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Sent: Monday, June 1, 2020 9:36 AM
To: ECN, BalboaReservoirCompliance (ECN) <balboareservoircompliance.ecn@sfgov.org>
Subject: FW: Balboa Reservoir Final EIR: Significance Threshold for Transit Delay

From: aj <ajahjah@att.net>
Sent: Sunday, May 24, 2020 12:48 PM
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Planning Commission, Land Use & Transportation Committee (File 200422, 200423), SFCTA, SFMTA, BRCAC:

Planning Dept Staff contends that its 4-minute Threshold of Significance for Transit Delay is supported by substantial evidence. This contention is false.

The claimed "substantial evidence" consists of a one-sentence assertion in the Planning Department's "Transportation Assessment Guideline" and in its Appendix I "Public Transit Memorandum." That one-sentence "substantial evidence", in its entirety, consists of:

"For individual Muni routes, if the project would result in transit delay greater than or equal to four minutes, then it might result in a significant impact."

o **4-MINUTE THRESHOLD OF SIGNIFICANCE FOR TRANSIT DELAY IS AN UNSUPPORTED ASSERTION, LACKING SUBSTANTIAL EVIDENCE**

- The Final SEIR uses a quantitative threshold of significance of 4-minute Reservoir-related Transit Delay. In other words, Transit Delay is considered insignificant unless the Project contributes 4 minutes of delay to a MUNI line. In the real world of MUNI passengers and operators, a 4-minute delay in a short stretch near the Reservoir is extremely significant.
- The establishment of a quantitative threshold of significance is required to be based on "substantial evidence." The Final SEIR claims that substantial evidence for the 4-minute threshold of significance is contained in Planning Dept's "Transportation Impact Assessment Guidelines." Contrary to the claim of "substantial evidence", the 4-minute

significance criterion contained in the TIA Guidelines is only an assertion, without any evidence whatsoever. The "substantial evidence" for the 4-minute delay significance criterion consists of this one sentence: *"For individual Muni routes, if the project would result in transit delay greater than or equal to four minutes, then it might result in a significant impact."* This one sentence constitutes the entirety of the claimed "substantial evidence" in the TIA Guidelines. This one sentence appears in the body of the TIA Guidelines and, again, in the Appendix I "Public Transit Memorandum." However, repetition of a one-sentence assertion does not constitute "substantial evidence."

- Planning Staff repeatedly cites the City Charter Section 8A.103 (c)1 as justification for the Project's 4-minute threshold of significance. 8A.103 (c)1 sets a lateness standard for MUNI at scheduled timepoints. The MUNI on-time performance criterion was not meant to allow the Reservoir Project to add an additional 4-minute delay on top of the pre-existing MUNI lateness standard. Isn't this simple common sense that a project that adds an additional 4-minute delay over and above pre-existing MUNI delay would be significant?!
- The 4-minutes late significance threshold only serves as a "Get Out of Jail Free card" for the Project's real-world significant contribution to Transit Delay.

submitted by:

Alvin Ja, District 7