From: Poling, Jeanie (CPC)
Sent: Monday, September 16, 2019 7:10 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY
Attachments: Comment 12.docx; RESERVOIR-RELATED DELAY.docx

From: aj <ajahjah@att.net>
Sent: Saturday, September 14, 2019 9:04 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>; CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Cc: BRCAC (ECN) <brcac@sfgov.org>
Subject: CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY

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/Gennessee 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/Gennessee 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 (19th/Holloway – Ocean/BART) 25.0% to 33.3%
- 43 Masonic (Monterey/Gennessee – 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

LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes		
SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)	
K Ingleside	AM PEAK	MID-DAY	PM PEAK	KT Geneva/San Jose- St. Francis Circle	23.5% to 30.8%	100%	
	IB: 9-12	IB & OB: 10	IB: 9-10	AM: 14 MID-DAY: 13 PM: 17			
	OB:		OB:	AM: 15			

	8-10		8-10	MID-DAY: 15 PM: 16			
8/8BX Bayshore	AM PEAK	MID-DAY	PM PEAK	8/8BX Geneva/Mission– Unity Plaza	(For Inbound only) 50% to 66.7%	100%	
	IB: 6-7	IB: 7	IB: 6-7	AM: 8 MID-DAY: 6 PM: 8			
	OB: 7	OB: 7-8	OB: 7	(not available) AM: MID-DAY: PM:			
LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME FOR ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes		
					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)	
29 Sunset	AM PEAK	MID-DAY	PM PEAK	29 19TH/Holloway- Ocean BART	25% to 33.3%	100%	
	IB: 9	IB &	IB: 10-12	AM: 12 MID-DAY: 14			

		OB:		PM: 15-17			
	OB: 10	12	OB: 10	AM: 15-16 MID-DAY: 15 PM: 16			
43 Masonic	AM PEAK	MID-DAY	PM PEAK	43 Monterey/ Gennessee-Geneva BART	44.4% to 57.1%	100%	
	IB: 9	IB & OB: 12	IB: 10	AM: 9 MID-DAY: 8 PM: 8			
	OB: 10		OB: 10	AM: 7-8 MID-DAY: 7 PM: 7			

LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes	
					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)

49 Van Ness	AM PEAK	MID-DAY	PM PEAK	49 Mission/Ocean- Unity Plaza	50.0% to 57.1%	100%	
	IB: 8	IB & OB: 9	IB: 8	AM: 8-9 MID-DAY: 8 PM: 9			
	OB: 10		OB: 7-8	AM: 8 MID-DAY: 7 PM: 8			
54 Felton	AM PEAK	MID-DAY	PM PEAK	54 Geneva/Mission- Geneva BART			
	IB & OB: 20 min			AM: 4 MID-DAY: 4 PM: 5			
				AM: 4-5 MID-DAY: 4 PM: 5			