From:	aj
To:	Board of Supervisors, (BOS); Lew, Lisa (BOS); Wong, Jocelyn (BOS)
Subject:	Doc. 9 for EIR Appeal-- COMMENT ON “Summary of Impacts of Proposed Project—Disclosed in SEIR including Initial Study” Table...
Date:	Thursday, August 6, 2020 1:27:43 PM
Attachments:	Comment 14a-SOUTHBOUND 43 MASONIC DELAY.docx Comment 14b-SEIR Project Delay.docx Comment 14c-Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics.docx

BOS:

On 9/20/2019, I submitted a comment on the Draft EIR regarding 'Summary of Impacts of Proposed Project, Table s-2'.

Since I had already made comments in my Documents 1-8 on the subject matter of TR-4 and C-TR-4 (Transit Delay, Cumulative Transit Delay, Mitigation Measures), I present no new comments herein.

I wish to note that the second attachment is the **original** Table 3.B-18 'Transit Delay Analysis'. The original data was replaced in the Final EIR with more favorable data that was collected on Finals Week (12/17 & 12/18/2019), the week before Xmas 2019.

--aj

On Friday, September 20, 2019, 10:24:15 PM PDT, aj <ajahjah@att.net> wrote:

COMMENT ON

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

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

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

I summarize how this determination is incorrect.

1. The threshold of significance that is used to come to the LTS determination is based on an inordinately low standard for the threshold. The establishment of a 4-minute late threshold before Reservoir-related transit delay "might" be considered significant is big enough for a tank to go through. By defining the transit delay threshold to be 4 minutes, the Reservoir Project is issued a "get out of jail free card".

2. The City Charter establishes performance criteria for MUNI. Section 8.A 103 (c) establishes that a MUNI bus/car that arrives over 4 minutes late to a timepoint is considered to be late, for the purposes of the City Charter mandate.

3. The SEIR/Reservoir Project threshold of significance gives the Project the privilege of independently adding 4 minutes of additional delay to MUNI before the Reservoir Project transit delay "might" be considered significant. This freedom and privilege to independently add 4 minutes Reservoir-related delay flies in the face of the intent of the Transit First Policy.

4. Attached for your convenience, I include 3 tables:
    a. SB 43 Masonic Delay: MUNI Standard v. Reservoir Standard
        - This Table relates to the 43 line between the Monterey/Gennessee timepoint and the Balboa Park Station timepoint:
            - The running time between the two timepoints is 7 minutes;
            - The MUNI late standard is 11 minutes;
            - The SEIR/Project threshold of significance is 19 minutes: a **171% increase over the scheduled 7 minutes.**
    b. SEIR Table 3.B-18 Transit Delay Analysis
        - This Table presents SEIR's own numbers for "Project-Related Increase in Delay"
            - The Table lowballs the actual delay for the 43 Masonic. The SEIR presents delays of 73 seconds and 83 seconds for Options 1 and 2, respectively. The numbers presented by the SEIR omit the 43 segment between City College Bookstore and Balboa Park Station.
            When the Bookstore-BPS segment (Geneva Ave EB) is factored in properly, the delays come out instead to 115 seconds (1.9 minutes) and 141 seconds (2.4 minutes) for Options 1 and 2, respectively. 115 seconds and 141 seconds of Project-related delay constitute **increases of 27.4% and 33.6% over the 7-minute Monterey/Gennessee-BP Station segment's running time.**
            - Comparing the Reservoir-related delay for the 43's Monterey/Gennessee-BP Station segment to the City-Charter-mandated 4-minute late allowance:
                - Option 1's delay of 115 seconds **consumes**

48.0% of the 4 minutes of lateness allowed to MUNI;
- Option 2's delay of 141 seconds **consumes 58.8% of the 4 minutes of lateness allowed to MUNI**

- **These percentages of 171%, 27.4%, 33.6%, 48.0%, and 58.8% are objectively significant. These percentages can only be made "less than significant" by the establishment of a threshold of significance of 4 minutes, which is constructively a "get out of jail free card."**

c. Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics

- This Table is compiled from current (effective 9/5/2019) MUNI schedules for KT, 8/8BX, 29, 43, 49, 54 lines. For weekday AM Peak, Mid-day, and PM Peak, I have compiled headways and running times.
- Using the SEIR's 4-minute threshold of significance, the last two columns provide Reservoir Project-related contribution percentages to running time delay and to MUNI's 4-minute late allowance:
  - K Ingleside: **23.5% - 30.8% delay contribution** between BP Station-St. Francis Circle;
  - 8/8BX Bayshore (IB only): **50% - 66.7%** delay contribution between Unity Plaza-Geneva/Mission;
  - 29 Sunset: **25.0% - 33.3%** delay contribution between 19th/Holloway- Balboa Park Station;
  - 43 Masonic: **44.4% - 57.1%** delay contribution between Monterey/Gennessee- Balboa Park Station;
  - 49 Van Ness: **50.0% - 57.1%** delay contribution between Mission/Ocean- Unity Plaza

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

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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.)

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

It is only with willful disregard for reality that the SEIR can come to a conclusion that a

1,110- 1,550 unit project will have less than significant impact on an area which the Nelson-Nygaard TDM Study described as having "limited roadway space, transit infrastructure, …" **in Impact TR-4**.

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

Mitigation Measure M-C-TR-4:

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

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

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

Regarding the effectiveness of TDM as mitigation, please examine the attached "Balboa Reservoir's TDM Non Sequitur."

Submitted by:

Alvin Ja

9/20/2019

SOUTHBOUND 43 MASONIC DELAY:

MUNI STANDARD v. RESERVOIR PROJECT STANDARD

SOUTHBOUND 43 MASONIC DELAY: MUNI STANDARD v. RESERVOIR STANDARD						
ROUTE SEGMENT		TIME POINT		ON-TIME	ADDITIONAL DELAY TIME	
				MUNI on-time	MUNI late standard (4 min)	Reservoir Late standard (additional 4 min)
ELAPSED TIME:		Monterey/Gennessee		0:00	0:00	0:00
Monterey/Gennessee 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**

Transit Assessment 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
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.

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

Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics

LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes		
SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)	
K Ingleside	AM PEAK	MID-DAY	PM PEAK	KT Geneva/San Jose-St. Francis Circle	23.5% to 30.8%	100%	
	IB: 9-12	IB & OB: 10	IB: 9-10	AM: 14 MID-DAY: 13 PM: 17			
	OB: 8-10		OB: 8-10	AM: 15 MID-DAY: 15 PM: 16			
8/8BX Bayshore	AM PEAK	MID-DAY	PM PEAK	8/8BX Geneva/Mission – Unity Plaza	(For Inbound only) 50% to 66.7%	100%	
	IB: 6-7	IB: 7	IB: 6-7	AM: 8 MID-DAY: 6 PM: 8			
	OB: 7	OB: 7-8	OB: 7	(not available) AM: MID-DAY: PM:			

LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME FOR ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes		
SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)	
29 Sunset	AM PEAK	MID-DAY	PM PEAK	29 19TH/Holloway-Ocean BART	25% to 33.3%	100%	
	IB: 9	IB & OB: 12	IB: 10-12	AM: 12 MID-DAY: 14 PM: 15-17			
	OB: 10		OB: 10	AM: 15-16 MID-DAY: 15 PM: 16			
43 Masonic	AM PEAK	MID-DAY	PM PEAK	43 Monterey/ Gennessee-Geneva BART	44.4% to 57.1%	100%	
	IB: 9	IB & OB: 12	IB: 10	AM: 9 MID-DAY: 8 PM: 8			
	OB: 10		OB: 10	AM: 7-8 MID-DAY: 7 PM: 7			

LINE	WEEKDAY HEADWAY (minutes)			BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints)	RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes		
SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019					Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!)	Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!)	
49 Van Ness	AM PEAK	MID-DAY	PM PEAK	49 Mission/Ocean-Unity Plaza	50.0% to 57.1%	100%	
	IB: 8	IB & OB: 9	IB: 8	AM: 8-9 MID-DAY: 8 PM: 9			
	OB: 10		OB: 7-8	AM: 8 MID-DAY: 7 PM: 8			
54 Felton	AM PEAK	MID-DAY	PM PEAK	54 Geneva/Mission-Geneva BART			
	IB & OB: 20 min			AM: 4 MID-DAY: 4 PM: 5			
				AM: 4-5 MID-DAY: 4 PM: 5			