

From: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Sent: Monday, June 15, 2020 1:55 PM
To: ECN, BalboaReservoirCompliance (ECN) <balboareservoircompliance.ecn@sfgov.org>
Subject: FW: Comment #1 for 6/16/2020 SFMTA meeting--Item 11 Balboa Reservoir EIR on transit delay

From: Hong, Seung Yen (CPC) <seungyen.hong@sfgov.org>
Sent: Monday, June 15, 2020 1:22 PM
To: Exline, Susan (CPC) <susan.exline@sfgov.org>; Lutenski, Leigh (ECN) <leigh.lutenski@sfgov.org>; Paine, Carli (MTA) <Carli.Paine@sfmta.com>; Wietgreffe, Wade (CPC) <wade.wietgreffe@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Subject: FW: Comment #1 for 6/16/2020 SFMTA meeting--Item 11 Balboa Reservoir EIR on transit delay

From: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Sent: Monday, June 15, 2020 12:58 PM
To: Hong, Seung Yen (CPC) <seungyen.hong@sfgov.org>
Subject: FW: Comment #1 for 6/16/2020 SFMTA meeting--Item 11 Balboa Reservoir EIR on transit delay

Commission Affairs

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9111 | www.sfplanning.org
[San Francisco Property Information Map](#)

REDUCED CAPACITY DURING THE SHELTER IN PLACE ORDER -- The Planning Department is open for business. Most of our staff are working from home and we're [available by e-mail](#). Our [Public Portal](#), where you can file new applications, and our award-winning [Property Information Map](#) are available 24/7. Similarly, the [Board of Appeals](#) and [Board of Supervisors](#) are accepting appeals via e-mail despite office closures. To protect everyone's health, all of our in-person services at 1650 and 1660 Mission Street are suspended, and the Planning and Historic Preservation Commissions are cancelled until April 9, at the earliest. [Click here for more information.](#)

From: aj <ajahjah@att.net>
Sent: Monday, June 15, 2020 12:42 PM
To: Boomer, Roberta (MTA) <Roberta.Boomer@sfmta.com>; MTABoard <mtaboard@sfmta.com>
Cc: Major, Erica (BOS) <erica.major@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Cat Carter <cat@sftransitriders.org>; DPH - thea <thea@nextstepsmarketing.com>; Robert Feinbaum <bobf@att.net>; BRCAC (ECN) <brcac@sfgov.org>; SNA BRC <sna-brc@googlegroups.com>
Subject: Comment #1 for 6/16/2020 SFMTA meeting--Item 11 Balboa Reservoir EIR on transit delay

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

SFMTA Board, Balboa Reservoir CAC:

An EIR is supposed to be "adequate, accurate, and objective."

The Balboa Reservoir EIR fails the requirements for being accurate and objective. The Project's facts have been--like the facts to justify the Iraq War-- fixed around the policy.

- **SUPPLEMENTAL EIR CONTRADICTS PROGRAM EIR's FINDING OF SIGNIFICANT TRANSIT DELAY**

- The SEIR concludes that there will less-than-significant impact on transit delay (Impact TR-4) from the Reservoir Project. This directly contradicts the Balboa Park Station Program EIR's conclusion:

"...ingress...from Lee Avenue [westbound right turn-only ingress to Lee Extension] would result in significant adverse transportation impacts. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan. (FEIR, p.191)

- **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 in the Appendix I "Public Transit Memorandum." However, repetition of a one-sentence assertion does not constitute "substantial evidence."
- 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.

- **REMOVAL OF UNFAVORABLE DATA IN FINAL SEIR**

- The draft SEIR contained Transit Delay data that was found to be unfavorable to the Project.
 - Kittelson Associates (EIR Transportation Analysis contractor) data from Table 3.B-18 "Transit Delay Analysis" was computed to show Reservoir-related delay of 1 minute 55 seconds for a 7-minute running time route segment--a 27.4% increase over the scheduled 7-minute running time between two 43 Masonic scheduled timepoints. Table 3.B-18 was replaced in the Final SEIR to eliminate the unfavorable Reservoir-related Transit Delay.
 - The draft SEIR assessed Transit Delay for Geneva Avenue between City College Terminal and Balboa Park Station. This segment is travelled by the 8 Bayshore and

the 43 Masonic. The data for this segment has been eliminated and Table 3.B-8 has been replaced. The new Table 3.B-8 eliminates the 8 Bayshore from assessment entirely, disappeared! Once again, unfavorable data has been eliminated from the Final SEIR.

- In place of the removed data, the Final SEIR replaced the original unfavorable data with new data. The new, more favorable, data was collected on 12/18/2019—Finals Week, before Xmas. Finals Week just before Xmas is not representative of a normal school day.

• INADEQUATE MITIGATION MEASURES

- The Final SEIR contains three new Transit Delay Mitigation Measures: 1) Signal timing modifications at Ocean/Brighton, 2) Signal timing modifications at Ocean/Lee, 3) Boarding island for southbound 43 at Frida Kahlo/Ocean.
 - These mitigation measures are "finger in the dyke" measures that are incommensurate with the root problem. The fundamental unsolvable problem is the limited roadway network surrounding the Project. That is why the Balboa Park Station Area Final Program EIR had determined that a Lee Extension ingress *"would result in significant adverse transportation impacts. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan."*

Don't just be an unthinking rubber stamp to an EIR that is neither objective nor accurate.

--Alvin Ja, retired MUNI Operator/Inspector/Dispatcher/Instructor; Main author of original 3rd Street Rail Operator Training manual