themselves—unlike the Reservoir Project—induce substantially greater demand for education services and resultant travel demand.**

**The SEIR blames the victim in its discussion of Impact C-TR-4.**

I wish to reinforce my earlier analysis of the inappropriateness of using a 4-minute threshold of significance in reaching a “less-than-significant” determination for Impact TR-4.

I have already provided several critiques of various aspects of the SEIR’s analyses contained in Section 3.B, Transportation & Circulation.

I have already compared the numbers for “Project-Related Increase in Delay” provided in Table 3.B-18, *Transit Delay Analysis*. I compared the Project-Related Delay to scheduled MUNI running times for the 43 line.

My analysis showed:

*Option 1's "Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment between Monterey/Genessee and Balboa Park Station.*

*Option 2's contribution of 141 seconds (2.4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Genessee to Balboa Park Station.*

I have analyzed the latest MUNI schedule information. I have attached a Table entitled "Reservoir-Related Delay in Relation to Reservoir Area MUNI Characteristics."

The Table compiles information gathered from official MUNI scheduling documents. The documents are "Rotations" and "Trains" that contain information on headways and timepoints.

The Table shows the percentage contribution of real-world Reservoir-related delay relative to current MUNI timepoint-to-timepoint running times, using the SEIR's 4-minute threshold of significance.

Percentage of increase in travel time over the existing MUNI running times are:

- K Ingleside (between Geneva/San Jose and St. Francis Circle: 23.5% to 30.8%
- 8/ 8BX Bayshore/ Bayshore Express (Geneva/Mission-Unity Plaza) 50.0% to 66.7%
- 29 Sunset (19<sup>th</sup>/Holloway – Ocean/BART) 25.0% to 33.3%
- 43 Masonic (Monterey/Genessee – Geneva BART) 44.4% to 57.1%
- 49 Van Ness (Mission/Ocean – Unity Plaza) 50.0% to 57.1%

**The lowest end of the range of Reservoir-related delay "authorized" by the SEIR is 23.5% increase over the K segment between Balboa Park Station and St. Francis Circle.**

**A threshold of significance that would allow 23.5% to 66.7% increases over existing running times is an egregiously poor threshold.**

**FAIL and FUBAR.**

Submitted by:

Alvin Ja