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J. Poling

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**BALBOA RESERVOIR PROJECT – (Assessor's Block 3180, Lot 190)  
Public Hearing on the Draft Environmental Impact Report****TRANSIT DELAY**

The SEIR states that transit delay induced by the Balboa Reservoir project will be insignificant but this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The MUNI on-time performance standard allows for a 4-minute delay for an entire route. The SEIR instead allows for a 4-minute delay on any segment of a route (i.e., between two stops), a completely invalid assumption, meaning almost no amount of delay would be considered significant.

EXAMPLE: The 43-Masonic travels from the Balboa Reservoir project site on Frida Kahlo Way to the Balboa Park Station in **7 minutes**. Using the consultants' re-definition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of **19 minutes, a 171% increase**, is somehow deemed "**insignificant**." No one riding that 43 would find the delay to be insignificant. And this utterly faulty reasoning is allowed to be presented in the SEIR as justification for a finding of "insignificant delay," meaning no mitigation is required.

From any perspective, whether legal, ethical or engineering, this is wrong. The SEIR is in error in using this faulty, invalid method of determining transit delay. The transit delays as a result of this project will be significant and appropriate mitigation must be identified before the SEIR is approved.