

COMMENT ON

“Summary of Impacts of Proposed Project—Disclosed in SEIR including Initial Study” Table s-2

IMPACT TR-4 (Operation of proposed project would not substantially delay public transit)

Table S-2 shows for Impact TR-4 **Less-than-significant** Level of Significance.

I summarize how this determination is incorrect.

1. The threshold of significance that is used to come to the LTS determination is based on an inordinately low standard for the threshold. The establishment of a 4-minute late threshold before Reservoir-related transit delay “might” be considered significant is big enough for a tank to go through. By defining the transit delay threshold to be 4 minutes, the Reservoir Project is issued a “get out of jail free card”.
2. The City Charter establishes performance criteria for MUNI. Section 8.A 103 (c) establishes that a MUNI bus/car that arrives over 4 minutes late to a timepoint is considered to be late, for the purposes of the City Charter mandate.
3. The SEIR/Reservoir Project threshold of significance gives the Project the privilege of independently adding 4 minutes of additional delay to MUNI before the Reservoir Project transit delay “might” be considered significant. This freedom and privilege to independently add 4 minutes Reservoir-related delay flies in the face of the intent of the Transit First Policy.
4. Attached for your convenience, I include 3 tables:
 - a. SB 43 Masonic Delay: MUNI Standard v. Reservoir Standard
 - This Table relates to the 43 line between the Monterey/Genessee timepoint and the Balboa Park Station timepoint:
 - The running time between the two timepoints is 7 minutes;
 - The MUNI late standard is 11 minutes;
 - The SEIR/Project threshold of significance is 19 minutes: a **171% increase over the scheduled 7 minutes.**
 - b. SEIR Table 3.B-18 Transit Delay Analysis
 - This Table presents SEIR’s own numbers for “Project-Related Increase in Delay”
 - The Table lowballs the actual delay for the 43 Masonic. The SEIR presents delays of 73 seconds and 83 seconds for Options 1 and 2, respectively. The numbers presented by the SEIR omit the 43 segment between City College Bookstore and Balboa Park Station.

When the Bookstore-BPS segment (Geneva Ave EB) is factored in properly, the delays come out instead to 115 seconds (1.9 minutes) and 141 seconds (2.4 minutes) for Options 1 and 2, respectively. 115 seconds and 141 seconds of Project-related delay constitute **increases of 27.4% and 33.6% over the 7-minute Monterey/Gennessee-BP Station segment's running time.**

- Comparing the Reservoir-related delay for the 43's Monterey/Gennessee-BP Station segment to the City-Charter-mandated 4-minute late allowance:
 - Option 1's delay of 115 seconds **consumes 48.0% of the 4 minutes of lateness allowed to MUNI;**
 - Option 2's delay of 141 seconds **consumes 58.8% of the 4 minutes of lateness allowed to MUNI**
- **These percentages of 171%, 27.4%, 33.6%, 48.0%, and 58.8% are objectively significant. These percentages can only be made "less than significant" by the establishment of a threshold of significance of 4 minutes, which is constructively a "get out of jail free card."**
- c. Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics
 - This Table is compiled from current (effective 9/5/2019) MUNI schedules for KT, 8/8BX, 29, 43, 49, 54 lines. For weekday AM Peak, Mid-day, and PM Peak, I have compiled headways and running times.
 - Using the SEIR's 4-minute threshold of significance, the last two columns provide Reservoir Project-related contribution percentages to running time delay and to MUNI's 4-minute late allowance:
 - K Ingleside: **23.5% - 30.8% delay contribution** between BP Station-St. Francis Circle;
 - 8/8BX Bayshore (IB only): **50% - 66.7% delay contribution** between Unity Plaza-Geneva/Mission;
 - 29 Sunset: **25.0% - 33.3% delay contribution** between 19th/Holloway- Balboa Park Station;
 - 43 Masonic: **44.4% - 57.1% delay contribution** between Monterey/Gennessee- Balboa Park Station;
 - 49 Van Ness: **50.0% - 57.1% delay contribution** between Mission/Ocean- Unity Plaza

The LTS determination for Impact TR-4 cannot be objectively sustained. The LTS determination is a case of "intelligence and facts being fixed around policy."

IMPACT C-TR-4 (The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably.)

C-TR-4 is founded on a distortion of reality. Via manipulation of the threshold of significance for evaluating transit delay, the impact of the Balboa Reservoir Project has been determined to be less-than-significant **for Impact TR-4.**

It is only with willful disregard for reality that the SEIR can come to a conclusion that a 1,110-1,550 unit project will have less than significant impact on an area which the Nelson-Nygaard TDM Study described as having “limited roadway space, transit infrastructure, ...” **in Impact TR-4.**

But ,the SEIR then finds significant cumulative impact for C-TR-4. In the topsy-turvy Red Queen world of the Planning Dept, the 1,100- 1,550 unit Reservoir Project is determined to have LTS impact on transit delay. Yet, the SEIR portrays the CCSF Facilities Master Plan as being a big contributor to future cumulative transit delay despite the fact that the FMP is primarily a replacement and renovation program. A replacement and renovation program will have much less of an impact in increasing travel demand than an 1,100- 1,550 unit new development of mostly market-rate/unaffordable housing.

Mitigation Measure M-C-TR-4:

As discussed in earlier submissions, Table M-C-TR-4 “Transit Travel Time Performance Standard” provides the Reservoir Project an extremely generous allowance of 4 minutes of Reservoir-related transit delay. Merry Christmas!

The damage to transit delay by the Project itself will already have been done before M-C-TR-4’s Monitoring and Implementing Feasible Measures for cumulative impacts even gets rolling.

Given the Nelson-Nygaard TDM Study’s recognition of limited roadway space and transit infrastructure, there will be no feasible measures to implement, other than hoping for success of TDM measures.

Regarding the effectiveness of TDM as mitigation, please examine the attached “Balboa Reservoir’s TDM Non Sequitur.”

Submitted by:

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