4.C Transportation and Circulation

The comments and corresponding responses in this section cover topics in draft SEIR Section 3.B, Transportation and Circulation. These include topics related to:

- Comment TR-1: Existing Conditions
- Comment TR-2: Travel Demand
- Comment TR-3: Walking and Biking Impacts
- Comment TR-4: Transit Impacts
- Comment TR-5: Loading Impacts
- Comment TR-6: Cumulative Impacts
- Comment TR-7: Parking
- Comment TR-8: Increased Traffic Congestion and Associated Impacts
- Comment TR-9: General Comments

Comment TR-1: Existing Conditions

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-GOODMAN-6
I-HOUWER-2
I-KOWALSKI-1
I-OSAWA-4

Currently muni buses cannot pull over at Howth to drop passengers and delays in bus services occur regularly at this area. A proposed solution to off-ramp directly into a parking garage on the eastern edge of CCSF could directly alleviate some traffic from heading up Ocean Ave to the existing lots at the reservoir. It should be considered as an alternative, and a feasible solution that lessens the impacts of traffic and on public transit that runs along Ocean Ave.

Please take into consideration the impacts on MUNI systems and the need to address the impacts on transit as a serious concern that garners a broader and possible larger solution or alternative that includes cummalative projects and impacts as the main concern and solution to lessen pedestrian injuries, traffic impacts, and ensuring more rapid flow of public transit systems in this area due to the impacts on the second largest transit hub in SF."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-6*])*

"First of all, anyone who lives in the area understands what a nightmare traffic is already in the morning, afternoon and after work. The busses are already overcrowded with students and commuters. Parking is already virtually impossible with the two existing parking lots for the college."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-2*])*

"I live along Plymouth Avenue with my wife of 18 years, between San Ramon and Ocean. I can attest to the situation of the violence level due to the parking and driving situation.

Westwood Park was built for Model T's and Model A's. Cars have to pull over all the time. The violence level goes on all the time, day and night.

I leave for work at 4:00 o'clock in the morning. People are going at 40 miles per hour on that street and they're bypassing the stop signs at San Ramon Way. They're also running the red light at Ocean Avenue and Plymouth Avenue."

*(Kevin Kowalski, CPC Hearing, September 12, 2019 [*I-KOWALSKI-1*])*

"Ocean Avenue is already beset with heavy traffic at most hours of the day. Traffic is often down to a single lane due to Muni traffic, cars turning left, and double-parked vehicles. This will now become intolerably congested. The existence of several offset intersections (at Ocean/Geneva/Frida Kahlo, Ocean/Brighton, and Ocean/Plymouth) also contributes to poor traffic flow and to vehicular safety issues."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-4*])*

Response TR-1: Existing Conditions

The comments opine on existing traffic and parking conditions near the project site. These comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding traffic congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding of the secondary effects of parking conditions with development of the proposed project are addressed in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the existing conditions comments is organized by the following subtopics:

- Existing Conditions
- Parking

Existing Conditions

The draft SEIR adequately and accurately describes the existing traffic, transit, pedestrian, bicycle, loading, and emergency access conditions around the project site in section 3.B.4, Existing Conditions, on draft SEIR pp. 3.B-5 to 3.B-25, and existing conditions on Plymouth Avenue on draft SEIR p. 6-29. Vehicular turning movement counts are presented in Table 3.B-2, Vehicular Counts at Study Intersections on draft SEIR p. 3.B-10. These conditions have been taken into account in the analysis of the proposed project and in the development of mitigation measures.

The transportation study area and study intersections are discussed starting on draft SEIR p. 3.B-5. The transportation study area covers the transportation network within generally two blocks of the project site and includes Ocean Avenue and Plymouth Avenue. The selected 23 intersections within the transportation study area represent access points to the regional highway system, are located along major street corridors serving the project site, and are in the immediate vicinity of the project site. As a result, these locations represent the intersections most likely to be affected by vehicle traffic generated by the project and are representative of impacts that may occur at other locations. These study intersections are identified by number in Table 3.B-2 on draft SEIR p. 3.B-10, and shown on Figure 3.B-1 on draft SEIR p. 3.B-7. Multimodal turning movement counts (i.e., vehicles, pedestrians, and bicyclists) were collected at the 23 study intersections, including existing site driveways, on Wednesday January 31, 2018, and Tuesday August 28, 2018 when City College was in session during the weekday a.m. (7 to 9 a.m.) and weekday p.m. (4 to 6 p.m.) peak periods. Intersection turning movement counts are included in the Transit Assessment Memorandum (see draft SEIR Appendix C2, Attachment A, on pp. 31 to 63).

Parking

As discussed on draft SEIR p. 3.A-3 and p. 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area, and therefore parking is not an environmental impact for the purposes of CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the draft SEIR presents an analysis of secondary environmental impacts related to City College on draft SEIR Appendix B, pp. B-87 to B-90.

For informational purposes, a discussion of existing and with project parking supply and demand is provided in the Non-CEQA Transportation Analysis, became available to the public on August 1, 2019. This report is available as part of the administrative record and also included as RTC Attachment 3, Non-CEQA Transportation Analysis.[1] As presented in the Non-CEQA Transportation Analysis – Parking Analysis Memorandum, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). There are a total of 906 parking spaces within the neighborhood on-street parking

[1] Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019. http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf

study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during a.m., midday, and p.m. periods.

Comment TR-2: Travel Demand

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-25
I-EVANS2-6
I-HOUWER-6
I-MUHLHEIM-2
I-MUHLHEIM-6
I-OSAWA-7
O-BRCAC-1

"The Notice of Preparation states that: "The proposed project would include a transportation demand management (TDM) program that would implement measures to reduce vehicle trips and encourage sustainable modes of transportation. TDM measures may include both physical (e.g., bicycle and carshare parking) and programmatic (e.g., incentives)." (Oct. 10, 2018 NOP, p. 20)

In a December 31, 2017, memo to the Commissioners of the SF County Transportation Authority, Supervisor Norman Yee stated: 'The TDM Framework is a first step in planning TDM efforts for the Balboa Area. As the Reservoir developer and City College begin to draft implementable plans, community input will continue to play a significant role. Transportation and TDM will be discussed in ongoing public meetings for the City College Facilities Master Plan, Balboa Reservoir and other Community Advisory Committees. Only after further public engagement and exploration of TDM programs will the Reservoir developer and City College draft more detailed, implementable TDM plans.'

Accordingly, the FSEIR must include a completed TDM. A Final SEIR should not be circulated until this completed TDM has been incorporated into the FSEIR.

Project travel demand refers to the number, type, and common destinations of new trips that people would take to and from the project. The memorandum containing the detailed methodology and results for the project travel demand is included in DSEIR Appendix C1, Travel Demand Memorandum.

The TDM Plan that was submitted by Kittelson in Appendix C1 is incomplete. It is a survey of trip generation and parking, but there is no analysis of alternative sources of travel or transit use. This omission is unacceptable. A complete and competent TDM Plan must be included in the FSEIR. Failure to do so would result in an inadequate EIR which should not be certified.

Additionally, for the reasons set forth herewith, the Kittleson report is flawed, and does not provide a competent basis for transportation mitigation:

- The Kittelson TDM does not engage with important current transportation characteristics in the project area which would likely be impacted and transformed by the scale and intensity of the proposed development alternatives.
- The report indicates that the trip generation manual being employed is somewhat out of date but the most recent available.
- Recent academic studies in the last year have observed that there has been a very substantial increase in trips and congestion over the past two Years. They estimate that 40% of this increased congestion may be estimated to be attributed to Lyft and Uber car service trips. In the mode choice allocations the report models car service trips are treated as a small segment, less than 10%?
- Even if one estimates that car service trips are both a mode choice switch and a cause of changing traffic through increased trip generation… there are no level of service discussions LOS for morning and afternoon peaks and for off peak mid day… for the main streets serving the project. What is traffic like and what might be the impacts of increased trips on the level of service in the project area and on adjacent arterials serving the project area. And how might one assess the cumulative transportation impacts of this project and planned development adjacent to the project area?
- The expected distribution of trips for residents seems very light for peak period travel. Is there any current transportation trip generation and travel diary data that might be employed to validate the time of day assumptions for residents of the new development?
- The current assumptions for residents are quite variant from the conceptual estimate of student trips that might be estimated from the parking lot driveway analysis… where we see a high density of trips around the morning and afternoon peaks. If the apartment dwellers trip characteristics more clearly follow the patterning of student car trips there may be serious congestion and LOS impacts. How might you assess this possible outcome? Particularly where you don't provide LOS data for main circulation routes."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-25*])*

"**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*, 10th 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."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-6*])*

"No doubt techies will uber or lyft to where they need to go; therefore, you will see an influx of additional traffic in our area."

*(Michelle Houwer, Email, September 12, 2019 [*I-HOUWER-6*])*

"<!--[if !supportLists]-->2. <!--[endif]--> I find the report's statements regarding transportation and traffic greatly underestimate the impacts of the proposed project. As a transit first person, who has commuted to CCSF on MUNI from Castro and Market for several years, I have had experience with existing delays and trouble spots. Especially troubling are statements where mitigation is not found necessary. I disagree."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-2*])*

"<!--[if !supportLists]-->· <!--[endif]-->Many residents in the proposed project will opt for ride sharing services. We are seen the negative effects of this on congestion in other parts of the city."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-6*])*

"The proposed site is indeed closely situated to many public transit options. However, given the proximity to I-280, the uphill walk to BART, and the remoteness from many of the attractions of the city, it is highly optimistic to assume that there will be a mass influx of non-automotive households that would mitigate the traffic and parking burden.

I appreciate the need for more housing in San Francisco, but the current proposals are out of scale for the neighborhood and have not adequately addressed critical deficiencies in traffic flow and parking."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-7*])*

"Good evening Commissioners. My name's Jon Winston. I have the at large seat on the Balboa Reservoir CAC and I'm also the Chair.

I'm here this afternoon -- this evening, I should say, to talk about transportation and circulation. The impacts I believe will be significant, but I disagree with the report that they will be unmitigable.

Developer mitigation, including the Transportation Demand Management Plan, including measures like giving out a Fast Pass with rental packages to encourage non-car use will play a part. They will pay impact fees, which I believe should be applied at the point of impact in the neighborhood where the impacts actually occur. That's where they're needed the most.

But also, the City can and must do more Recent San Francisco history is full of projects, like the Metreon Center, the San Francisco Center, the ballpark, the Chase Center, all built without parking and they were all predicted to lead to traffic apocalypse.

But with moonshot level planning, by multiple city agencies, we got great civic and cultural amenities that, despite the naysayers, worked.

This, too, is a project that needs to have proactive planning on the neighborhood and City level to accommodate the influx of new residents in the reservoir and the projected increase in CCSF students.

New housing and businesses, like Whole Foods on Ocean Avenue, also add new car, foot and bike traffic.

SFMTA and other agencies need to begin, now, to be ready with increased transit frequency and have more of the share of the roadway to avoid even worse gridlock and in keeping with the City's transit first policy. That's the first time we've heard the words "transit first" tonight.

In addition to my role on this CAC, I also serve as the Pedestrian Safety Advisor Committee for the SFUSD. From that perch, I can see Ocean, Geneva, San Jose Avenue as vision zero high injury corridors. That means there have been enough deaths and injuries, serious injuries, due to the design of these streets that they're due and fundable for complete redesign.

In short, true transit first reimagining of transportation and circulation for the neighborhood is needed and it has to be implemented.

At our September 30th CAC meeting, the CAC will present their plans for their SFMTA Ocean Avenue Safety Project. I hope to hear about a safe, beautiful, and dignified walk to BART, and better pedestrian bicycle access to CCSF, the reservoir and the Ocean Avenue shopping district.

But in future meetings, I really hope to hear more about a comprehensive, proactive plan. The Balboa Reservoir is really a great opportunity to deal with the problems that have accumulated over many, many years and now, we have a chance to make the needed change to get a livable, sustainable community for future generations. Thank you for your time."

*(Jon Winston, Chair, Balboa Reservoir Community Advisory Committee, CPC Hearing, September 12, 2019 [*O-BRCAC-1*])*

Response TR-2: Travel Demand

The comments state that the travel demand analysis is inadequate, disagree with the draft SEIR findings or characterize them differently, and state that transportation network company (TNC) mode choice allocation is underestimated. Comments state that the transportation demand management (TDM) plan is inadequate and that a complete TDM plan should be included in the draft SEIR. The comments also seek information about the travel demand workbook used to estimate travel demand for the project.

The draft SEIR addresses the relevant CEQA issues in Section 3.B, Transportation and Circulation, under "Transportation Demand Management (TDM) Plan" on draft SEIR p. 3.B-38 and "Project Travel Demand Methodology and Results" on draft SEIR pp. 3.B-40 to 3.B-46. Detailed supporting information is included in SEIR Appendix C1, Travel Demand Memorandum, and Appendix C2, Transit Assessment Memorandum. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding traffic congestion, including intersection delay and level of service, are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding potential impacts of the proposed project on transit operations, and the mitigation measure(s) proposed to address any such impacts, are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-32. Comments regarding potential impacts of the proposed project in combination with other planned area development are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-45. Comments regarding the secondary effects of parking conditions with development of the proposed project is provided in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the travel demand analysis comments is organized by the following subtopics:

- Project Travel Demand Methodology and Results
- Transportation Network Company (TNC) Mode Share
- Transportation Demand Management (TDM) Plan

Project Travel Demand Methodology and Results

The San Francisco workbook (workbook) referenced by the commenter implements the travel demand methodology presented in the 2019 San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019 (2019 TIA Guidelines).[2] The transportation analysis for the Balboa Reservoir Project used this workbook to generate the project's anticipated travel demand.

[2] San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019. https://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf. Accessed October 24, 2019.

The travel demand methodology and results are presented in draft SEIR Appendix C1 and on draft SEIR pp. 3.B-40 to 3.B-46 under the heading "Project Travel Demand Methodology and Results." The analysis for the proposed project follows the methodology presented in the 2019 TIA Guidelines, to the extent applicable. The project travel demand calculations are presented in draft SEIR Appendix C1, Travel Demand Memorandum, on pp. 8-14. The specific approach used for the proposed project is provided in the Travel Demand Assumptions Memorandum, which is included in draft SEIR Appendix C1, pp. 21 to 26. The detailed travel demand calculation worksheets are presented in draft SEIR Appendix C1, Appendix A, on pp. 27 to 39. These calculation worksheets document the input and show the calculations and distribution assumptions used to develop the travel demand estimates.

The workbook is publicly available. The detailed travel demand calculation worksheets were also made public as part of the draft SEIR's administrative record[3] and the workbook is included as RTC Attachment 4, Travel Demand Workbook. The department website includes a link to a travel demand tool (https://sftraveldemand.sfcta.org/) that can be used to calculate daily and weekday p.m. peak hour person trips generation using the 2019 TIA Guidelines rates, which mirrors the data in the workbook.

The travel demand tool was developed as part of the department's 2019 TIA Guidelines update. A consultant, under the direction of the department, collected and analyzed counts, intercept surveys (i.e., intercept people to ask questions), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data. This collection and analysis led to the 2019 TIA Guidelines travel demand updates including estimates of the number of people taking TNCs. The TIA Guidelines' Summary of Changes memorandum describes the primary changes made in the update compared to prior guidelines.[4]

Regarding the comment seeking information on the use of the ITE's Trip Generation Manual, the 10th Edition of ITE's *Trip Generation Manual* was used to develop a ratio between the Balboa Reservoir Project's a.m. and p.m. peak period trip generation rates rather than to generate an estimate of project travel. Because the 2019 TIA Guidelines provide daily and p.m. peak hour travel demand rates but not a.m. peak hour travel demand rates, the ratio from the ITE *Trip Generation Manual* was applied to p.m. peak hour rates to obtain an estimate of a.m. peak hour rates. This process is explained on draft SEIR Appendix C1, p. 4.

One commenter correctly notes that no analysis is provided in the draft SEIR for the off-peak midday period. For the purpose of environmental review, the transportation analysis is based on the period with the highest traffic volumes; this yields a more conservative or "worst case" scenario to determine project impacts. The p.m. peak hour has the highest traffic volumes when compared to the traffic volumes during the a.m. peak period; the midday period is considered an

[3] Draft SEIR Appendix C1: Travel Demand Memorandum, April 4, 2019. *http://ab900balboa.com/Draft%20EIR,%20Appendices,%20and%20Related/C1_TravelDemandMemorandum.pdf*

[4] San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review – Update, October 2019, *https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.*

off-peak period, for which any project impacts or effects would be less acute than the peak period.

Transportation Network Company (TNC) Mode Share

Transportation network company (TNC) vehicle trips are accounted for in the draft SEIR. TNC mode share is discussed and presented on draft SEIR p. 3.B-43 and Table 3.B-13, Person-Trip Generation Estimates by Mode and Land Use, on draft SEIR p. 3.B-43, and Table 3.B-16, Freight and Passenger Loading Demand by Land Use, on draft SEIR p. 3.B-51.

The comments claim that TNC use is underestimated; however, the comments do not cite references to support their claims. The SEIR analysis employs the best available information regarding TNC mode share. This information was developed as part of the department's 2019 TIA Guidelines update as described above.

The increasing prevalence of for-hire vehicles like TNCs in San Francisco has changed the way people travel. The department is working with the transportation authority and SFMTA on studies that address TNC activity in San Francisco. The TNC use and passenger loading demand estimates analyzed in the draft SEIR are consistent with 2019 TIA Guidelines and are supported by substantial evidence based on available information.

Transportation Demand Management (TDM) Plan

One commenter disagrees with the draft SEIR findings that the proposed project's significant and unavoidable transportation and circulation impacts cannot be mitigated to a less-than-significant level and references how the project's TDM plan would reduce vehicle trips. The 2019 TIA Guidelines travel demand data is based on substantial data collection, including at development sites in 2016 and 2017, and is described above. However, the 2019 TIA Guidelines data collection scope did not analyze the effect of development sites' TDM measures on travel demand. Thus, the department does not account for any potential reduction in vehicle trips (e.g., mode split change) that may occur with implementation of a project's TDM plan. This approach results in a conservative estimation of the number of vehicle trips that would be generated by the proposed project. The department is working with other San Francisco agencies to quantify the effects of TDM measures for use in CEQA documents as part of ongoing research in support of San Francisco Planning Code section 169. The results of that research are not yet available.

Transportation studies within San Francisco typically do not account for any potential reduction in vehicle trips that may occur with implementation of the TDM plan. The department acknowledges that implementation of the TDM plan would improve conditions around the project site; however, the draft SEIR and the department makes its CEQA significance determination without accounting for the implementation of the TDM measures. Aside from referencing the TDM plan, the commenter does not provide substantial evidence demonstrating how a final TDM plan is required to conduct transportation and circulation impact analysis.

It should be noted that the draft SEIR Appendix C1 referenced by the commenter is not the proposed project's TDM plan. Draft SEIR Appendix C1 is a memorandum providing the basis for the draft SEIR's analysis of project transportation impacts. The TDM plan is being developed

separately, and a finalize TDM plan is required by City statute to be included as a condition of approval of the development project (planning code, section 169.4(c)). Furthermore, planning code section 169.4(e) states that "[t]he Zoning Administrator shall approve and order the recordation of a Notice in the Official Records of the Recorder of the City and County of San Francisco for the subject property prior to the issuance of a building or site permit. This Notice shall include the Development Project's final TDM Plan and detailed descriptions of each TDM measure."

Comment TR-3: Walking and Biking Impacts

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list:

A-CALTRANS-1

"**Bicycle Considerations**

The Caltrans District 4 Bike Plan identifies a "Top Tier" project at the I-280 and Ocean Avenue/Geneva Avenue interchange that would reconstruct the interchange ramps and stripe Class II buffered bike lanes. Given the anticipated increase in vehicle and bicycle traffic at this location due to the project, the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at this location."

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [*A-CALTRANS-1*])*

Response TR-3: Walking and Biking Impacts

The comment states that the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at the I-280 and Ocean Avenue/Geneva Avenue interchange.

In accordance with 2019 TIA Guidelines, the department adequately and accurately assessed if the project would create potentially hazardous conditions for people bicycling. The draft SEIR describes existing bicycling facilities and circulation in the project area on draft SEIR pp. 3.B-14 to 3.B-18. General impediments to existing bicycle travel within the study area, including heavy vehicle traffic volumes and high-speed uncontrolled movements at freeway ramps, are discussed on draft SEIR p. 3.B-16. The effect of the proposed project on conditions for people bicycling is discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

Existing bicycle conditions at freeway on- and off-ramps at I-280 and at the Ocean Avenue/Geneva Avenue interchange have been taken into account in the project analysis. This location is farther from the project site than other analyzed locations (e.g., Ocean Avenue/Lee Avenue, Frida Kahlo Way/Access Road, Ocean Avenue/Frida Kahlo Way/Geneva Avenue) and thus represents a location with a smaller share of the distributed project trips. At the analyzed

locations in closer proximity to the project site, the draft SEIR concludes that the proposed project would not generate activities that would create potentially hazardous conditions for people bicycling. Thus, significant impacts would not be expected at the Ocean Avenue/Geneva Avenue interchange and no mitigation measures would be required. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comment TR-4: Transit Impacts

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-27	I-JA8-2	I-MARTINPINTO-3
I-BERNSTEIN5-5	I-JA9-2	I-MUHLHEIM-4
I-COLLINS1-1	I-JA9-3	I-PEDERSON2-3
I-EVANS2-1	I-JA9-4	I-PEDERSON2-9
I-EVANS2-3	I-JA10-1	I-PEDERSON2-10
I-EVANS2-4	I-JA13-1	I-PEDERSON1-3
I-GOODMAN-5	I-JA15-1	I-WORLEY-5
I-JA1-3	I-MARTINPINTO-2	
I-JA7-1		

"Public Transit Delay (p. 3.B – 51 et seq)

There are significant and unavoidable cumulative transit impacts identified by the DSEIR.

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. (Significant and Unavoidable with Mitigation)*

Impact C-TR-6b: *Operation of the proposed project, including proposed street network changes, in combination with reasonably foreseeable future projects, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. (Significant and Unavoidable)*

The DSEIR also states:

Impact TR-4: *Operation of the proposed project would not substantially delay public transit. (Less than Significant)*

However, the DSEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence.

The City Charter/SFMTA late criterion is a 4 minute delay relative to the MUNI schedule.

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The DSEIR appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus the DSEIR reinterprets the MUNI 4-minute lateness standard to allow the Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant. This is an invalid, flawed analysis of acceptable transit delays. The FSEIR must recalculate transit delays validly.

Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would also violate the City's Transit First Policy."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-27*])*

"The impact that the extra traffic would have on buses—one of the common means of reaching the College (other than BART) is expected to be serious. A local retired bus driver has explained that a bus being late on one time point by four minutes results in a serious schedule problem. But for the no. 43 bus, the only bus running on Frida Kahlo Way, the delay anticipated is more like 12 minutes, not four minutes. This would affect other lines that cross the path of the 43 bus or connect with it. And as for Ocean Avenue, it currently has a number of lines passing within 1-2 blocks of the College—nos. 8, 29, 49 and K."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-5*])*

"Hello, Monica Collins, Sunnyside. This is prepared.

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 meaning on time performance standards allows for a four-minute delay for an entire route. But the 43 Masonic travels from Balboa Reservoir, along Frida Kahlo Way, to Balboa Park in seven minutes. Using the consultant's redefinition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of 19 minutes, 171 percent increase. 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."

*(Monica Collins, CPC Hearing, September 12, 2019 [*I-COLLINS1-1*])*

"**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."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-1*])*

"**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."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-3*])*

"**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."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-4*])*

"The second one is regarding transit delay. Okay, transit delay is defined in this SEIR with a threshold of significance. And it's an invented threshold of significance. And what does the SEIR say: The threshold of significance is four minutes. What does that mean in terms of the reservoir? It means that, oh, the reservoir project can contribute four minutes of delay on MUNI without it being considered to be significant. So, it's BS. Okay, read it carefully before you certify it."

*(Alvin Ja, CPC Hearing, September 12, 2019 [*I-JA1-3*])*

"The transit issue is by far the biggest concern, as was very much ignored as a concern on the SFSU-CSU and Parkmerced and Stonestown redevelopment projects, congestion has worsened along 19th, and with eventual starting of undergrounding of the M-Line, additional concerns will increase on cross-city traffic and transit impacts. It is not possible to force one development to bear the brunt of the costs of public infrastructure, however when multiple sites are involved it is critical to ensure that the publics interests and impacts are seriously addressed in regards to safety, and continuity of public transit services."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-5*])*

"INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY

The City Charter/SFMTA late criterion is a 4 minute delay relative to MUNI schedule for the 43 Masonic at the Balboa Park Station (BPS). [The 4 minute lateness criterion is relative to MUNI schedule for any particular MUNI time point.]

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The Reservoir Project SEIR, apparently without proper authority, appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus giving the Project the privilege of contributing 8 minutes of Reservoir-related delay before its delay is considered significant.

EXAMPLE:

If a 43 is running on time until the Reservoir Project, but the Project-related delay is allowed to be up to 8 minutes, then instead of 7 minutes to get to BPS, it would be considered by SEIR definition to be insignificant if a 43 gets to BPS in 19 minutes—an additional 12 minutes.

This constitutes a 171% increase over the scheduled running time of 7 minutes between Monterey/Gennessee and Balboa Park Station. Yet the SEIR deems a **171% increase** (from a scheduled 7 minutes to a travel time of 19 minutes to be insignificant.

SOUTHBOUND 43 MASONIC DELAY:

MUNI STANDARD v. RESERVOIR STANDARD

	TIME POINT	ON-TIME	ADDITIONAL DELAY TIME	
		MUNI on-time	MUNI late standard (4 min)	Reservoir Late standard (additional 4 min)
	Monterey/Gennessee	0:00	0:00	0:00
Monterey/Genn to Bookstore Running time (r.t.)	**4 min running time**	+4 r.t.	+4 r.t. + 4 late	+4 r.t. +4 MUNI +4 Reservoir
ELAPSED TIME: Monterey/Genn to Bookstore	CCSF Bookstore (City College Terminal)	**0:04**	**0:08**	**0:12**
Bookstore to BPS Running time	**3 min running time**	+3 r.t.	+3 r.t. (4 min standard NOT allowed to be cumulative)	+3 r.t. + 4 Reservoir (4 min standard construed to accumulate)
ELAPSED TIME: Monterey/Gen to BPS	Balboa Park Station (Geneva/San Jose)	**0:07**	**0:11**	**0:19**

The SEIR justifies its arbitrary and capricious use of a generously defined 4-minute delay standard by citing the MUNI on-time performance standard contained in the City Charter:

The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.[1]

It is critically important to understand of the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

The SEIR is inadequate and defective in its use of an egregiously generous definition of acceptable Reservoir-related transit delay. The SEIR's "less-than-significant" determination for Impact TR-4, Transit Delay cannot be considered valid.

The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, or by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.

There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay. There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant."

Footnotes:

1 *The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85 [sic--should be 8A.103 (c)1--aj], percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

*(Alvin Ja, Email, September 5, 2019 [*I-JA7-1*])*

"Public Transit Delay (p. 3.B-52)

The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.[96]

Footnote 96: *96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85* [sic--should be 8A.103 (c)1--aj]*, percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

Example: The 43 line runs on a 12 minute headway. A four-minute Project-related contribution to delay added to a City Charter defined 4-minute late standard for a MUNI line's on-time performance would create an eight-minute delay. So, for the 43 line, instead of a 12-16 wait, the Project interprets that a wait of 16-20 minutes at Kahlo/Ocean (City College Bookstore time point) is acceptable and less-than-significant.

NO! It is NOT OK to consider this to be non-significant.

The City Charter's section 8A.103(c)1 does not authorize the Project to impose an additional Reservoir-related 4 minutes of delay at the City College Bookstore time point.

The SEIR's self-defined threshold of significance would grant the Project the privilege of doubling the lateness standard relative to the MUNI schedule from 4 minutes to 8 minutes.

This violates both the language and intent of City Charter Article VIIIA's Section on Service Standards and Accountability--8A.103 (c)1.

The draft SEIR is fundamentally flawed in highjacking and misapplying the SFMTA/MUNI 4-minute lateness standard. The 4-minute lateness standard is relative to MUNI schedules. The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, and especially by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.

There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay.

There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.

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Impact Evaluation

Existing plus Project

Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)

Transit Delay

Developer's Proposed Option (p. 3.B-74)

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, the Developer's Proposed Option would result in a less-than-significant impact related to transit delay.

The Additional Housing Option would not result in transit delay greater than or equal to four Minutes. 123 Therefore, the Additional Housing Option would result in a less-than-significant impact related to transit delay. [FOOTNOTE 123 refers back to Footnote 122 which then refers to Fire Code 503.2.1 which has nothing to do with transit delay.—aj]

RESERVOIR-RELATED DELAY FOR 43 MASONIC

The SB Kahlo figures of **73 sec** (for Option 1), and **83 sec** (for Option 2 are presented in the SEIR as the applicable 43 delay between Judson and Ocean.

These figures fail to reflect the Transit Delay for the 43 route segment between CCSF Bookstore (Ocean) to Balboa Park Station (Geneva/San Jose). This route segment is located in the Area Plan area and must be included to properly assess Reservoir-related delay for the 43 Masonic.

In order to reflect the full effect of Reservoir-related delay in the Balboa Park Station Area Plan area, another 42 seconds (using Table 3.B-18 Transit Delay Analysis) for the 43's EB Geneva segment must be added to the 73 seconds cited by the SEIR. So instead of just 73 seconds of delay, Reservoir-related delay totals **115 seconds (1.9 min) of for Option 1**.

For Option 2, the 43's delay (using Table 3.B-18 Transit Delay Analysis) should be the sum of SB Kahlo (83 sec) and EB Geneva (58 sec), which totals **141 seconds (2.4 min) of Reservoir-related delay in the BPS Area Plan area**.

The scheduled running time between Monterey/Gennessee to Balboa Park Station is 7 minutes.

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.

A 115-141 second delay for this short 43 segment (from Monterey/Gennessee to BP Station) is substantial. it is NOT insignificant as the SEIR purports. Only with willful disregard for reality could a 27.4% to 33.6% increase in travel time be considered less than significant.

Relative to the City Charter-mandated MUNI on-time standard of 4 minutes:

<!--[if !supportLists]-->· <!--[endif]-->Option 1's 115 second contribution to MUNI delay constitutes **48.0%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point;

<!--[if !supportLists]-->· <!--[endif]-->Option 2's 141 second contribution to MUNI delay constitutes **58.8%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point.

Unless willfully blind, a 48.0% or a 58.8% contribution towards a 4-minute late standard is SIGNIFICANT.

The way that the SEIR tries to evade this problem of objectively contributing significantly towards MUNI's 4-minute standard is ingenious.

Incorporating Footnote 96 on p. 3.B-52, the SEIR, **insinuating City Charter and "quantitative" authority, proclaims**:

The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.

The SEIR blows open a gigantic hole of an extra four minutes for itself before a delay "might" (!!) be significant. But contrary to the Project's arrogation to itself of a four-minute privilege to hold up MUNI before its contribution to delay counts to be significant, the City Charter citation of a 4 minute is relative to the MUNI schedule—not relative to the Reservoir Project SEIR's own standard.

So, the "less-than significant impact" to transit delay is a result of an inappropriate definition and standard of "transit delay."

I discuss this in more detail in my 9/5/2019 submission "INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY". Please refer to it.

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City College Terminal

Given the considerations described above, the Developer's Proposed Option and Additional Housing Option would have a ***less-than-significant impact*** *on transit delay.*

Mitigation: *None required.*

The TR-4 section ends with the pronouncement of less-than-significant impact requiring no mitigation. This overall TR-4 conclusory statement misleadingly follows and is slid into a section that actually discusses City College Terminal.

This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:

The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:

<!--[if !supportLists]-->· <!--[endif]-->**It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**

<!--[if !supportLists]-->· <!--[endif]-->**It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**

<!--[if !supportLists]-->· <!--[endif]-->**In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay**.

<!--[if !supportLists]-->· <!--[endif]-->**The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee**.

Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:

The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.

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Comparison of Impact TR-4 to PEIR Impact Analysis **(p. 3.B-77)**

As discussed in SEIR Section 3.B.3, Summary of Balboa Park Station Area Plan PEIR Transportation Section, p. 3.B-1, under the 2025 with Area Plan scenario, ….. Project operation would result in a less-than significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR.

The statements that *"Project operation would result in a less-than-significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR"* **is unsupported by anything contained in SEIR 3.B.3**. It appears out of thin air. In fact, 3.B.3 states the opposite:

<!--[if !supportLists]-->· <!--[endif]-->**Transit**

Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.

Furthermore, the claimed L-T-S impact of the Introductory paragraph for this section is contradicted once again in the body on p. 3.B-78:

<!--[if !supportLists]-->· <!--[endif]-->*The PEIR identified significant impacts to transit delay under the 2025 with Area Plan scenario and project-level analysis of 1150 Ocean Avenue (former Kragen Auto Parts site).*

The introductory paragraph expresses a desired outcome of less–than-significant impact on public transit in the form of an unsupported assertion/conclusion. The SEIR is deficient by making unsupported conclusions.

****

Operation of the Balboa Reservoir Project would result in a less-than-significant impact related to transit delay. Therefore, the proposed project would not have any new or substantially more-severe effects than those identified in the PEIR related to transit delay impacts.

This concluding paragraph for TR-4 is nothing but a claim unsupported by evidence. It's a tautology: The Reservoir Project results in less-than-significant impact on transit delay……Therefore (?!!) it will not have new transit delay impacts.

Where is the logic in this conclusion?!!!

The SEIR Significance Criteria states:

The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.

SEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence. Rather it is based on tautology. FAIL…FUBAR! This SEIR does not qualify for certification."

*(Alvin Ja, Email, September 7, 2019 [*I-JA8-2*])*

2040 Cumulative Conditions (p. 3.B-91)

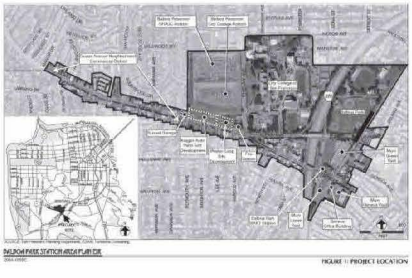
> *The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:

> *The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*



The SEIR is deficient in its selection of the parameters of geographic context for analysis.

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-1*], [*I-JA9-3*])*

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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. (Significant and Unavoidable with Mitigation) (p. 3.B-94)

In the PEIR, under the 2025 with Area Plan scenario, transit delay impacts were identified at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections. However, as discussed under Impact TR-4, p. 3.B-73, operation of the proposed project would not substantially delay public transit, and this impact would be less than significant.

In my previous submission of 9/7/2019, I had presented a picture of the real-life impact, based on SEIR/Kittelson's figures of Reservoir-related delay on the 43 Masonic. Instead of just using the delay figures for the restrictive limits of geographic context in the Figure 3.B-2 map, the submission showed **27.4 to 33.6% increases in Reservoir-related travel time** within the BPS Area Plan "Project Area".

Relative to the MUNI on-time-performance's late criterion of 4 minutes, **Reservoir- related delay contributes 48 to 58.8% of the 4 minutes**.

The only way that the SEIR can conclude a less-than-significant transit delay impact is to change the standards.

It did this by creating a quantitative "threshold of significance" of an **additional 4 minutes over and above the SF Charter's 4 minutes**. Thus, with this this creatively invented threshold of significance that totals 8 minutes, <u>objectively significant delay relative to MUNI schedules</u> are magically transformed into "less-than-significant."

Here's copy & paste from my previous submission:

This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:

The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:

<!--[if !supportLists]-->· <!--[endif]--> **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**

<!--[if !supportLists]-->· <!--[endif]--> **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**

<!--[if !supportLists]-->· <!--[endif]--> **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**

<!--[if !supportLists]-->· <!--[endif]--> **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj)**

probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.

Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:

The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.

****

As discussed in Table 3.B-18, p. 3.B-74, under Impact TR-4, under existing plus project

conditions, the increase in transit delay associated with either the Developer's Proposed Option and the Additional Housing Option would not result in significant transit delay impacts. However, the transit delay contribution from City College's Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.

As shown previously, that Reservoir-related delay "would not result in significant transit delay Impacts" has been shown to be objectively false.

After the false assertion that portrays the Reservoir Project as blameless for transit delay, C-TR- 4 then throws the blame for cumulative Transit Delay on City College when its Facilities Master Plan gets up and running in the future. The phrasing of the passage essentially shifts the blame for cumulative transit delay impacts on City College, instead of admitting that the primary/proximate cause for transit delay is the Project itself.

The main error in C-TR-4 is that the Reservoir is presumed to be the baseline condition when in fact City College should be treated as the baseline condition.

Crucially, City College's Facilities Master Plan is essentially a **renovation and replacement program** for existing deteriorated, end-of-useful life buildings/facilities. Other than normal growth, build-out of the FMP will not generate new, appreciably substantial vehicle trips above what exists today as the existing condition. Furthermore any parking structures in FMP would be a direct result of the Reservoir Project's elimination of student parking. Although the Planning Dept would want to categorize FMP parking as new, objectively the FMP parking will be replacement parking, not "new."

In contrast, it is the Reservoir Project's new residents that will generate new vehicle trips that would cause transit delay.

The SEIR reverses cause and effect in C-TR-4. It does this by treating the Reservoir Project as if it's the existing setting in its assessment of cumulative effects and treats CCSF as the new kid on the block. The fact of the matter is that CCSF must be treated as the baseline condition, and the Reservoir Project as the new kid on the block. I offer as an example a critique of a 11/17/2016 Planning Dept letter that was sent to City College authorities:

HYPOCRISY OF BALBOA RESERVOIR PROJECT PLANNERS

In reviewing Sunshine Ordinance documents, I have come across a 11/17/2016 Planning Dept letter addressed to City College BOT signed by its Director, John Rahaim (attached for your convenience).

The 11/17/2016 letter provided the City's input on the City College draft FMP.

Under the heading of "Access, Parking, and Transportation Demand Management", the letter states:

"CCSF has stated that it anticipates maintaining or increasing the number of parking spaces associated with the campus as on-and off-campus surface parking is replaced with buildings. This level of parking provision would have negative consequences for neighborhood congestion…"

Further down in the letter, under the heading "Balboa Reservoir Development Access & Interface", the letter states:

"While the design of the Reservoir site has not yet begun, roadway access to the Reservoir site [cutting through City College property—aj] *is a critical element that needs to be considered now as part of CCSF's master planning process…"*

Back in November 2016 when you first read this letter, I assume that BOT and Administration were able to discern the brazen hypocrisy contained in this letter to SFCCD.

ONE STANDARD FOR CITY COLLEGE……

The City had the audacity in this letter to blame the FMP for negative consequences of proposed FMP parking. The City shows lack of self-awareness and dishonesty when the reason for needing replacement parking is ultimately the Balboa Reservoir's own elimination of student parking—parking which constitutes the existing condition.

……..ANOTHER STANDARD FOR BALBOA RESERVOIR PROJECT

The Planning Dept letter raises the importance for SFCCD to provide roadway access for the Reservoir Project. The letter says "roadway access is a critical element that needs to be considered now…"

Since the City planners say that the parking needs of CCSF stakeholders can be resolved with TDM, the TDM solution should obviate the need for roadway access for the Reservoir Project, too, doncha think?

But, no. A double standard applies.

Did you notice that the City's concern for "negative consequences for neighborhood congestion" only applied to City College, but not to the Reservoir Project? FYI, throughout the "public engagement process", Reservoir Project has not shown serious concern for its own negative consequences.

If BOT and Administration allow the City to abuse the City College stakeholders whose interests you are supposed to represent, you are failing in your compliance with Accreditation Standard IV.C4.

--aj 10/9/2017

To reduce the project's considerable contribution, implementation of ***Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay*** *was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures to keep transit travel times within four minutes of existing levels.*

Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay. *The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

Transit Travel Time Performance Standard. *Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4. The routes and study segments shown in Table M-C-TR-4 represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.*

What is the "transit travel time performance standard" that is to be met?

The SEIR presents Table M-C-TR-4 Transit Travel Time Performance Standard that, by appearance looks oh, so impressive and credible, and "quantitative"! The Table presents "Existing Transit Travel Time" and "Performance Standard." And it looks SOOO legitimate and objective!

But the key is literally in the fine print of Performance Standards' Footnote "b".

Footnote "b" states: b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

As presented in earlier submissions this Performance Standard of "existing travel time plus four minutes" is based on the misappropriation and misuse of the Charter section 8A.103(c)1.

Here I present some examples of the increase in travel time that results from the generous "plus four minutes" Performance Standard based on figures from Table MC-TR-4:

Transit Line	Study Segment	Existing Transit Travel Time--PM	Performance Standard--PM	Percent Increase in Travel Time
K/T	Jules Ave/Ocean Ave to Balboa Park BART	8:42	12:42	46.0%
29	Mission St/Persia Ave to Plymouth Ave/ Ocean Ave	9:55	15:10	52.9%
43	Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance	4:23	8:23	91.3%
49	Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave	10:04	14:04	39.7%

The Planning Dept-created threshold of significance of an additional 4 minutes results in in**creases in Reservoir-related travel times of 46%, 52.9%, 91.3%, and 39.7% respectively for the K-T, 29, 43, and 49 line segments in the Table. By any objective measure, these would be extremely substantial contributions to transit delay**.

The only legitimate standard to be used to comply with the Transit First Policy is: four minutes late as measured against a MUNI time point…….Not a "plus 4" creatively designed qualitative threshold of significance.

Regarding Mitigation Measure M-C-TR-4's *"The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments…. the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

ARE YOU KIDDING ME?!! Monitor and implement "**feasible**" measures?!!

Once the Project has been approved and built, monitoring will only confirm what people who have actual ground-level, real-life based experience in the area have been saying all along about traffic issues that would ultimately cause severe MUNI delay.

And at that point, there will be no **feasible** measures to implement because the damage will have already been done. There will be no feasible measures because the Reservoir Project the project area is characterized by streets that cannot be widened. There will be no feasible way to effectively reduce transit delay. A 2012 Haas School of Business study about a possible Reservoir

Project recognized the difficulties of *"… limited access points and large influx of new residents"*. for such a project.

To think that monitoring transit delay and implementing "feasible" measures such as TDM will be able to satisfactorily mitigate the impact of the Reservoir would be ludicrous.

Thankfully, the SEIR arrives at a realistic determination (except for the undue blame given to a City College contribution to future transit delay) for C-TR-4:

In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and the uncertainty of SFMTA approval of other measures under their jurisdiction, the impact of the proposed project options would remain ***significant and unavoidable with mitigation****, even with implementation of Mitigation Measure M-C-TR-4.*

Significance after Mitigation: *Significant and Unavoidable."*

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-2*], [*I-JA9-4*])*

"I had sent in a comment regarding the geographic context for analysis of transit delay yesterday, 9/9 /2019.

I said that the appropriate geographic context would be the BPS Area Plan's "Project Area."

However, on closer examination, I realized that the BPS Project Area's northern boundary was Judson and Havelock, and did not even include Riordan.

The geographic context for analysis needs to extend beyond the BPS Area Plan's northern boundary of Judson to include Monterey Blvd.

Although not inside the BPS Area Plan's boundaries, the Reservoir Project will impact areas north of the Reservoir lot itself and north of Judson."

*(Alvin Ja, Email, September 10, 2019 [*I-JA10-1*])*

"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:

<!--[if !supportLists]-->· <!--[endif]-->K Ingleside (between Geneva/San Jose and St. Francis Circle): 23.5% to 30.8%

<!--[if !supportLists]-->· <!--[endif]-->8/ 8BX Bayshore/ Bayshore Express (Geneva/Mission-Unity Plaza) 50.0% to 66.7%

<!--[if !supportLists]-->· <!--[endif]-->29 Sunset (19th/Holloway –Ocean/BART) 25.0% to 33.3%

<!--[if !supportLists]-->· <!--[endif]-->43 Masonic (Monterey/Gennessee – Geneva BART) 44.4% to 57.1%

<!--[if !supportLists]-->· <!--[endif]-->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."

*(Alvin Ja, Email, September 14, 2019 [*I-JA13-1*])*

"What I was trying to, but failed to get across in the original version was that the determinations for TR-4 and C-TR-4 were reversed…..That the C-TR-4 significant impact finding should have been for TR-4; and that the CCSF FMP cumulative contribution to transit delay was being blamed disproportionately for contributions to transit delay.

C-TR-4 obscures the reality that most of the transit delay will be generated by the Reservoir Project, as opposed the City College's FMP which is mainly a renovation and replacement program."

*(Alvin Ja, Email, September 22, 2019 [*I-JA15-1*])*

"Another significant impact to public services is in public transit, i.e. MUNI. Currently, according to city charter, if a MUNI vehicle is 4 or more minutes late to any timepoint, it is considered late. A timepoint is a MUNI passenger stop with a specific time of MUNI vehicle arrival tied to it. For example, if a bus is scheduled to arrive at the intersection of Market and Castro Sts. at 0700 hrs, it is not considered late until it arrives after 0704 hrs.

A 4 minute delay on a bus route such as the 43 Masonic, which is a 9 mile cross town bus route will have effects that resonate throughout the entire bus line. If the 43 northbound is delayed by 4 minutes arriving to Balboa Park BART station, it would be considered significantly late by city charter standards. However, the SEIR doesn't consider MUNI to be late through the Balboa Reservoir project zone unless it is delayed by 4 minutes, independent of the city charter. Thus, if the 43 Masonic was late to Balboa Park BART station by 3 minutes and further delayed through the BR Project zone by another 3 minutes, it would not be considered significant by SEIR standards, but it would be considered significant by city charter standards. Thus the allowable delay of 4 minutes through the BR project zone could be in violation of city charter standards."

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-2*])*

"What does the project propose to do to expedite bus service"

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-3*])*

"<!--[if !supportLists]-->· <!--[endif]-->The central islands on Ocean Avenue are dangerous. Undergrounding the K line on Ocean would help in many areas, but is this a realistic possibility?"

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-4*])*

"and it does not adequately address potential impacts to public transit"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-3*])*

"C. The Draft does not adequately address the impacts of the project on transit.

The Draft does not adequately explain how the City determined that an additional four minutes of delay for Muni routes in the vicinity of the project should be the threshold of significance for transit delays. Muni currently experiences significant delays related to traffic congestion when City College is in session and to congestion caused by drivers attempting to turn at the intersection of Ocean and Brighton, where the entrance to the Whole Foods parking garage is located. In light of already existing delays for Muni service, the threshold of significance for additional transit delays should be less than four minutes."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-9*])*

"In addition, in order to minimize VMT and GHG emissions associated with the project and with reasonably foreseeable development and expansion at City College, the City should implement transit improvements prior to occupancy of the project. Appropriate prior-to-occupancy mitigation measures include:

<!--[if !supportLists]-->1. <!--[endif]-->Restrict left turns at the intersection of Ocean and Brighton.

<!--[if !supportLists]-->2. <!--[endif]-->Install transit signal preemption or priority at all traffic lights on Ocean between San Jose and Junipero Serra and on Geneva between San Jose and Ocean. (Preemption is preferable, though priority might be acceptable at intersections with major cross streets such as Frida Kahlo and Junipero Serra.)

<!--[if !supportLists]-->3. <!--[endif]-->Give Muni lines higher priority at St. Francis Circle and West Portal. (Although St. Francis Circle and West Portal are a fair distance away from the project, delays there significantly degrade the speed and reliability of the K.)

<!--[if !supportLists]-->4. <!--[endif]-->Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.

<!--[if !supportLists]-->5. <!--[endif]-->Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full. (This could potentially be done as part of an enforcement action to address Whole Foods' violation of loading requirements.)"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-10*])*

"Finally, the transit improvement mitigation measures identified in the draft should not be deferred until after the project is shown to have an adverse impact on transit service. Congestion when City College is in session and congestion associated with the Whole Foods Grocery Store are already impeding transit service. So, the project proponents should be working with MUNI, now, to implement transit improvement measures up front without waiting for proof of additional adverse impacts in the future. Thank you very much."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [*I-PEDERSON1-3*])*

"***The DRAFT SEIR is inadequate because it fails to consider the impact on public transit and recommend that public transit capacity be expanded***

The Developer is counting on a 15% reduction in City College student parking in order to achieve a special project status under AB 900. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate already unreliable and inadequate transit service. **However, the SEIR fails to mandate improvements in infrastructure for public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation**."

*(Jennifer Worley, Email, September 23, 2019 [*I-WORLEY-5*])*

Response TR-4: Transit Impacts

The comments opine on the transit delay significance criteria used in the draft SEIR, disagree with the draft SEIR's transit delay impact conclusion, disagree with the geographic study area used to evaluate transit delay impacts, and suggest mitigation measures to reduce transit delay.

This response provides clarification and background information related to the transit impact analysis presented in the draft SEIR. The impacts are determined to be less than significant under existing plus project conditions and significant and unavoidable under 2040 cumulative conditions.

- The significance criteria are presented on draft SEIR p. 3.B-35, and the transit analysis methodology is discussed on draft SEIR p. 3.B-52.
- Transit impacts are covered under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99.
- Additional discussion of the transit delay assessment is provided in draft SEIR Appendix C2, Transit Assessment Memorandum. A discussion of existing conditions related to walking access to transit is provided on draft SEIR p. 3.B-11, and a discussion of the existing transit boarding islands on Ocean Avenue is presented on draft SEIR p. 3.B-21.
- An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR p. 3.B-65.

Comments regarding project improvements that benefit public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation (i.e., transportation demand management measures) are addressed in Response TR-2, Travel Demand, on RTC p. 4.C-10. Comments regarding the inclusion of the City College facilities master plan in the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55.

The response to transit impacts analysis comments is organized by the following subtopics:

- Transit Significance Criteria Used in the Transit Delay Analysis
- Existing Plus Project Conditions Transit Delay
- Cumulative Conditions Transit Delay
- Potentially Hazardous Conditions – Transit
- Geographic Study Area for Transit
- Mitigation Measures

Transit Significance Criteria Used in the Transit Delay Analysis

As stated on draft SEIR p. 3.B-35, with respect to transit impacts, a project would have a significant effect on the environment if it would substantially delay public transit. In particular, the proposed project could have a significant transit impact if transit travel time increases on a specific route would be greater than, or equal to, four minutes or half of the existing headway for Muni service, whichever is less. The threshold for transit impacts is based on the adopted City Charter section 8A.103 (c)1, which established an 85 percent on-time performance service standard for Muni, which considers vehicles arriving more than four minutes beyond a published schedule time late, and the potential secondary impacts on the physical environment associated with riders who switch to automobile- based modes when transit becomes less convenient.

The 2019 TIA Guidelines indicate that a significant impact could occur if a project would result in transit delay greater than or equal to four minutes. This criterion is based on substantial evidence provided in Appendix I of the 2019 TIA Guidelines (p. I-26) and is explained in a July 20, 2018, SFMTA memorandum included as RTC Attachment 5. The commenters provide no substantial evidence to demonstrate that the information used to develop the criterion is flawed or inadequate.

The department applies this transit delay threshold of significance to each transit route within the study area. If the project adds four additional minutes of total additional delay from the existing condition along an individual transit route, then the project's impact to that transit route could be significant. This application accounts for sources of delay along the transit route within the study area.

Several commenters state that the department's threshold of significance is four minutes in between individual transit line stops; these comments are incorrect. The threshold is four minutes of additional delay to an individual transit line *within* the study area boundaries, which is a more stringent threshold than only *between* individual transit line stops. For example, there are nine stops within the transit delay study area boundary for the 29 Sunset outbound route ~~29 Sunset~~ (i.e., between Plymouth Avenue/Ocean Avenue and Mission Street/Persia Avenue). The draft SEIR analyzes the project's total additional delay between all these stops and compares that total to the four-minute threshold of significance.

Commented [SV1]: Why is this double underlined?

A commenter correctly notes that footnote 96 on draft SEIR p. 3.B-52 includes a typo reference to City Charter section 8A.103. The following edit clarifies the draft SEIR text by providing reference to the City Charter statute that establishes the 85 percent on-time performance service standard. Footnote 96 on draft SEIR p. 3.B-52 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> [96] The threshold uses the adopted the Transit First Policy, City Charter section 8A.103(c)1, 85~~,~~ percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

Existing plus Project Conditions Transit Delay

As described on draft SEIR p. 3.B-52, the analysis methodology assesses three sources of project-related transit delay: traffic congestion delay; transit reentry delay; and passenger boarding delay. Changes in transit travel times were estimated to determine whether the proposed project would increase existing transit travel times on individual routes so that additional transit vehicles would be required to maintain the frequency of service.

Transit impacts are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. Additional discussion of the transit delay assessment is provided in Appendix C2, Transit Assessment Memorandum. The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) is evaluated for transit routes operating along Frida Kahlo Way and Ocean Avenue within the transportation study area. The routes and study segments represent routes and study segments to

which the project would increase vehicle trips and passenger boarding/alighting events, thereby resulting in potential increased transit delay (traffic congestion, transit reentry delay, and passenger boarding delay). As shown in Table 3.B-18, Transit Delay Analysis on draft SEIR p. 3.B-74, the proposed project would not increase transit delays by more than four minutes and, therefore, would result in a less-than-significant impact related to transit delay under existing plus project conditions.

One commenter erroneously states that the draft SEIR uses the 2010 Highway Capacity Manual and that the data are at least 15 years old. First, the draft SEIR uses the 2000 Highway Capacity Manual, not the 2010 Highway Capacity Manual, for reentry delay to transit vehicles. The draft SEIR is consistent with the guidelines in Appendix I: Public Transit, of the 2019 TIA Guidelines Update.[5] The 2000 Highway Capacity Manual includes empirical data that provides transit reentry delay times based on adjacent lane traffic. These data are representative of the likelihood a bus can find gaps to reenter into traffic based on the frequency of adjacent vehicle arrivals. This relationship is not expected to have changed substantively since the data were collected and published because driver acceptance of critical gaps in traffic has not changed. Explanation of this analysis is provided under Impact TR-4 on draft SEIR p. 3.B-52.

One commenter notes that the transit delay analysis does not consider the 43 Masonic line segment between the City College Bookstore and the Balboa Park Bay Area Rapid Transit (BART) Station. The transit delay analysis has been clarified to include the segment between the City College Bookstore (50 Frida Kahlo Way) and the Geneva Avenue/Howth Street stop in both directions, which captures the geographic extent of project-related transit delays to the 43 line. The *Project-Related Change* data presented in draft SEIR Table 3.B-18 below thus accounts for this extended segment through the Ocean Avenue/Geneva Avenue/Frida Kahlo Way intersection. The *Existing Travel Times* data presented in the same table were based on travel time runs for the former analysis segment beginning or ending at the City College Bookstore and have not been reconstructed to match. Thus, the *Existing Transit Travel Time* and *Travel Time Threshold* columns in draft SEIR Table 3.B-18 represent the 43 line between Foerster Street/Monterey Boulevard and the City College South Entrance, with a *lower* estimate of existing travel times and thresholds than if they represented the segment extending to Geneva Avenue/Howth Street. The *Project-Related Change* columns in Table 3.B-18 represent increases for the whole segment and are sufficient to reach a conclusion. The revised analysis does not change the draft SEIR analysis conclusions.

At the time the transit analysis commenced for the draft SEIR, the 2019 TIA Guidelines were still under development. The average per passenger boarding delay number used for the project analysis was two seconds per passenger, as identified under Impact TR-4 on draft SEIR p. 3.B-52. Subsequently, the 2019 TIA Guidelines were published and now recommend using an average of 2.5 seconds of boarding delay per passenger. This 2.5 seconds represents the average per-passenger boarding/alighting time; individual times may vary depending on passenger characteristics, the total number of passengers boarding and alighting, and the distribution

[5] *https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.*

within the bus of boarding and alighting events. The 2.5 seconds uses empirical data from the SFMTA's evaluation of all-door-boarding policy implementation.

For consistency with now-published guidance, the passenger boarding delay numbers are reapplied to proposed project transit delay and are represented in the revised draft SEIR Table 3.B-18, Transit Delay Analysis. The change in assumption from using 2 seconds per passenger to 2.5 seconds per passenger increased the estimated delay as presented in the modified Table 3.B-18 below.

The following clarifies the transit travel times in the draft SEIR in response to the comments and to revise the passenger boarding times. The following clarifications do not change conclusions regarding the level of significance of the project-level and cumulative transit impacts.

The text on draft SEIR pp. 3.B-22 to 3.B-23 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> Muni transit operations in the study area were evaluated using transit delay analysis. The transit delay analysis presents the delay associated with traffic congestion, transit reentry, and passenger boarding along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:
>
> - ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
> - ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
> - ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
> - K/T Third/Ingleside:
> - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
> - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
> - 29 Sunset
> - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
> - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
> - 43 Masonic
> - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
> - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
> - 49 Van Ness/Mission
> - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (inbound)
> - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (outbound)
>
> The results of the transit delay analysis are summarized in **Table 3.B-8, ~~Existing Transit Delay~~ Existing Transit Travel Times**, and provided in Attachment C, Corridor Delay

Analysis Synchro Worksheets, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations, of SEIR Appendix C2, Transit Assessment Memorandum. Transit ridership and capacity analysis are provided in Attachment F (transit ridership and capacity analysis) of SEIR Appendix C2 for informational purposes. Table 3.B-8 presents the estimated ~~seconds of delay a~~ transit vehicle ~~encounters~~ travel times during the a.m. and p.m. peak hours ~~along each of the study corridors~~.

~~TABLE 3.B-8~~
~~EXISTING TRANSIT DELAY~~

	~~Weekday a.m. Peak Hour (seconds of delay)~~		~~Weekday p.m. Peak Hour (seconds of delay)~~	
~~Corridor~~	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~
~~Frida Kahlo Way~~	~~3~~	~~12~~	~~3~~	~~25~~
~~Ocean Avenue~~	~~110~~	~~132~~	~~113~~	~~133~~
~~Geneva Avenue~~	~~70~~	~~48~~	~~66~~	~~41~~

~~SOURCE: Kittelson & Associates Inc., 2018.~~

~~NOTES:~~

~~Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.~~

TABLE 3.B-8
EXISTING TRANSIT TRAVEL TIMES

		Existing Transit Travel Time[a]	
Transit Line	Study Segment	A.M. Peak Period	P.M. Peak Period
K/T	Jules Ave/Ocean Ave to Balboa Park BART (outbound)	3:30	8:42
29	San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave (inbound)	3:28	10:03
	Plymouth Ave/Ocean Ave to Mission St/Persia Ave (outbound)	8:01	12:09
	Mission St/Persia Ave to Plymouth Ave/Ocean Ave (inbound)	7:10	9:55
43	Geneva Avenue/Howth Street to Foerster St/Monterey Blvd (inbound)	4:20	4:37
	Gennessee St/Monterey Blvd to Geneva Avenue/Howth Street (outbound)	4:16	4:23
49	Frida Kahlo Way/City College South Entrance to Mission St/Persia Ave (outbound)	5:39	10:04
	Mission St/Ocean Ave to Frida Kahlo Way/City College South Entrance (inbound)	7:18	11:25

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

As shown in Table 3.B-8, the ~~highest transit delays~~ most variability in transit travel times are experienced along Ocean Avenue ~~between Plymouth Avenue and Judson Avenue~~ in the westbound direction where there is a difference in travel times of over 6.5 minutes between the weekday a.m. and p.m. peak hours. This is primarily caused by the vehicular traffic at the Ocean Avenue/San Jose Avenue intersection during the weekday p.m. peak hour, which operates with an average intersection delay above 100 seconds. Additionally, as a result of the high volume of vehicle traffic ~~volumes~~ in the curbside travel lane on westbound Ocean Avenue (between 900 and 930 vehicles per hour) transit vehicles ~~in this corridor~~ typically experience transit reentry delays of around 11 seconds.

The text on draft SEIR pp. 3.B-73 to 3.B-74 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) was evaluated along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (outbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (inbound)

The results of the transit delay analysis are summarized in **Table 3.B-18, Transit Delay Analysis**~~, and~~. Synchro travel time calculation worksheets presenting transit delay along the corridors are provided in Attachment C, Corridor Delay Analysis Synchro Worksheets~~, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations,~~ of SEIR Appendix C2, Transit Assessment Memorandum and

supplementary transit analysis is provided in the SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

~~TABLE 3.B-18~~
~~TRANSIT DELAY ANALYSIS~~

~~Corridor~~	~~Weekday a.m. Peak Hour (seconds of delay)~~		~~Weekday p.m. Peak Hour (seconds of delay)~~	
	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~
~~Transit Delay~~				
~~Existing Conditions~~				
~~Frida Kahlo Way~~	~~5~~	~~15~~	~~5~~	~~28~~
~~Ocean Avenue~~	~~121~~	~~143~~	~~124~~	~~144~~
~~Geneva Avenue~~	~~79~~	~~53~~	~~75~~	~~46~~
~~Existing plus Developer's Proposed Option~~				
~~Frida Kahlo Way~~	~~18~~	~~74~~	~~29~~	~~101~~
~~Ocean Avenue~~	~~187~~	~~182~~	~~182~~	~~244~~
~~Geneva Avenue~~	~~99~~	~~127~~	~~117~~	~~127~~
~~Existing plus Additional Housing Option~~				
~~Frida Kahlo Way~~	~~21~~	~~87~~	~~46~~	~~111~~
~~Ocean Avenue~~	~~183~~	~~207~~	~~208~~	~~272~~
~~Geneva Avenue~~	~~109~~	~~137~~	~~133~~	~~137~~

~~Corridor~~	~~Weekday a.m. Peak Hour (seconds of delay)~~		~~Weekday p.m. Peak Hour (seconds of delay)~~	
	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~	~~Northbound/ Eastbound~~	~~Southbound/ Westbound~~
~~Project-Related Increase in Delay~~				
~~Developer's Proposed Option~~				
~~Frida Kahlo Way~~	~~13~~	~~59~~	~~24~~	~~73~~
~~Ocean Avenue~~	~~66~~	~~39~~	~~58~~	~~100~~
~~Geneva Avenue~~	~~20~~	~~74~~	~~42~~	~~81~~
~~Additional Housing Option~~				
~~Frida Kahlo Way~~	~~16~~	~~72~~	~~41~~	~~83~~
~~Ocean Avenue~~	~~62~~	~~64~~	~~84~~	~~128~~
~~Geneva Avenue~~	~~30~~	~~84~~	~~58~~	~~91~~

~~SOURCE: Kittelson & Associates, Inc. 2018.~~

~~NOTES:~~

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

TABLE 3.B-18
TRANSIT DELAY ANALYSIS

Transit Line	Study Segment	Transit Travel Time		Project-Related Change		Exceeds Four-Minute Threshold?[a]	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
Existing Conditions[b]							
K/T	Jules/Ocean to Balboa Park BART (outbound)	3:30	8:42	—	—	—	—
	San Jose/Geneva to Dorado/Ocean (inbound)	3:28	10:03	—	—	—	—
29	Plymouth/Ocean to Mission/Persia (outbound)	8:01	12:09	—	—	—	—
	Mission/Persia to Plymouth/Ocean (inbound)	7:10	9:55	—	—	—	—
43	Geneva/Howth to Monterey/Foerster[c] (inbound)	4:50[c]	5:07[c]	—	—	—	—
	Gennessee/Monterey to Geneva/Howth[c] (outbound)	4:27[c]	4:46[c]	—	—	—	—
49	Frida Kahlo/City College South to Mission/Persia (outbound)	5:39	10:04	—	—	—	—
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:18	11:25	—	—	—	—
Existing Conditions + Developer's Proposed Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:36	9:40	1:06	0:58	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:07	11:43	0:39	1:40	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:07	13:07	1:06	0:58	No	No
	Mission/Persia to Plymouth/Ocean (inbound)	7:49	10:35	0:39	1:40	No	No
43	Geneva/Howth to Monterey/Foerster[c] (inbound)	5:04[c]	5:33[c]	0:14	0:26	No	No
	Gennessee/Monterey to Geneva/Howth[c] (outbound)	5:37[c]	5:50[c]	1:10	1:04	No	No
49	Frida Kahlo/City College South to Mission/Persia (outbound)	6:45	11:02	1:06	0:58	No	No
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:57	13:05	0:39	1:40	No	No
Existing Conditions + Additional Housing Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:32	10:08	1:02	1:24	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:32	12:11	1:04	2:08	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:03	13:33	1:02	1:24	No	No

Transit Line	Study Segment	Transit Travel Time		Project-Related Change		Exceeds Four-Minute Threshold?[a]	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
	Mission/Persia to Plymouth/Ocean (inbound)	8:14	12:03	1:04	2:08	No	No
43	Geneva/Howth to Monterey/Foerster[c] (inbound)	5:07[c]	6:07[c]	0:17	1:00	No	No
	Gennessee/Monterey to Geneva/Howth[c] (outbound)	5:39[c]	6:07[c]	1:12	1:21	No	No
49	Frida Kahlo/City College South to Mission/Persia (outbound)	6:41	12:28	1:02	1:24	No	No
	Mission/Ocean to Frida Kahlo/City College South (inbound)	8:22	13:33	1:04	2:08	No	No

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] The threshold is calculated as the existing transit travel time plus four minutes.

[b] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

[c] The Transit Travel Time column for existing conditions represents the 43 line between Geneva Avenue/Howth Street and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), with collected transit travel time data along the route segment between Frida Kahlo Way/Geneva Avenue/Ocean Avenue and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), plus the Synchro estimated delay at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The Project-Related Change columns in Table 3.B-18 represent Synchro-estimated increase for the 43 line between Foerster Street/Monterey Boulevard and Geneva Avenue/Howth Street.

Developer's Proposed Option

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of ~~73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 1 minute and 40 seconds along Ocean Avenue in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 6 seconds along Ocean Avenue in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, ~~t~~The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, ~~t~~The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, based on the established

thresholds of significance, the Developer's Proposed Option would result in a ***less-than-significant*** impact related to transit delay.

Additional Housing Option

As shown in Table 3.B-18, vehicle and transit generated by the Additional Housing Option would increase transit delay by a maximum of ~~83 seconds along Frida Kahlo Way, (southbound direction, weekday p.m. peak hour), a maximum of 128 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 91 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 2 minutes and 8 seconds along Ocean Avenue in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 2 seconds along Ocean Avenue in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, t~~T~~he majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Additional Housing Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, t~~T~~he Additional Housing Option would not result in transit delay greater than or equal to four minutes.[6] Therefore, based on the established thresholds of significance, the Additional Housing Option would result in a ***less-than-significant*** impact related to transit delay.

Cumulative Conditions Transit Delay

As discussed on draft SEIR p. 3.B-95, the transit delay contribution from the project, City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the threshold of significance for individual Muni routes. As a result, the proposed project, in combination with cumulative projects, could result in a significant cumulative public transit delay impact. Based on a review of the project-related increase in delay under existing plus project conditions and the potential for increased delay under cumulative conditions, the proposed project options could have a cumulatively considerable contribution to transit impacts, and a significant impact was identified.

Upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution to transit delay for the 49 Van Ness/Mission route in the study area. The additional vehicle traffic contributed by the proposed project would not result in a substantial transit delay to the 49 Van Ness/Mission. As a result, no mitigation is required.

For informational purposes, the project team, in consultation with SFMTA, examined potential improvements to reduce transit travel time. On Ocean Avenue, between Frida Kahlo Way and Howth Avenue, the team identified there could be potential transit time savings to the 49 Van

[6] ~~Ibid.~~

Ness/Mission route by moving the bus stop nearest to City College into the streetcar track lane. This is a policy decision that the SFMTA is currently investigating that wouldn't require a financial commitment from the project sponsor.

The following edits update draft SEIR pp. 3.B-95 to 3.B-98, including **Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay**, to reflect the impact conclusion updates regarding the 49 Van Ness/Mission and transit capital improvements (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> **Mitigation Measure M-C-TR-4**: ~~**Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay**~~. The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall~~ implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay ~~and meet the transit travel time performance standard~~ for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.
>
> ~~**Transit Travel Time Performance Standard**~~**Routes and Study Segments**. ~~Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4.~~ The following routes and study segments ~~shown in Table M-C-TR-4~~ represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.
>
> - K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)
> - K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue
> - 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue
> - 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue
> - 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street
> - 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard

~~TABLE M-C-TR-4~~
~~TRANSIT TRAVEL TIME PERFORMANCE STANDARD~~

~~Transit Line~~	~~Study Segment~~	~~Existing Transit Travel Time[a]~~		~~Performance Standard[b]~~	
		~~A.M. Peak Period~~	~~P.M. Peak Period~~	~~A.M. Peak Period~~	~~P.M. Peak Period~~
~~K/T~~	~~Jules Ave/Ocean Ave to Balboa Park BART~~	~~3:30~~	~~8:42~~	~~7:30~~	~~12:42~~
	~~San Jose Ave/Geneva Ave to Dorado Terr/ Ocean Ave~~	~~3:28~~	~~10:03~~	~~7:28~~	~~11:28~~
~~29~~	~~Plymouth Ave/Ocean Ave to Mission St/ Persia Ave~~	~~8:01~~	~~12:09~~	~~12:01~~	~~16:01~~
	~~Mission St/Persia Ave to Plymouth Ave/ Ocean Ave~~	~~7:10~~	~~9:55~~	~~11:10~~	~~15:10~~
~~43~~	~~Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd~~	~~4:20~~	~~4:37~~	~~8:20~~	~~8:37~~
	~~Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance~~	~~4:16~~	~~4:23~~	~~8:16~~	~~8:23~~
~~49~~	~~Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave~~	~~5:22~~	~~10:04~~	~~9:22~~	~~14:04~~
	~~Mission St/Ocean Ave to Frida Kahlo Way/ CCSF South Entrance~~	~~7:18~~	~~11:25~~	~~11:18~~	~~15:25~~

~~SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.~~

~~NOTES:~~

~~a~~ Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected ~~on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at~~ each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. ~~Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.~~

~~b~~ ~~The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route~~ with headways of less than eight minutes.

~~**Monitoring and Reporting**. The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.~~

~~*Timing*. The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building[7] at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.~~

~~[7] A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.~~

~~The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets it terms for this measure.~~

~~*Collection and Reporting Details.* For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.~~

~~For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair-share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).~~

Implement ~~Fair-Share of~~ Capital Improvement Measures. ~~If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the~~ The project sponsor shall ~~implement~~ contribute funds for the following capital improvement measures that reduce transit travel times. ~~These measures are subject to agency approval and could include:~~

1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue**. The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue**. The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
3. **Bus boarding island on southbound Frida Kahlo Way**. The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.

The cost of these capital improvement measures is $200,000 in 2020 dollars, and shall be considered the project's fair share toward mitigating this significant cumulative impact.

A proportional share of this payment (based on the number of units in the building divided by 1,100) shall be made upon issuance of the first construction document for each project building . This amount shall be increased by consumer price index per year until the date of each payment. The fair share contribution, as documented by SFMTA[8], shall not exceed this amount across all phases. Payment of the fair share contribution levels would mitigate the project's contribution to the cumulative impacts of the estimated transit delay added by full development of the proposed project options, City College facilities master plan and other nearby development.

Commented [SV2]: Because the impact is a future cumulative impact, rather than a project impact, we believe the payments should be made as each building's first construction document is issued, the same date as the TSF and other impact fee payments.

Commented [SV3]: Same comments for Chapter 5.

If SFMTA adopts a strategy to reduce transit travel times along these routes that does not involve signal timing modifications or bus boarding islands, the project's fair share contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed desirable by SFMTA.

1. ~~Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~
2. ~~Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~
3. ~~Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may include off site capital improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~

~~**Term Condition A**: The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~

~~**Term Condition B**: The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~

~~In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness,~~

[8] Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

~~and~~ Implementation of these capital improvement measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. However, given the uncertainty of SFMTA approval ~~of other measures under their jurisdiction,~~ of these measures, and because SFMTA cannot commit funding to these capital improvements, the impact of the proposed project options would remain ***significant and unavoidable with mitigation,*** even with implementation of Mitigation Measure M-C-TR-4.

Significance after Mitigation: Significant and Unavoidable.

Potentially Hazardous Conditions – Transit

The draft SEIR includes an evaluation of potentially hazardous conditions for people accessing transit under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed on draft SEIR p. 3.B-67, under existing conditions, people walking to/from the K/T Ingleside transit boarding island on Ocean Avenue at Lee Avenue were observed to cross the rightmost travel lane to access the boarding island or sidewalk instead of crossing at the crosswalk. People waited for gaps in vehicle and bicycle traffic before crossing the travel lane, and vehicles and bicycles were generally traveling slowly with sufficient gaps in traffic for people to cross. While some of the project-generated transit riders would be expected to use the crosswalk at Lee Avenue to access the boarding island, it is likely that people would continue to cross the rightmost travel lane to access the boarding island.

A number of factors are considered in the evaluation of the proposed project's potential to result in potentially hazardous conditions for people walking to/from the K/T Ingleside boarding island. Such factors include the presence of an existing protected crossing at Lee Avenue, that the project would add a maximum of 132 vehicles during the weekday p.m. peak hour under the Additional Housing Option, and that the anticipated vehicle speeds of project traffic approaching the Lee Avenue intersection to turn right would be less than 15 miles per hour. Based on these considerations, the proposed project options would not create potentially hazardous conditions for people walking to/from the K Ingleside boarding island. Because the proposed project would not result in a significant impact related to conditions for people walking, no mitigation is required.

Geographic Study Area for Transit

One commenter seeks clarification on how the draft SEIR geographic study area for transportation and circulation was developed. The geographic study area analyzed for the proposed project includes the overall vehicular roadway network that residents, employees, and visitors would use in traveling to and from the project site generally within 0.25 miles of the center of the project site. As described in Section 3.B.4, Existing Conditions, on draft SEIR p. 3.B-5, the transportation study area was selected to include elements of the network that:

- Represent access points to the regional highway system (e.g., freeway on- and off-ramps);
- Are located along major street corridors serving the project site (e.g., Ocean Avenue and Frida Kahlo Way); or

- Are located in the immediate vicinity of the project site (e.g., San Ramon Way/Southwood Drive/Plymouth Avenue).

Pertaining to transit, the geographic boundary of the study area includes the closest transit stops to the project site for the relevant Muni lines and includes the intersections and street segments along which project traffic would be most concentrated. Outside the geographic study area, project vehicle traffic would be more dispersed, thereby lessening the potential for impacts.

Mitigation Measures

Comments include recommendations for additional mitigation measures to reduce transit delay. Section 15126.2 of the CEQA Guidelines states that "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment … the EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected." Mitigation measures in the draft SEIR are provided only for impacts found to be significant (CEQA Guidelines section 15126.4). Under CEQA, mitigation measures in an EIR must have an essential nexus (i.e., connection) between the mitigation measure and the significant impact and the mitigation must be "roughly proportional" to the significant impacts of the project (CEQA Guidelines section 15126.4(a)(4)(a) and (b)). Mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines section 15126.4(a)(3)). The draft SEIR adequately and accurately addresses public transit impacts and presents applicable mitigation measures, as appropriate.

As discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, the proposed project options would result in a less-than-significant impact related to transit delay and no mitigation would be required under existing plus project conditions.

As discussed under Impact C-TR-4 on SEIR pp. 3.B-94 to 3.B-99, the proposed project may result in a cumulatively considerable contribution related to transit delay. To reduce the project's considerable contribution, implementation of Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay, was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures (e.g., modifying signal phasing or restricting certain movements for general traffic that delay transit vehicles at locations along given routes) to maintain transit travel times. for each individual transit route within the study area to, within four minutes of existing levels.

While the proposed mitigation measure and the timing of the mitigation measure is appropriate and meets CEQA requirements, the project sponsor worked with SFMTA and planning department staff to identify treatments that could be implemented in the short term to prevent a cumulatively significant contribution and reduce potential for project-related transit delay impacts.

As documented in the revised Mitigation Measure M-C-TR-4 shown on RTC p. 4.C-45, the project applicant would fund design and construction of the following capital improvement measures:

- Modification of the existing traffic signal at Ocean Avenue/Brighton Avenue to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
- Modification of the existing traffic signal at Ocean Avenue/shall to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns. Bus boarding island on southbound Frida Kahlo Way.

As documented in the Transit Delay Analysis and Capital Improvements memorandum included as new SEIR Appendix C4 (and included in RTC Chapter 5), these capital improvements would reduce delay and prevent a cumulatively significant project contribution to cumulative impacts on the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.

As previously discussed on RTC p. 4.C-44, upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution to transit delay for the 49 Van Ness/Mission route in the study area and no mitigation measures are required.

One commenter proposes a series of mitigation measures; responses to each are provided below. The responses are provided for informational purposes, because as described above, feasible project measures were identified for the project's considerable contribution to the significant cumulative transit delay impact. However, the impact remains significant and unavoidable due the uncertainty in the SFMTA adopting such measures.

- **Restrict left turns at the intersection of Ocean Avenue and Brighton Avenue**. Eastbound left turn prohibitions are included as a capital improvement measure in the revised Mitigation Measure M-C-TR-4 to reduce transit delay for routes operating along Ocean Avenue.
- **Install transit signal priority at all traffic lights on Ocean Avenue between San Jose Avenue and Junipero Serra Boulevard and on Geneva Avenue between San Jose Avenue and Ocean Avenue**. Transit signal priority currently exists at traffic signals along Ocean Avenue within the study area. CEQA requires that mitigation measures proposed for a project have a nexus to the physical environmental effect that occurs as a result of the project. The commenter does not provide substantial evidence demonstrating a nexus between the Balboa Reservoir Project and measures proposed at traffic signals outside of the study area.
- **Give Muni lines higher priority at St. Francis Circle and West Portal to improve speed and reliability of the K/T line**. CEQA requires that mitigation measures proposed for a project have a nexus to the physical environmental effect that occurs as a result of the project. Transit operations and any transit delays at these locations and associated delay are outside of the study area and reflect existing conditions. The commenter does not provide substantial evidence demonstrating a nexus between the Balboa Reservoir Project and measures proposed at the St. Francis Circle and West Portal.
- **Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line**. Modifying stops (i.e., extending boarding islands) to accommodate two-car boarding would allow for enhanced passenger boarding and alighting but would not address the more

substantive causes of transit delay (i.e., additional vehicles in the study area) as a result of the project. The proposed project would also not have significant impacts related to potentially hazardous conditions that would necessitate this is a mitigation measure.

- **Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full**. The Whole Foods grocery store on Ocean Avenue is part of the existing condition and is not under the purview of the proposed project.
- **Undergrounding the K Muni line**. This mitigation would represent a significant infrastructure project. The City is currently undertaking a transit corridors study as part of Connect SF.[9] The study will develop and prioritize initial concepts for subways, bus rapid transit lines, and other improvements to create a rapid, reliable transit network. The results of this study is unknown, and, thus, the feasibility of a project that undergrounds the K Muni line is unknown. Further, this sort of mitigation would not be roughly proportional to the project's considerable contribution to a significant cumulative transit delay impact.

Comment TR-5: Loading Impacts

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-OSAWA-3
I-PEDERSON2-12

"Most critically, according to the proposal ***the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue*. This would seem to be wholly inadequate**. Additionally, that single lane on Lee will also be potentially occupied by truck loading activities for Whole Foods and neighboring businesses."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-3*])*

"The Draft should clarify why potential loading impacts caused by Whole Foods' failure to comply with permit requirements are treated as impacts caused by the Balboa Reservoir project. The City could resolve those impacts by simply requiring Whole Foods to comply with existing legal requirements."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-12*])*

Response TR-5: Loading Impacts

One commenter incorrectly characterizes the project's vehicular access points and further states that existing loading operations on Lee Avenue would affect the vehicular inlet to the project.

[9] City and County of San Francisco, ConnectSF, https://connectsf.org/about/components/studies/, accessed March 27, 2020.

Another commenter requests that the draft SEIR clarify why the freight loading impacts identified on Lee Avenue are treated as impacts caused by the proposed project.

Comments regarding specific elements of the project description are addressed in Response PD-2, Project Description, on RTC p. **Error! Bookmark not defined.**.

Project Description Clarification

In addition to Lee Avenue, vehicular access to the project site would also be provided via an access road that would connect to the north end of the project site via Frida Kahlo Way as discussed on draft SEIR p. 2-26. As discussed on draft SEIR p. 2-26 and shown in Figure 2-13a on draft SEIR p. 2-28, the proposed project would include a 10-foot-wide northbound lane and would reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one 10-foot-wide southbound through/right-turn lane and one 10-foot-wide southbound left-turn lane. This change from two to three travel lanes would preclude the continued use of curb space along Lee Avenue for freight loading because trucks stopped for loading would obstruct one of the travel lanes.

Existing Freight Loading on Lee Avenue

Project-related freight loading analyses are typically limited to an evaluation of the effects of project-related loading demand on loading conditions within the study area. However, the proposed project includes the extension of Lee Avenue with resulting changes to the areawide on-street loading supply. Therefore, the analysis looks beyond the project-related loading demand and evaluates secondary effects on areawide loading resulting from proposed streetscape modifications and access to the project site. This analysis of the effect of the proposed project on off-site loading activities is presented under Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91; a brief summary of the discussion is provided below as well.

As discussed under Impact TR-6b, under existing conditions, Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses along Ocean Avenue. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area. The proposed project would thereby reduce the supply of on-street loading available to Whole Foods and nearby land uses, creating a loading deficit, which is determined to result in secondary effects on people bicycling and public transit delay. For these reasons, the draft SEIR identifies a significant and unavoidable impact related to freight loading that is attributable to the project.

As stated on draft SEIR p. 3.B-88, in recognition that the Balboa Reservoir would change the conditions of Lee Avenue, the 1150 Ocean Avenue property owner is working with Whole Foods to internalize loading demand to the extent possible.

Furthermore, as acknowledged on draft SEIR p. 3.B-88 and further restated by the commenter, the planning department has the authority to enforce the 1150 Ocean Avenue conditions of approval. The comments received on the draft SEIR do not present evidence that the analysis is

inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comment TR-6: Cumulative Impacts

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

O-WPA1-2
O-WPA3-6
I-JA9-1

"Second, we will discuss the failure to properly take into consideration the cumulative transportation impacts of the projected increase in City College enrollment. There's an increase, as the DSEIR correctly notes, by I think 26 to 56 percent over the next few years, and it fails to take that into consideration."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-2*])*

"CCSF Enrollment Increase

CCSF has stated that the need for upgraded facilities is based on an approximately 55% increase in anticipated enrollment by 2026 but the cumulative transportation impact discussion is projected to year 2040. The additional enrollment between 2026 and 2040 for CCSF is not discussed. It can be assumed that the annual increase hence forth would be substantially greater than the annual percentage increase used by the Department based on a citywide average. The extraordinary growth in the student enrollment at CCSF as a consequence of free tuition mandates a cumulative analysis that accurately reflects the impacts of the cumulative growth of CCSF on transportation. We believe the DSEIR impact analysis is understated."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-6*])*

"***2040 Cumulative Conditions*** (p. 3.B-91)

The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.

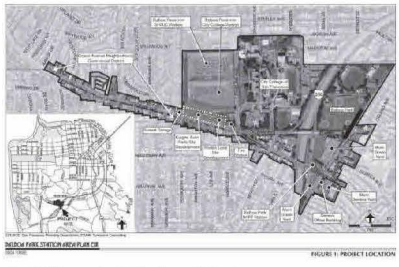
The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough

assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:

The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).



<!--[if !vml]--><!--[endif]-->

The SEIR is deficient in its selection of the parameters of geographic context for analysis."

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-1*])*

Response TR-6: Cumulative Impacts

The comments allege that City College growth impacts are not adequately addressed in the cumulative impact analysis and that the cumulative impact analysis geographic study area is inadequate.

The draft SEIR describes 2040 cumulative conditions on draft SEIR pp. 3.B-55 to 3.B-60 and the cumulative impact analysis on draft SEIR pp. 3.B-91 to 3.B-102. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

The cumulative conditions analysis for transportation topics accounts for active development and transportation projects in the vicinity of the project site in various stages of planning, design, or construction. As explained on draft SEIR p. 3.B-56, the City College Board of Trustees published

its facilities master plan in March 2019 and presented an update at a May 30, 2019, Board of Trustees meeting related to a bond measure that may fund identified projects.[10]

The draft SEIR is consistent with CEQA guidance on level of detail necessary to discuss cumulative impacts. CEQA Guidelines section 15130(b) states that "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness,…"

As of publication of the notice of preparation and the draft SEIR, City College had not conducted CEQA analysis for the proposed projects, and these projects may change or be further refined. Therefore, the cumulative analysis in the draft SEIR and discussed in this document qualitatively assesses impacts of the facilities master plan projects in the study area using the best available information, consistent with CEQA. It is not practical or reasonable for this SEIR to expand the analysis, based on available information. As a result, the cumulative analysis, as described in under Impact C-TR-4 on draft SEIR p. 3.B-56, adequately and accurately identifies cumulative impacts to public transit delay.

The geographic context for cumulative transportation analysis generally includes the transportation network within 0.5 mile of the project site. This radius accounts for the area in which project-related travel would be most concentrated; beyond this area, trips are more dispersed and the likelihood of any impacts that the project could combine with are diminished.

Comment TR-7: Parking

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

O-WPA1-1	I-BARISH3-26	I-KAUFMYN2-3
O-WPA3-1	I-BARISH3-38	I-LOHR-1
O-WPA3-2	I-BERNSTEIN5-6	I-PEDERSON2-5
O-WPA3-3	I-HONG-3	I-PEDERSON1-2
O-WPA3-5		

"Good afternoon. My name is Michael Ahrens. I am President of the Westwood Park Association, Homeowners Association. I am also a member of the Balboa Citizens Advisory Committee, sometimes called the CAC. And thank you for hearing our comments.

On behalf of the Board of Directors of the Westwood Park Association, the neighborhood that is most affected by this whole development, I'm glad to tell you I will be brief. We will put our comments on the DSEIR in writing.

[10] The City College Facilities Bond (Measure A) passed on March 3, 2020.

But I will say this that the DSEIR is severely flawed and we will tell you why in writing.

I will outline, now, only a series of some of the flaws, and you've heard some of the hints of these things from other speakers tonight. First, we will discuss the failure of the DSEIR to accurately address the cumulative secondary parking impacts caused by the loss of existing parking, including the impacts on transit, Lyft and Uber drivers."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-1*])*

"Most significant impact of project is the loss of parking for City College. Although parking not an environmental impact under CEQA, SEIR must include analysis of secondary impacts caused by loss of existing parking, including impacts on public transit, and private ride share. Explain where the secondary impact of elimination of virtually all existing available parking on east and west basins on public transit and local traffic is analyzed and why the impact on SFMTA ridership and capacity analysis are presented in the appendices "for information" only. Secondary impacts related to City College on transit and transit delay are not based on most recent information related to foreseeable FMP projects prior to SEIR publication."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-1*])*

"SEIR doesn't analyze secondary impacts of elimination of parking as part of cumulative impacts on transportation. Non-CEQA parking study by Kittelson anticipates parking shortages caused by project and City College development will lead to increased reliance on public transportation and increase in drivers looking for parking spaces in adjacent residential neighborhoods."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-2*])*

"Many of the streets within Westwood Park provide on-street parking that results in narrowing the effective roadway width and making two-way vehicle traffic difficult. (DSEIR, p. 6-34) This potentially hazardous condition would be exacerbated by additional vehicles looking for parking due to the shortage created by cumulative development. This is a potentially significant secondary transportation impact that is not adequately addressed in the DSEIR."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-3*])*

"The developer has stated on its website that there will be a public garage on the site "sized to meet City College demand". The number and location of the replacement parking spaces should be discussed as should the elimination of the off-street parking spaces from the CCSF Master Plan development."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-5*])*

- There is an aerial analysis of parking lot volumes by time of day. But there is no assessment of the current on-street parking supply. It is known from other campuses and from parking lots serving rail transit like Bart and Cal Train or from light rail in other cities that campuses and large developments put pressure on parking supply, particularly when TOD seeks to provide less parking to support alternative mode choice and to lower development costs. The scoping section has no assessments of the interactive impacts of the college, new apartments and regional parking supply/demand on neighborhood parking conditions post-Development."

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-26*])*

"***The DSEIR must consider the impact of reduced parking without first putting viable transportation options in place***

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

The goal of increasing ridership levels on the nearby public transportation services is laudable but not realistic. Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College."

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-38*])*

"5) The question of having a shuttle provided for City College students and others needing access for that last mile from the BART station has been raised repeatedly at public meetings, such as the Balboa Reservoir CAC. The idea has consistently met with resistance. It's not considered to be a bad idea per se, but it appears to be a financial challenge. Representatives from the City and from the developer have dutifully written the suggestion on white boards but have never embraced it or advocated it. YET THERE HAS TO BE MITIGATION FOR THE IMPACTS ON THE EXISTING CONDITION OF ESSENTIAL PARKING FOR STUDENTS AND FACULTY — for parking which may become unavailable due to a housing development. If there is a development, there will be impacts and consequences which can't just be ignored."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-6*])*

"2. We need to address the parking for the college."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-3*])*

"The Draft SEIR speculates that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day…" The assumption that those students and contingent faculty will transition to public transportation services is not realistic as both MUNI and BART have capacity issues. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate the already unreliable service."

*(Wynd Kaufmyn, Email, September 22, 2019 [*I-KAUFMYN2-3*])*

"I am shocked that the report does not take into account the need for parking at CCSF. There are no dorms at City College. Everyone needs transportation to get there. Muni service is inadequate, especially for night classes. Students and teachers need to be able to park. The loss of this much parking will be devastating to City College."

*(Janet Lohr, Email, August 10, 2019 [*I-LOHR-1*])*

"B. The Draft fails to identify and evaluate the environmental impacts of the proposed public parking garage.

The Draft's assertion that the public parking garage included in the Developer's Proposed Option will not have any environmental impacts because it is replacing parking that already exists is fundamentally flawed.

According to the City College of San Francisco Transportation Demand Management (TDM) and Parking Plan (March 15, 2019), City College currently has excess parking even during the peak parking demand period of the first week of each semester. It has almost 1,000 excess parking spaces on typical semester days. It has an excess supply even though City College provides parking for free to its employees and at very low cost to its students ($40 per semester, $20 per semester for those receiving financial aid, or $3 for a daily pass).

In light of its glut of free or low-cost parking, it is unsurprising that City College has very high rates of commuting by solo drivers. 66 percent of City College employees drive alone to the Ocean campus. This is almost double the citywide average of 34% (Metropolitan Transportation Commission data for 2018). Similarly, only 5 percent of City College employees walk or bike to the Ocean campus in comparison to the citywide average of 10%, even though a substantial portion of City College employees and students live within three miles of the Ocean campus. A

lower percentage of students drive alone to campus (33%), but the TDM and Parking Management Plan concludes that student drivers are especially likely to switch modes of transportation if parking is restricted or becomes more expensive.

Projecting into the future, assuming 25% growth in student enrollment, the TDM and Parking Management Plan projects that a robust TDM program would be sufficient to avoid any parking shortfall on a typical semester day even if the Balboa Reservoir is developed without any replacement parking. If the Performing Arts and Education Center (PAEC) is constructed on an existing City College-owned parking lot, there might be unserved parking demand of up to 415 spaces on a typical semester day, but that assumes no shift in parking demand due to limited supply. According to surveys of employees and students, up to 60% of drivers are likely to shift modes if parking becomes more difficult to obtain. Adding that shift in demand, the unserved parking demand if the Balboa Reservoir is developed without replacement parking, the PAEC is constructed, and enrollment increases by 25% is only 166 spaces.

The Draft has no discussion whatsoever about how construction of a 750-space public parking garage would affect parking demand or the effectiveness of City College's TDM program. Given that the availability of parking encourages more people to drive, the Draft should be revised to address how the proposed public parking garage is likely to result in more VMT and GHG emissions than if it weren't included in the project.

The Draft is also entirely silent about the rationale for the size of the public parking garage. Even if both the Balboa Reservoir project and the PAEC are constructed and the student body increases by 25%, the unserved parking demand on a typical semester day (either 415 spaces or 166 spaces, depending on how supply constraints affect demand) would be far less than 750 spaces if City College implements a robust TDM program. Given that the peak parking demand during the first week of each semester occurs only about 20 hours each year, the peak parking demand hardly seems a plausible rationale for the size of the garage. The only remaining rationale would appear to be a desire to perpetuate current commute patterns and parking demands despite the VMT and GHG emissions that those generate. The Draft should be revised to explain the reason for the size of the proposed public parking garage, the environmental impacts of a garage of that size (e.g., increased VMT and GHG emissions), and whether those environmental impacts could be reduced by shrinking or eliminating the public parking garage."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-5*])*

"To reduce the amount of housing would increase pressure on housing in areas that are more automobile dependent and have more extreme climate. To provide more public parking would undercut efforts to address climate change by reducing automobile use.

That said, this draft fails to evaluate how the developer's proposed public parking garage would undercut City College's efforts to reduce automobile use. The College's 2019 Transportation Demand Management and Parking Plan concludes that TDM measures would be sufficient to address the loss of parking spaces caused by this project. The only exception will be during a few

hours of the first week of each semester. Even then, the shortfall would be less than one-third of the 750 spaces proposed in the public parking garage.

There is, therefore, no need for such a large public parking garage. It would undercut the City's and the College's efforts to respond to the climate crisis by reducing automobile use."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [*I-PEDERSON1-2*])*

Response TR-7: Parking

The comments state that the draft SEIR does not adequately analyze the primary and secondary impacts of parking, and that the draft SEIR does adequately analyze the impacts of the up to 750-space public parking garage.

The draft SEIR covers the topic of parking on draft SEIR pp. 3.A-3 and 3.B-31 and draft SEIR Appendix B, Section E.14, on p. B-87. A discussion of the effect of construction of a public parking garage with up to 750 vehicle parking spaces on parking demand and the City College sustainability plan is provided on draft SEIR Appendix B, p. B-90. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding project travel demand and the project analysis approach to TNCs as they relate to the proposed project are addressed in Response TR-2, Travel Demand, on RTC pp. 4.C-6 and 4.C-10. Comments regarding transit delay associated with project vehicle trips are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-33. Comments regarding the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55. Comments regarding vehicle congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71.

The response to parking comments is organized by the following subtopics:

- Approach to Analysis
- Parking Supply and Utilization

Approach to Analysis

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area, and therefore parking is not an environmental impact for the purposes of CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the SEIR presents an analysis of secondary environmental impacts of potential parking shortages as related to City College in draft SEIR Appendix B on p. B-87. For informational purposes, a discussion of existing and project parking supply and demand within the site and within the neighborhood, is provided on RTC Attachment 3, pp. 1 to 3.

Parking Supply and Utilization

As discussed on draft SEIR Appendix B p. B-90, under the Developer's Proposed Option, up to 750 public parking spaces would be constructed near the southern end of the project site or at the northern end of the project site under Variant 2. Alternatively, public parking spaces could be provided in dedicated public parking areas within several of the proposed residential garages. Given that the proposed parking garage would replace an existing 1,007-space surface parking lot, the project would reduce the amount of parking available on site by a total of at least 257 parking spaces. Based on the parking supply and utilization data collected and provided on draft SEIR Appendix C1, p. 12, the east basin parking lot would be able to accommodate the combined number of vehicles in both the project site and east basin during most periods throughout the weekday, with the exception of the peak period of demand during which there would be a maximum shortfall of 239 spaces. This shortfall would be accommodated within the proposed public parking spaces on the site under the Developer's Proposed Option. As discussed on draft SEIR Section 3.A.6, Approach to Cumulative Impact Analysis, p. 3.A-8, the cumulative conditions scenario assumes construction of projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan", which include potential development on the east basin parking lot.

One commenter asserts that the analysis of secondary effects related to the up to 750 public parking spaces is inadequate and argues that the secondary effects would be greater than the effects of a version of the project without public parking. The analysis of secondary impacts related to parking, as with other environmental analysis topics, compares the proposed project and project variants to existing conditions and also evaluates whether the proposed project and variants would be in conflict with plans and policies adopted for the purpose of mitigating an environmental effect. No significant impacts were identified and thus no alternative garage sizes are necessary to explore.

Further, the VMT impact analysis on pp. 3.B-79 and 80 also found less-than significant impacts for the proposed project and public parking garage. As stated on p. 3.B-80, this conclusion was because, in part, the public parking garage "would replace an existing facility and would not increase the amount of parking available." The discussion above compares effects relative to existing conditions. A discussion of whether the proposed project and variant would conflict with plans and policies adopted for the purpose of mitigating an environmental effect is discussed below, following the text change.

A typo was identified on draft SEIR p. 3.B-79. The last sentence on draft SEIR p. 3.B-79 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in <u>double underline</u>):

> The Developer's Proposed Option would construct a<u>n up to</u> ~~650~~<u>750</u>-space public parking garage to partially replace the existing 1,007-space surface parking lot on the project site.

As discussed on draft SEIR Appendix B, p. B-90, the City College Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. Studies show that the removal of parking would likely cause some drivers to shift to another mode of travel. The study cited in footnote 131 on draft SEIR

Appendix B, p. B-90, and included in the project's administrative record: City and County of San Francisco, *Transportation Demand Management Technical Justification*, June 2016, references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit . Additionally, this document summarizes research conducted in San Francisco that found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that provide more off-street vehicular parking.

For informational purposes, a discussion of existing and with project parking supply and demand is provided starting on RTC Attachment 3, pp. 1 to 3. As presented in RTC Attachment 3, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). During the weekday midday peak hour of parking demand, assuming parking was available only at the East Basin (Upper Lot), there would be a shortfall of up to 239 parking spaces. There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during any given time period (a.m., midday, and p.m.). Therefore, the potential parking shortfall for City College students could be accommodated within available on-street parking spaces within the study area without construction of a public parking garage on the project site. The projected parking use generated by the Developer's Proposed Option could be met within available on-site parking spaces during all time periods of the day. With the Additional Housing Option, there would be an approximately 101-space parking shortfall during the overnight period.

One commenter proposes a shuttle to address first- and last-mile connectivity between the proposed project site and the Balboa BART station. The provision of a shuttle would not reduce the project's significant and unavoidable transportation impacts and is therefore, not a CEQA issue. RTC Attachment 3 included analysis of potential shuttle operations and feasibility, indicating that a shuttle would provide limited utility not already provided by Muni service for people traveling to and from the project.[11]

As described in RTC Chapter 5, Draft SEIR Revisions, the Balboa Reservoir project sponsor may fund a portion of a study addressing the potential City College garage on the east basin, if the college decides to consider pursuing such a project.

Comment TR-8: Vehicle Traffic Congestion and Associated Impacts

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

A-CALTRANS-2	I-HONG-4	I-MUHLHEIM-7
I-AISSA-1	I-JA3-4	I-OSAWA-6

[11] Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019, http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf

I-BARISH3-24	I-JA8-1	I-SIMON-6
I-BERNSTEIN5-4	I-MUELLER1-4	I-TARQUINO-6
I-COLLINS3-7	I-MUHLHEIM-3	I-ZELTZER-5
I-EVANS2-5	I-MUHLHEIM-5	
I-HANSON4-3		

"**Construction-Related Impacts**

Potential impacts to the I-280 from project-related temporary access points should be analyzed. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: https://dot.ca.gov/programs/traffico~erations/transportation-permits."

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [*A-CALTRANS-2*])*

"We are already dealing with tremendous congestion on a daily basis. Our street [Plymouth] cannot tolerate the additional traffic that will be created by the plan proposed. Parking is impossible for existing residents now. Please do not allow the proposed opening of San Ramon!"

*(Sharon Aissa, Letter, September 13, 2019 [*I-AISSA-1*])*

"Transportation Demand Management (TDM) Plan (-p. 3B-38)

The Project will significantly impact transportation and traffic in the neighborhood. The EIR must include a comprehensive traffic study of trip generation and parking supply, and evaluate the indirect and cumulative impact of the Project on transportation and traffic impacts on the people living in and traveling to both the Project as well as City College of San Francisco. The DSEIR must also consider these substantial impacts on lower income students who likely reside further away and must use automobiles. This study must also include the impact of increased traffic on congestion and parking in the neighborhoods impacted by the Project, and propose feasible alternative to these impacts."

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-24*])*

"4) Also related to access is further traffic congestion. Circulation and congestion would be worse than they are today because of the impact of the approximately 2500-3000 additional people, the access to the development through only to entrances, one coinciding with the road just south of Riordan High School—unless this is reconfigured—and the other via the extension of Lee Avenue. The interference of a through Lee Street extension with the operations of Whole Foods egress could become quite a serious problem. The extra cars and people from the development will likely make traffic on Ocean Avenue considerably worse."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-4*])*

"16. The effects on the neighborhood would be horrifying and ridiculous. As written Frida Kahlo Way is jammed on school days and nights now. Add thousands of residents (who will lack infrastructure, decent grocery and other shopping- prepare for tons of catering vans, Amazon vans, also Uber/Lyft as parking is limited on development). You will see, as a firefighter friend points out, that the firefighters and EMS or SFPD can't reach the housing development let alone reach other blocks nearby. They can't FLY over traffic that's jammed. Please don't do this to us."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-7*])*

"**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." To be updated per conversation with SFMTA.

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-5*])*

"The current plan for the proposed development will access Lee Avenue, which serves as a route to Ocean Avenue. Within 100 feet of Ocean Avenue, traffic on Lee Avenue will pass the outlet of the parking lot for Whole Foods. Data from Kittleson's queue analysis and intersection total delay analysis on pages 10-13 in Appendix C of the SEIR shows The SEIR states:

During the weekday p.m. peak hour, the greatest increase in total delay would occur for southbound movements on Lee Avenue, increasing by 91.3 seconds. This increase in delay would not directly impact transit, as the southbound approach on Lee Avenue is not a transit route.

The data collected by Kittelson however took place on January 31, 2018 which is at least 6 months before Whole Foods began offering 2 hour free delivery to Amazon Prime customers and the traffic passing through the Whole Foods parking lot increased, especially during the evening

rush hour which showed 100 cars traveling South on Lee Avenue—presumably cars leaving Whole Foods parking lot since there are no residences or through ways currently connected to Lee Avenue. Now however, periodically throughout the day and week, traffic is so bad in the Whole Food lot that employees must direct traffic using walkie-talkies. Even with this extra help at times there is not enough parking to accommodate the cars trying to park, and so the cars back up at the entrance all the way out to Ocean Avenue. Because there is a Muni stop near the entrance to Whole Foods in the left lane, the cars in the right lane cannot pass and so all traffic stops in the right lane until the traffic inside the parking lot begins to move.

The entrance to Whole Foods is one half block from Lee Avenue. Because no traffic comes from residences on Lee Avenue now the cars leaving the Whole Foods parking lot are only delayed by their own burgeoning numbers, but if traffic is added from the proposed Reservoir development this parking lot traffic will have to wait for the reservoir traffic to pass in order to leave the parking lot and create space for more cars waiting out on Ocean avenue (headed south) to turn right into the parking lot. The queue on Lee Avenue as shown in the DSEIR completely blocks the driveway from the parking lot.

This will back up the cars further attempting to enter the Whole Foods lot a half block away and so this combination will create its own gridlock and subsequent nuisance.

In fact it will be beyond a nuisance because when the anticipated 91.3 second delay happens on Lee Avenue South, the cars heading into and out of Whole Foods parking lot will be stuck and create a blockage which will indeed affect the transit system behind it."

*(Christine Hanson, Email, September 23, 2019 [*I-HANSON4-3*])*

"3. I'm concerned with the traffic exiting this site on to Ocean Ave. and how it may impact this retail section."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-4*])*

From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

*(Alvin Ja, Email, August 8, 2019 [*I-JA2-2*])*

"3.A.2 Overall Approach to Impact Analysis

As a subsequent EIR to the PEIR certified in 2008, this SEIR, including the initial study, identifies and considers all mitigation measures that were identified in the PEIR and determines their applicability to the currently proposed project.

Considering mitigation measures contained in the PEIR is insufficient. The Initial Study and DEIR has failed to identify and consider the PEIR rejection of the Lee Extension that had been proposed by CCSF.

The fact that the PEIR had rejected the Lee Extension has direct relevance and "applicability to the currently proposed project."

Here's what the PEIR says about the Lee Extension (westbound Ocean onto northbound Lee into Reservoir):

Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress on Lee Avenue.

It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In

addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.

To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir

development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at Lee Avenue.

Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan.

3.B.3 Summary of Balboa Park Station Area Plan PEIR

Transportation Section

Balboa Park Station Area Plan PEIR Impacts and Mitigation

Measures

Program-Level Impacts

Transit

Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.

The BPS Area Plan PEIR contains a comprehensive analysis of the Lee Extension. The Lee Extension analysis is directly applicable to the Balboa Reservoir Project.

Crucially, all Lee Extension options were eliminated from the BPS Area Plan.

Although the Lee Extension is referenced in the "Traffic" Section, the "Transit" Section only mentions Ocean/Geneva/Kahlo and the two Geneva/I-280 on/ off ramps.

It is only with willful disregard for objectivity that the BPS Final EIR's rejection of a Lee Extension has not been incorporated into the Reservoir SEIR and Initial Study as it relates to transit delay.

The Kittelson Memorandum pales in comparison to the analysis that had been contained in the BPS PEIR.

The Lee Extension analysis contained in the PEIR cannot be legitimately omitted from Transit Delay analysis. Thus the SEIR/Initial Study is defective and inadequate."

*(Alvin Ja, Email, September 13, 2019 [*I-JA3-4*])*

"**Operation** (p. 3.B-35)

Approach to Analysis

Roadway Network Features (p. 3.B-36)

Circulation changes implemented by the proposed project include the extension of Lee Avenue…

The operational impact analysis includes the following significance criteria:

<!--[if !supportLists]-->· <!--[endif]-->*Cause substantial additional VMT or substantially inducing additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;…*

<!--[if !supportLists]-->· <!--[endif]-->*Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit*

Despite the fact that the Lee Extension would induce "additional automobile travel by increasing physical roadway capacity in a congested area" and would substantially delay many MUNI lines on Ocean Avenue, no mention is made here regarding impacts on these significance criteria. (And as mentioned before, the PEIR had already rejected a Lee Extension from being included in the BPS program-level FEIR because its adverse impact on transit. The PEIR's discussion regarding the Lee Extension is brought up in 3.B.3. Yet, its relevance and applicability to the Reservoir Project's Lee Extension is omitted.)"

*(Alvin Ja, Email, September 7, 2019 [*I-JA8-1*])*

"Plus, traffic gridlock in an area, already at the most negative level possible, would with a large additional population pose tremendous problems (and dangers!) to both the college and all of the surrounding neighborhoods. The area is not "transit rich", it is 'transit gridlocked'."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER1-4*])*

"<!--[if !supportLists]--> 3. <!--[endif]-->Here are some areas where I find mitigation will be necessary if based on the already overburdened streets and transit options. It is my fear that in many of these cases, satisfactory mitigation is not feasible.

<!--[if !supportLists]-->· <!--[endif]-->Over the last year my commute has frequently gone from 35 minutes to over an hour.

<!--[if !supportLists]-->· <!--[endif]-->Heading to CCSF I can take the Muni K directly from Castro and Market to Lee Avenue station or transfer at Forrest Hill to the 43.

Unfortunately K cars frequently stop for up to 10 minutes at St Francis Circle to reconfigure and even during non peak times, the ride down Ocean Avenue is very slow. Also there are frequent

delays in the tunnel. Busline 43 has its own set of issues. Scheduled busses frequently fall out. Much of the route is on curvy or very narrow streets and traffic on Frida Kahlo way can pack up to the point that walking from the Judson/Kahlo stop to the Bookstore stop can be faster than staying on the bus."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-3*])*

"<!--[if !supportLists]-->· <!--[endif]-->When I walk past Lee Ave, it is clear to this non-professional eye that entry to the housing project via Lee Ave. extension will be a disaster. Traffic and loading in and out of the Parking lot off Lee is already problematic. Vehicular entry onto Ocean Ave. off neighboring side streets is also already difficult."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-5*])*

"To date there is not a plan in place to provide mitigation for exacerbated traffic and transportation conditions that will be caused by construction of a project that is many times denser that the surrounding neighborhoods."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-7*])*

"There will also be significant impact to freeway traffic. Even today, the off-ramp from NB280 to Geneva is frequently backed up well onto the main traffic of NB280, resulting in extremely hazardous traffic conditions. It is noted that most of the exiting cars are turning east onto Geneva away from the proposal site, as this ramp is the primary access to the Outer Mission and Cow Palace areas – with the project site added as a destination in the westbound direction from the ramp, one can expect a bad situation to grow much worse. The off-ramp from SB280 to Ocean is likewise backed up onto the freeway proper during most commute hours."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-6*])*

"In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways.

From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-6*])*

"2. It is already almost impossible to get home to Westwood Park, get into City College Ocean Campus as the traffic is already impacted by new growth. There is usually stopped traffic, sometimes backed up onto the 280 south bound freeway going to the Ocean Ave. exit. With any more than the original 425 -500 units, it will be a more dangerous and frustrating situation."

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-6*])*

"So, we say to the public of San Francisco, stop this corrupt, rotten development, the more gridlock on Ocean Avenue. There's no way of getting mass transportation out there. The MTA has said they can't provide the extension of the Ocean Avenue, which means there will be gridlock. There is gridlock now, and you want to encourage more gridlock for the people of San Francisco."

*(Steve Zeltzer, CPC Hearing, September 12, 2019 [*I-ZELTZER-5*])*

Response TR-8: Vehicle Traffic Congestion and Associated Impacts

The comments discuss existing traffic congestion and opine on the primary and secondary effects that vehicles trips associated with the construction and operation of the Balboa Reservoir Project will have on traffic congestion.

Many comments regarding vehicle traffic congestion identify secondary issues as a result of traffic congestion such as freight loading or emergency access impacts.

The draft SEIR concluded the proposed project would have a less-than-significant transportation impact related to construction; potentially hazardous conditions for walking, bicycling, driving, and public transit operations; accessibility or emergency vehicle access; and freight loading within the site, and no mitigation measures would be required for these topics. The draft SEIR concludes that the proposed project would have a significant and unavoidable impact related to off-site freight loading on Lee Avenue between Ocean Avenue and the project site. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding existing conditions are addressed in Response TR-1: Existing Conditions, on RTC p. 4.C-2. Comments regarding the project's contribution to transit delay are addressed in Response TR-4, Transit Impacts, on RTC pp. 4.C-33 and 4.C-33. Comments regarding the impact to loading conditions associated with the Lee Avenue extension are addressed in Response TR-5, Loading Impacts, on RTC p. 4.C-52. Comments regarding parking conditions and the secondary effects of project parking are addressed in Response TR-7, Parking, on RTC pp. 4.C-61 and 4.C-61. Comments regarding the relationship between program and subsequent EIRs are addressed in

Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. **Error! Bookmark not defined.**.

The response to vehicle traffic congestion and associated impacts topics is organized by the following subtopics:

- Existing Conditions
- Automobile Delay and Parking
- Lee Avenue Extension
- City College Loop Analysis
- Emergency Vehicle Access
- Construction-Related Transportation Traffic

Existing Conditions

The draft SEIR adequately and accurately described existing conditions surrounding the project site. Further, CEQA requires analysis of the significant effects of the proposed project on the environment. This includes the significant environmental effects the project might cause or risk exacerbating.[12] A project cannot be required under CEQA to mitigate conditions that the project does not connect to or is not roughly proportional to the impact of the project.[13] Thus, the proposed project can't through CEQA mitigate existing conditions or existing system deficiencies unless it exacerbates such existing significantly environmentally affected conditions.

Automobile Delay and Parking

Automobile delay and parking shall not be considered as significant impacts on the environment pursuant to CEQA. As discussed on draft SEIR p. 3.B-25, the San Francisco Planning Commission adopted Resolution No. 19579 on March 3, 2016, removed automobile delay (traffic congestion), as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as significant impact on the environment pursuant to CEQA. Further, CEQA removed automobile delay statewide in December 2018.[14]

Comments include mention of project-related congestion and possible hazards. Potential project-related transit delay is discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, and Response TR-4: Transit Impacts, on RTC p. 4.C-33.

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[12] CCR Title 14 Section 15126.2.
[13] CCR Title 14 Section 15126.4.
[14] Public Resources Code section 21099(b)(2) states: "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." The secretary certified the guidelines in December 2018.

With respect to potential vehicle hazards, the draft SEIR finds that the proposed project would not result in potentially hazardous conditions to people driving, walking, bicycling, or public transit operations. This finding is discussed in Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area; therefore, parking shall not be considered a significant impact on the environment pursuant to CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the secondary environmental impacts related to City College are addressed in draft SEIR Appendix B, Section E.14, Public Services. For informational purposes, a description of existing and with project parking conditions is provided on RTC Attachment 3, pp. 1 to 3.

Regarding the comment that the draft SEIR must evaluate impacts on lower-income City College students who likely reside further away and must use automobiles, the commenter does not provide evidence of this general statement. Further, socioeconomic effects are generally beyond the scope of the CEQA. An exception is if a link can be established between anticipated socioeconomic effects of a proposed action and adverse ***physical environmental impact*** [emphasis added] (CEQA Guidelines section 15131(a), CEQA section 21082.2). The comment does not provide evidence showing such a link.

Lee Avenue Extension

Project vehicle trip assignment at the Ocean Avenue/Lee Avenue intersection is illustrated in Figure 3.B-6a and Figure 3.B-7a on draft SEIR pp. 3.B-47 and 3.B-49, respectively. The effect of project-generated vehicle traffic along Lee Avenue and Ocean Avenue/Lee Avenue intersection operations are discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed in this section, proposed project would not increase the frequency, duration, or length of queues along westbound Ocean Avenue such that it would increase instances of blockages at the City College Terminal or fire department station 15, or substantially delay transit. Intersection operations analysis is summarized in draft SEIR Appendix C2, Transit Assessment Memorandum, and Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

The project proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would increase the space for vehicle queue storage on the southbound approach, thereby increasing the capacity of the intersection on the southbound approach and reducing the southbound queue lengths under project conditions relative to existing conditions. Proposed additional loading spaces along Ocean Avenue would alleviate the associated reduction in loading spaces along Lee Avenue with this proposed reconfiguration.

Discussion of the impact to loading conditions associated with the Lee Avenue extension are included in the following locations: Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91, Impact C-

TR-6b, on draft SEIR pp. 3.B-101 to 3.B-102, and Response TR-5, Loading Impacts, on RTC p. 4.C-52.

The PEIR's conclusion regarding Lee Avenue is relevant to the proposed project in that CEQA allows subsequent project-level analyses to tier off of previous general-level analysis. The PEIR analysis is at an area plan level, with different details than are available for the present project-level analysis. For example, the draft SEIR analysis uses more recent traffic counts to reflect existing baseline conditions than the PEIR, which was certified in 2009. Using newer and more relevant information allows for more accurate analysis and is consistent with the tiering approach for environmental analysis. Decision-makers did not make any approval or take any action that prevented future extensions of Lee Avenue when they certified the PEIR and adopted the area plan.

The commenter incorrectly states that data collection took place on January 31, 2018 prior to Whole Foods offering two-hour free delivery to Amazon Prime customers. Intersection turning movement counts at Ocean Avenue/Brighton Avenue, the ingress to the Whole Foods parking lot, were collected on Tuesday August 28, 2018 (see draft SEIR Appendix C2, pp. 32–33 of Attachment A, Intersection Turning Movement Volumes). Loading data along Lee Avenue was collected on Tuesday March 26, 2019 (see draft SEIR Appendix C3).

Existing freight loading conditions are discussed on draft SEIR p. 3.B-27, and the effect of project-generated vehicle traffic on Whole Foods operations (including freight loading and garage egress) is discussed under Impact TR-6b on draft SEIR pp. 3.B-85 to 3.B-91. As discussed in these sections, under existing conditions Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading supply to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses.

Based on field observations, the existing freight loading operations at Whole Foods do not fully adhere to the measures outlined in the 1150 Ocean Avenue project conditions of approval that requires Whole Foods to utilize the off-street area for all loading activity. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area for passengers and freight deliveries. The project also proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses and increase vehicle storage on the southbound approach. As stated on draft SEIR p. 3.B-90, the off-site loading impact of the proposed project would be significant and unavoidable.

City College Loop Analysis

Regarding the comments on the City College Loop analysis that no delay would be generated and that a nuisance will be generated around the Whole Foods parking lot causing delay, transit delay is considered for potential significant impacts on the environment and are evaluated for potential impacts. As further explained in Impact TR-4 on SEIR pp. 3.B-73 to 3.B-79, the proposed

project would not cause significant transit delays, but as described in Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, may contribute to transit delays in the cumulative condition.

The City College Loop (also referred to as City College Terminal) analysis is presented on draft SEIR Appendix C2, pp. 7 to 13. The evaluation assesses the change in queue lengths at Ocean Avenue/Lee Avenue and Ocean Avenue/Frida Kahlo Way/Geneva Avenue and potential for queues to spillback and block transit vehicle access or egress to the terminal. As discussed in this analysis, the increase in queue lengths would not result in queue spillback such that access/egress to the terminal would be blocked. The intersection operations analysis was performed using Synchro software and conducted using the planning department's Transportation Impact Analysis Guidelines for Synchro Intersection LOS Analysis. The Synchro model was calibrated to existing conditions based on observations conducted in the field. The signal timing cards were provided by SFMTA, and the analysis results and Synchro inputs and assumptions, including signal timing coordination and optimization, were reviewed by the department and SFMTA.

Emergency Vehicle Access

A discussion of emergency vehicle access is provided under Impact TR-3 on draft SEIR pp. 3.B-71 to 3.B-73. The nearest fire department station (station 15) is located approximately 350 feet east of the Ocean Avenue/Lee Avenue intersection. As discussed in this section, under existing conditions, vehicle queues were observed to occasionally partially block the fire station driveway. With the addition of vehicle trips, the proposed project would not be expected to increase the frequency or duration of vehicles blocking the fire department station 15 entrance or result in inadequate emergency access. Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

Construction-Related Transportation Traffic

Construction-related transportation impacts are analyzed under Impact TR-1 starting on draft SEIR p. 3.B-60. As stated on draft SEIR p. 3.B-64, construction activities would be conducted in accordance with the public works code, public works department orders, and the blue book, as applicable, to minimize the potential for hazardous conditions and to ensure safe travel in and around the site. At this time, it is not anticipated that the project would require movement of oversized or excessive load vehicles. However, should t project work require movement of oversized or excessive load vehicles on state roadways, the project sponsor would obtain a transportation permit from Caltrans.

Section 2.I.1, State and Regional Agencies on SEIR p. 2-50 is revised as follows:

<u>California Department of Transportation</u>

- <u>Transportation permit for oversized or excessive load vehicles</u>

Comment TR-9: General Comments

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-COLLINS3-3
I-GOODMAN-1
I-OSAWA-1

"4. Frida Kahlo/ Phelan is a one way street, which like many regular streets in our city, such as Bernal Cut or Teresita, connect two parts of town. Our city not being flat, doesn't have a lot of rectangular grid, which means that one street is the one direction to get from one neighborhood to another.

5. No one wants to have to depend on cars! However we depend on reasonable, viable, practical alternatives. Muni can be a mess and too many buses zoom by at rush hour. "Road diets" converting two lanes down to one, create MORE traffic jams that confuse desperate motorists stuck in traffic, filling up crosswalks, endangering pedestrians and cyclists. You'd punish the wrong people and create angry cross traffic that can't move, and more calamityies

6. Buses are full of wonderful environmentally conscience non drivers who also get stuck in horrid traffic. Don't punish them!"

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-3*])*

"My concerns have always focused on the concerns about capacity, and if we are really seeing significant transit infrastructural planning to deal with the capacity concerns of growth and growth population impacts including traffic, pedestrian, and multi-modal concerns. Safety is also another major concern due to the concerns of schools and traffic injuries in and around the Balboa Park Station area."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-1*])*

"The SEIR acknowledges that for all options there will be 'significant and unavoidable negative impact to traffic that cannot be mitigated'. While this statement is diluted in the SEIR by other boilerplate environmental analyses, and while the CEQA guidelines have unfortunately replaced 'automotive delay' with a less-meaningful 'vehicular miles traveled' (VMT) metric, it is undoubtedly the greatest single impact to the environment and to the safety of the neighborhood of the proposed site."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-1*])*

Response TR-9: General Comments

The comments disagree with or mistakenly describe the draft SEIR's findings, state there is a need to redesign the area as a transit first corridor which minimizes pedestrian injuries, discuss existing conditions on Frida Kahlo and within the project study area, and express concern regarding transit capacity.

Comments regarding transit impacts are addressed under Response TR-4, Transit Impacts, on RTC pp. 4.C-33 to 4.C-33. Comments regarding automobile delay (traffic) and its evaluation in the SEIR are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-72.

The response to general transportation comments is organized by the following subtopics:

- Draft SEIR Analysis and Findings
- Redesign of Roadways Within and Nearby to Balboa Station Area Plan
- Existing Conditions
- Transit Capacity

Draft SEIR Analysis and Findings

One commenter states the draft SEIR identified the project would have, "significant and unavoidable negative impact to traffic that cannot be mitigated." Automobile delay (traffic), by itself, is not a significant impact on the environment pursuant to CEQA (for more information, refer to Response TR-7, Parking, on RTC p. 4.C-61). The draft SEIR finds significant and unavoidable project-level and cumulative impacts related to freight loading operations on Lee Avenue and a significant and unavoidable cumulative impact to transit. The draft SEIR found all other transportation impacts to be less than significant.

Regarding traffic and for informational purposes, a discussion of existing and with project vehicle operations and delay is provided in RTC Attachment 3.

Redesign of Roadways Within and Nearby to Balboa Station Area Plan

An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. The draft SEIR concludes that the project would not generate activities that would create potentially hazardous conditions for people walking, bicycling, driving or public transit operations, and that impacts of the proposed project would be less than significant.

Existing Conditions

The draft SEIR describes local roadways on p. 3.B-8. The existing plus project impact evaluation is presented in the draft SEIR on pp. 3.B-60 to 3.B-91. The 2040 cumulative conditions impact evaluation is presented in the draft SEIR on pp. 3.B-91 to 3.B-102. The effect of the proposed project options on transit are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant

impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR. One comment incorrectly states that Frida Kahlo Way is a one-way street. As shown in draft SEIR Table 3.B-1, Roadway Facilities in the Study Area, Frida Kahlo Way is a two-way, two-lane street (one lane in each direction) with Class II bicycle facilities.

The comment regarding viable transportation options is acknowledged. As described on draft SEIR p. 3.B-38, the proposed project would include a TDM plan that would implement measures to reduce vehicle trips and encourage sustainable modes of transportation.

Transit Capacity

Pursuant to the 2019 TIA Guidelines Update, transit capacity for environmental review is no longer an analysis criterion. This change is consistent with guidance from the Governor's Office of Planning and Research, which recommends not treating the addition of new users on a transit system as a significant impact. Transit analysis instead considers potentially hazardous conditions for public transit operations as separate transit significance criteria. San Francisco also considers transit delay as a separate transit significance criterion. Transit impacts are presented and discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79; Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99; and Response TR-4, Transit Impacts, on RTC p. 4.C-33