

**2018-007883ENV**

**BALBOA RESERVOIR PROJECT – (Assessor’s Block 3180, Lot 190)**

**Public Hearing on the Draft Environmental Impact Report**

Submitted by Rita Evans, 226 Judson Avenue

### **SHUTTLE—WHERE IS THE SHUTTLE???**

Members of the public participating in the public input process for the Balboa Reservoir development have consistently, repeatedly, and loudly requested that a developer-funded shuttle be part of the solution to the traffic and transportation problems created by the project. The shuttle would run between the Balboa Reservoir site and the Balboa Park Station and would also serve students, faculty and staff at City College of San Francisco.

We believe that a free shuttle with frequent service is an absolutely necessity if the residents of the BR project are actually expected to use public transit. Since this expectation of public transit use is an essential component of a successful project, every reasonable measure to promote the use of transit must be used. In a city saturated with shuttle buses, this a logical part of the solution. The shuttle idea has been brought in public meetings, in meetings with the developer, in meetings with city representatives, and at neighborhood association meetings.

Despite this consistent, loud call for a shuttle, there is no mention of any shuttle in the SEIR. It does not appear to have even been discussed as part of the effort to manage transportation demand. This is a huge deficiency that must be corrected before the SEIR is approved.

### **TRANSIT ASSESSMENT**

#### **C2 Transit Assessment Memorandum**

##### **Transit reentry delay analysis**

According to the SEIR, transit delay is calculated based on empirical data from 2010 *Highway Capacity Manual (HCM)*. Data used in the 2010 *HCM* are at least 15 years old.

In 2016, the *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (HCM)* was published by the Transportation Research Board. This current manual the consultants should have used as “...it serves as a fundamental reference on concepts, performance measures, and analysis techniques for evaluating the **multimodal** operation of streets, highways, freeways, and off-street pathways. The Sixth Edition incorporates the latest research on highway capacity, quality of service, and travel time reliability...”

What justification did the consultants provide for using an outdated *HCM* and its outdated data? Why did they not use the most recent, comprehensive source that addresses the multimodal aspect of street use, a basic component of the area around the Balboa Reservoir project site?

Before the SEIR is adopted, the consultants must explain their data sources and methodology used to reach their conclusion that, “Based on the findings from this corridor delay analysis, the project would not result in a substantial delay to public transit along Frida Kahlo Way, Ocean Avenue, or Geneva Avenue.” The findings and conclusion as presented in the SEIR are erroneous.

### **Passenger boarding delay analysis**

What source was used to assume “two seconds per passenger boarding”? Is it again outdated data? Does it include students and instructors carrying books, supplies, and other material? Does it include students traveling with children? Disabled users? Riders carrying shopping bags or using a wheeled cart?

The consultants again are using an arbitrary and likely outdated standard—two seconds of boarding time—that does not equate to actual operating conditions.

Before the SEIR is adopted, data on the actual passenger boarding delay must be gathered and analyzed. Any transit delay analysis must be based on the actual delay experienced by riders in the project area.

### **City College Loop analysis**

The consultant concludes that despite increases in traffic volume, no additional delay will be generated. Consultant makes repeated reference to “existing signal timing coordination and optimization.” As anyone who travels these corridors knows, having actuated signals and having those signals actually work are two different things. Broken and mis-timed signals have plagued traffic on Phelan/Frida Kahlo for years and the city has either ignored the problems or addressed them only after years of complaints.

There is no assurance that the signal timing problems experienced on Frida Kahlo Way will not recur. We have no reason to believe the city will be more responsive to addressing timing and optimization problems in the future than they have been in the past.

It is erroneous for the SEIR to assume that the presence of actuated signals and signal optimization will address traffic delay in the project area. A firm commitment from the city for regular, scheduled monitoring and maintenance of the traffic signals in the area is a necessary component of addressing transportation issues in the project area. Such a commitment must be in place before the SEIR is approved.

### **C1 Travel Demand Memorandum**

This section refers repeatedly to two sources for trip generation data. One is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10<sup>th</sup> edition and the other is the *San Francisco Planning Trip Generation Workbook (SF Workbook)*. While the ITE *Trip Generation Manual* is indeed a standard source, it also is recognized as a very flawed source of information due to its reliance on datasets with very little input, generally from suburban, not urban, sources.

The *SF Workbook* is not available on the Planning Department’s website nor does it appear to be available elsewhere. We are unable to determine whether it addresses any of the flaws mentioned or simply compounds them. If the SEIR and consultants are referencing this Planning Department *SF Workbook*, it must be made publicly available for review and comment.

We challenge the use of the trip generation data from the *ITE Manual* and we find the use of the *SF Workbook*, which appears not to be available to the public, as inappropriate.