

# ENCLOSURE 3

## Better Market Street California Environmental Quality Act Findings SAN FRANCISCO PUBLIC WORKS

### PREAMBLE

In determining to approve the Project and related approval actions, San Francisco Public Works makes and adopts the following findings of fact and decisions, the Project description and objectives, significant impacts, significant and unavoidable impacts, mitigation measures and alternatives, and a statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and pursuant to the California Environmental Quality Act, California Public Resources Code Sections 21000 et seq. ("CEQA"), particularly Sections 21081 and 21081.5, the Guidelines for Implementation of CEQA, 14 California Code of Regulations Sections 15000 et seq. ("CEQA Guidelines"), Sections 15091 through 15093, and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"). San Francisco Public Works adopts these findings in conjunction with the Approval Actions described in Section I(E), below, as required by CEQA, separate and apart from the Planning Commission's certification of the Project's Final Environmental Impact Report ("EIR"), which the Planning Commission certified prior to adopting these CEQA findings.

These findings are organized as follows:

- **Section I** provides a description of the proposed Better Market Street project (hereinafter, the "Project"), analyzed in the Final EIR, the environmental review process for the Project, consistency with City plans and policies, the City approval actions to be taken, and the location and custodian of the records.
- **Section II** lists the Project's less-than-significant impacts that do not require mitigation.
- **Section III** identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures.
- **Section IV** identifies significant project-specific or cumulative impacts that would not be eliminated or reduced to a less-than-significant level and describes any applicable mitigation measures as well as the disposition of the mitigation measures. The Final EIR identified mitigation measures to address these impacts, but implementation of the mitigation measures will not reduce the impacts to a less than significant level.

Sections III and IV set forth findings as to the mitigation measures proposed in the Final EIR. (The Draft EIR and the Comments and Responses document together comprise the Final EIR.) Attachment B to these CEQA findings contains the Mitigation Monitoring and Reporting Program

("MMRP"), which provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report that is required to reduce a significant adverse impact.

- **Section V** identifies the project alternatives that were analyzed in the EIR and discusses the reasons for their rejection and identifies again alternatives that were considered but rejected at the start of the EIR process.
- **Section VI** sets forth Public Works Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

Attached to these findings as Attachment B is the Mitigation Monitoring and Reporting Program (MMRP) for the mitigation measures that have been proposed for adoption. The MMRP is required by Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091. It provides a table setting forth each mitigation measure listed in the Final EIR that is required to reduce or avoid a significant adverse impact. The MMRP also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule.

Public Works further finds that, as part of the process of obtaining Project approval, all significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where, and to the extent, feasible. All mitigation measures proposed in the FEIR and MMRP that are within San Francisco Public Works enforcement authority and applicable to the Project are adopted as part of Public Works approval action. PW encourages the San Francisco Municipal Transportation Agency Board of Directors and other governmental agencies with approval actions related to this project to adopt those mitigation measures within its or their own enforcement authority as part of any action of the subject agency.

These findings are based upon substantial evidence in the entire record before the Planning Commission, Public Works and the SFMTA. The references set forth in these findings to certain pages or sections of the Draft Environmental Impact Report (Draft EIR) or Responses to Comments Document (RTC) are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

## **SECTION I. The Proposed Better Market Street Project**

### **A. Project Description**

The project sponsor, San Francisco Public Works (Public Works), in coordination with the Citywide Planning Division of the San Francisco Planning Department (Planning Department) and the San Francisco Municipal Transportation Agency (SFMTA), proposes to implement the Better Market Street Project (proposed project or project). The proposed project would redesign and provide transportation and streetscape improvements to a 2.2-mile-long corridor.

The project corridor encompasses primarily Market Street between Steuart Street and Octavia Boulevard. It includes portions of streets that intersect Market Street, four off-corridor intersections, and the entirety of Charles J. Brenham Place. The project corridor also includes the portion of Valencia Street between Market Street and McCoppin Street.

The project would introduce changes to the roadway configuration as well as private vehicle access, traffic signals, surface transit (including San Francisco Municipal Railway– (Muni-) only lanes, stop spacing and service, stop locations, stop characteristics, a new F-loop, and infrastructure), bicycle facilities, pedestrian facilities, streetscapes, commercial and passenger loading, vehicular parking, and utilities. The project would also change traffic configurations on adjacent streets that intersect Market Street to both the north and the south.

### **1. The Western Variant**

The Western Variant is located along Market Street between Octavia Boulevard and a point approximately 300 feet east of the Hayes and Market Street intersection. The Western Variant seeks improvements beyond those of the proposed project related to pedestrian and bicyclist safety, comfort, and mobility through additional reductions to conflicts between different modes of transportation.

The Western Variant would reduce the number of westbound (outbound) travel lanes on Market Street from two to one between Hayes and 12th streets. The Western Variant would also reduce from two to one the number of eastbound (inbound) travel lanes between 12th and 11th streets. The Western Variant would restrict access to Market Street for all westbound (outbound) private and commercial vehicles between Hayes Street and 12th Street. All commercial vehicles heading westbound on Market Street would be required to turn right at the Hayes/Larkin Street intersection. All commercial and private vehicles heading eastbound (inbound) would be required to turn right or left at the 12<sup>th</sup>/Franklin/Page Street intersection. Additional turn restrictions are proposed along Market Street at Van Ness and Franklin/Page streets.

The Project, as proposed for approval, includes both the preferred project and the Western Variant.

## **B. Project Objectives**

The project sponsor and project partners developed the following objectives for the proposed project. The following also identifies the basic (i.e., most important) objectives:

**Place:** Make Market Street the signature sustainable street in San Francisco and the Bay Area by creating a memorable and active identity, with gathering spaces, the ability to promenade, a healthy urban forest, and a vibrant public life.

- Provide an accessible sidewalk that identifies Market Street as one of the city’s pre-eminent ceremonial streets (basic objective);
- Correct the barriers that Market Street’s existing design poses to accessibility, its lack of accommodation for bicycles, its problems arising from wide paved areas without any dedicated use, and its arboricultural deficiencies;
- Maximize the reuse of underutilized street space to encourage the activation of public spaces; and
- Use high-quality materials fitting for the city’s pre-eminent ceremonial street.

**Mobility:** Optimize the reliability, safety, efficiency, and comfort of all users of sustainable transportation modes (transit, walking, and cycling) while balancing their respective needs within the physical constraints of the public right-of-way.

- Provide facilities that are designed to reduce the number of traffic fatalities, collisions, and severe injuries to the extent feasible (basic objective);
- Provide a bicycle facility that is designed to reduce the number of collisions involving bicycles, as much as feasible, from Steuart Street to Octavia Boulevard (basic objective);
- Reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible (basic objective);
- Provide an appropriate pedestrian throughway and improve (i.e., reduce) crossing distances;
- Optimize the surface public transit system's capacity and travel times in the project corridor and vicinity (basic objective); and
- Replace infrastructure when nearing the end of its useful life on this section of Market Street to keep people, goods, and City and County of San Francisco (City) services moving (basic objective).

**Economic Development:** Ensure that all improvements and plans are coordinated with urban redevelopment efforts to foster an economically productive, healthy, and resilient corridor.

- Integrate transportation improvements with the Mid-Market revitalization planning effort to improve the economic health and productivity of Market Street (basic objective);
- Provide commercial loading zones that do not impede or introduce new barriers to the movement of goods and people along Market Street; and
- Support planned housing and job growth in the project corridor, consistent with adopted land-use plans.

### C. Environmental Review

Public Works submitted an environmental evaluation application, dated December 27, 2013, to the Planning Department to initiate the environmental review process. The Planning Department published a Notice of Preparation (NOP) for an EIR and notice of public scoping meeting on January 14, 2015. In addition to providing a project description, a map with the project location, and a summary of potential environmental issues related to project implementation, the NOP provided information about the public scoping meeting, which was conducted on February 4, 2015, at the Ground Floor Conference Room, 1455 Market Street, San Francisco. The purpose of this meeting and publication of the NOP was to solicit comments regarding the scope of the EIR. Since publication of the NOP, the project sponsor has continued outreach to stakeholders and continued refinement of the project design to facilitate the environmental review process.

The Notice of Availability (NOA) of the Initial Study and the Initial Study prepared for the proposed project were published on March 30, 2016. The Initial Study examined the proposed project to identify its potential effects on the environment. The Initial Study determined the

following topics did not need to be analyzed in the EIR because they were identified as no impact or less-than-significant impacts: Land Use, Aesthetics, Population and Housing, existing noise levels and airport noise, objectionable odors affecting substantial numbers of people under Air Quality, Greenhouse Gas Emissions, creation of new shadows that substantially affect outdoor recreation facilities or other public areas under Wind, Recreation, Utilities and Service Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Mineral and Energy Resources and Agricultural Resources.

The Initial Study found that impacts on archaeological resources would be less than significant with implementation of mitigation. Refinements to the proposed project occurred after the Initial Study, including, but not limited to, the proposed excavation at Second and Stevenson streets (discussed in Chapter 2 of the Draft EIR, Project Description), and had the potential to affect archaeological resources beyond the extent to which they were considered in the 2016 Initial Study. A discussion of impacts on archaeological resources was included in the Draft EIR and Public Works Standard Construction Measures, along with Standard Archaeological Measure II, Monitoring, will be incorporated into Better Market Street construction contracts. Therefore, the proposed project's impact on archeological resources would be less than significant.

The Draft EIR (or "DEIR") fully and separately evaluates the proposed project and the Western Variant and analyzes significant effects that could result from the proposed project. As explained in section 15002(g) of the CEQA Guidelines, a significant effect on the environment is defined as a substantial adverse change in the physical conditions that exist in the area affected by a project. Pre-project environmental conditions (the environmental baseline) are considered in determining impact significance. The Draft EIR was circulated for review and comment by the public and other interested parties, agencies, and organizations for 47 calendar days. The review period began on February 28, 2019, and closed on April 15, 2019. The Planning Commission Hearing was held on April 4, 2019 at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 400.

The State Natural Resources Agency adopted the final text to an update to the CEQA Guidelines on December 28, 2018. The planning department issued an initial study for this project March 30, 2016, nearly three years prior to the CEQA Guidelines updates. The Planning Department determined that the analyses in the draft EIR, including the initial study, substantively address all topics and questions in the updated CEQA Guidelines. Therefore, the Planning Department found it unnecessary in most places to change the language in the EIR to reflect the updated CEQA Guidelines.

Following the close of the public review period, the City prepared a document entitled "Responses to Comments," which contains a copy of all comments on the Draft EIR, the City's responses to those comments, copies of the letters received, a transcript of the planning commission's public hearing on the Draft EIR, and any necessary revisions to the Draft EIR. The Draft EIR, along with the responses to written and oral substantive comments received during the review period, make up the Final EIR (or "FEIR") and will be considered by the Planning Commission and Board of Supervisors, on appeal if an appeal is filed, in making the decision whether the Final EIR should be certified.

The Final EIR was published September 23, 2019 for public review more than 10 days prior to its certification hearing (CEQA Guidelines section 15088(b)) at the Planning Commission on October

10, 2019. The Planning Commission considered the documents, found them to be adequate, and certified the Final EIR at its advertised public meeting.

#### **D. Consistency with San Francisco Plans and Policies**

##### **San Francisco Planning Code and Zoning Map**

Section 203 of the San Francisco Planning Code (Planning Code) states that the Planning Code shall not limit the construction, installation or operations by any public agency of any street or transportation line, or of incidental appurtenances to any of the foregoing when located in a street, alley, or other right-of-way. The modifications proposed for the streets and sidewalks within the Project corridor, as well as portions of UN and Hallidie plazas, would occur within the existing operational public right-of-way and would therefore not be subject to the Planning Code and require variances, special authorizations, or changes to the Planning Code or Zoning Map. Modifications on those portions of UN and Hallidie plazas that are owned by the City (and not part of the dedicated public right-of-way) are zoned as Public and are subject to the Planning Code and Zoning Map. However, because the proposed uses at UN and Hallidie plazas would continue the current land uses at these locations and other changes would generally be consistent with the Public designation, modifications to the plazas are not anticipated to require variances, special authorizations, or changes to the Planning Code or Zoning Map.

##### **San Francisco General Plan**

The San Francisco General Plan (General Plan), which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The General Plan contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies and objectives for the physical development of the City. The compatibility of the Proposed Project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of certain decisions related to the Proposed Project.

##### **Proposition M – The Accountable Planning Initiative**

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight Priority Policies. These policies, and the topics of the Evaluation of Environmental Effects addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 14 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 9a and b, Wind and Shadow, and Questions 10a and c, Recreation). Prior to issuing a permit for any project that requires an Initial Study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the project or

legislation would be consistent with the Priority Policies. The compatibility of the Proposed Project with Proposition M objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of certain decisions related to the Proposed Project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the Proposed Project.

#### **Additional City Plans and Policies**

Additional City policies, plans, and programs that encompass parts of the Project area or are applicable to the Proposed Project include the San Francisco Bicycle Plan, Better Streets Plan, Complete Streets Policy (Public Works Code Section 2.4.13), Vision Zero SF (the City's road safety policy), Transit First Policy (Charter Section 8A.115), Climate Action Plan For San Francisco, San Francisco County Transportation Authority's Congestion Management Program, and Advanced Technology/Information Systems Transit Signal Priority (SFgo). The compatibility of the Proposed Project with the above policies, plans and programs that do not relate to physical environmental issues will be considered by decision-makers as part of certain decisions related to the Proposed Project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the Proposed Project.

#### **Regional Plans and Policies**

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG's) Projections 2013, the Bay Area Air Quality Management District's (BAAQMD's) Bay Area 2010 Clean Air Plan (2010 Clean Air Plan), the Metropolitan Transportation Commission's Regional Transportation Plan – Transportation 2035, the San Francisco Regional Water Quality Control Board's San Francisco Basin Plan, and the San Francisco Bay Conservation and Development Commission's San Francisco Bay Plan. Many of these plans and policies include programs and policies related to the implementation of projects and improvements intended to better manage and improve various transportation modes within the existing City right-of-way. Because of the constraints of the existing public right-of-way, the City balances the needs of all transportation modes that share the right-of-way including bicycles, pedestrians, transit, and vehicles. Conflicts between plans that focus on a particular mode within the City right-of-way may arise. However, many of the plans and policies include language that indicates that implementation of programs or capital improvements would be coordinated with Public Works improvements, including the Proposed Project.

### **E. Approval Actions**

Project implementation would require numerous federal, state, and local reviews, permits, and approvals. Federal approval would also require environmental review pursuant to the National Environmental Policy Act. Project implementation also may involve consultation with, or require approvals by, state and local regulatory agencies, including:

- San Francisco Public Works
- San Francisco Municipal Transportation Agency Board of Directors
- San Francisco Board of Supervisors
- San Francisco Planning Department

- San Francisco Historic Preservation Commission
- San Francisco Public Utilities Commission
- San Francisco Capital Planning Committee
- San Francisco Arts Commission
- San Francisco Transportation Advisory Staff Commission
- San Francisco County Transportation Authority Board
- California Department of Transportation
- San Francisco Bay Area Rapid Transit District
- Metropolitan Transportation Commission
- California Public Utilities Commission

#### **F. Contents and Location of Record**

The record upon which all findings and determinations related to the Project consists of those items listed in Public Resources Code section 21167.6, subdivision (e), including but not limited to the following documents, which are incorporated by reference and made part of the record supporting these findings:

- The NOP and all other public notices issued by the Planning Department or Commission in conjunction with the Project.
- The FEIR and all documents referenced in or relied upon by the EIR. (The references in these findings to the FEIR include the DEIR, the RTC, and the Initial Study.)
- The MMRP for the Project.
- All findings, resolutions, and other approvals adopted by the Planning Commission, Public Works, and SFMTA Board in connection with the Project, and all documents cited or referred to therein.
- All information relating to the FEIR, the Project, and the alternatives set forth in the FEIR or these CEQA findings.
- All information provided by the public, including the proceedings of the public hearings on the adequacy of the DEIR and the transcripts of the hearings, including the Planning Commission hearing on April 4, 2019, and written correspondence received by Planning Department staff during the public comment period of the DEIR.
- All information and documents included on the website prepared for the Project, which are available at the following link: <http://bettermarketstreetsf.org>

Public Works has relied on all the documents listed above in reaching its decision on the Project, even if not every document was formally presented to it.



The public hearing transcript, a copy of all letters regarding the DEIR received during the public review period, the administrative record, and background documentation for the FEIR, as well as additional materials concerning approval of the Project and adoption of these findings are contained in the Project files which are available by contacting Jonas P. Ionin, Director of Commission Affairs, the Custodian of Records for the Planning Department, at 1650 Mission Street, Suite 400, San Francisco, CA 94103, or the Custodian of Records for Public Works, David Steinberg, Public Works Executive Assistant to the Director, at San Francisco City Hall, Room 348 - 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102, and the Custodian of Records for SFMTA, Roberta Boomer, SFMTA Board Secretary, at 1 South Van Ness, 7th Floor, San Francisco, CA 94103. All files have been available to Public Works and the public for review in considering these findings and whether to approve the Project.

## **SECTION II. Less-than-significant impacts that do not require mitigation**

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.) Based on substantial evidence in the whole record of this proceeding, Public Works agrees that implementation of the Project will not result in any project specific or cumulative significant impacts in the following areas and that these impact areas, therefore, do not require mitigation. In some instances, the Project would have no impact in a particular area; these instances are denoted below by "NI" for no impact.

### **A. Cultural Resources**

1. Impact CP-1.A. The proposed project and project variant would not cause a substantial adverse change in the significance of the Market Street Cultural Landscape District as San Francisco's main circulation artery and facilitator of urban development.
2. Impact CP-1.B. The proposed project and project variant would not cause a substantial adverse change in the significance of the Market Street Cultural Landscape District as a venue for civic engagement in San Francisco.
3. Impact CP-2. The proposed project and project variant would not cause a substantial adverse change in the significance of a historic district considered to be a historical resource, as defined in section 15065.5.
4. Impact CP-3. The proposed project and project variant would not cause a substantial adverse change in the significance of a building, structure, or object considered to be a historical resource, as defined in section 15064.5.
5. Impact CP-4. The proposed project and project variant's vibration impacts on built resources caused by construction activities would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5.
6. Impact CP-5. The proposed project and project variant would not result in vibration impacts on built resources caused by operations resulting in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5.
7. Impact CP-6. The proposed project and project variant would not cause a substantial adverse change in the significance of an archaeological resource, as defined in section 15064.5.
8. Impact CP-7. The proposed project and project variant would not disturb human remains, including those interred outside of formal cemeteries.

9. Impact C-CP-2. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects in the city, would not result in a significant cumulative impact on archaeological resources.
10. Impact C-CP-3. Construction-related vibration caused by the proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects in the city, would not result in a cumulative impact on historic architectural resources.

## **B. Transportation and Circulation**

1. Impact TR-2. The proposed project and project variant would not cause substantial additional VMT or induced automobile travel.
2. Impact TR-3. The proposed project and project variant would not create major traffic hazards
3. Impact TR-4. The proposed project and project variant would not result in a substantial increase in delays or operating costs such that significant adverse impacts on local or regional transit would occur.
4. Impact TR-5. The proposed project and project variant would not create hazardous conditions for people walking, or otherwise interfere with accessibility for people walking to the site or adjoining areas.
5. Impact TR-6. The proposed project and project variant would not result in potentially hazardous conditions for bicyclists, or otherwise interfere with bicycle accessibility to the project site or adjacent areas.
6. Impact TR-7. The proposed project and project variant would not result in a reduction in on-street commercial and passenger loading supply such that loading demand during the peak hour of loading activities would not be accommodated with the loading supply
7. Impact TR-8. The proposed project and project variant would not result in a reduction in on-street parking supply such that a substantial parking deficit would occur.
8. Impact TR-9. The proposed project and project variant would not result in inadequate emergency vehicle access.
9. Impact C-TR-2. The proposed project and variant, in combination with past, present, and reasonably foreseeable future projects, would not contribute considerably to significant cumulative impacts related to VMT
10. Impact C-TR-3. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts related to major traffic hazards.
11. Impact C-TR-5. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts on people walking.
12. Impact C-TR-6. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative bicycle impacts.
13. Impact C-TR-7. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not contribute considerably to significant cumulative loading impacts.

14. Impact C-TR-8. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts related to parking.
15. Impact C-TR-9. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative emergency access impacts.

### **C. Noise and Vibrations**

1. Impact NO-2. Operation of the proposed project and project variant would not result in the exposure of persons to or generation of noise levels in excess of the San Francisco Noise Ordinance or a substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity, above levels existing without the project.
2. Impact NO-4. Operation of the proposed project and project variant would not expose persons to or generate excessive groundborne vibration levels related to annoyance. Operation of the project would not generate excessive ground-borne vibration levels related to damage to buildings.
3. Impact C-NO-2. Operation of the proposed project and project variant, in combination with other past, present, and reasonably foreseeable future projects in the city, would not result in the exposure of persons to noise in excess of the applicable local standards or a substantial permanent ambient noise level increase in the project vicinity.
4. Impact C-NO-3. Construction and operation of the proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts related to vibration.

### **D. Air Quality**

1. Impact AQ-2. Operation of the proposed project and project variant would not result in emissions of criteria pollutants at levels that would violate an air quality standard or contribute to an existing air quality violation.
2. Impact C-AQ-2. The proposed project and project variant's operation, in combination with other past, present, and reasonable future projects, would not contribute to cumulative regional air quality impacts

### **E. Wind**

1. Impact WS-1. The proposed project and project variant would not alter wind in a manner that would substantially affect public areas.
2. Impact C-WS-1. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, could alter wind in a manner that would substantially affect public areas. However, the proposed project's contribution would not be cumulatively considerable.

## **SECTION III. Potentially significant project-specific and cumulative impacts that can be avoided or reduced to less-than-significant levels with mitigation**

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would

substantially lessen the significant environmental effects of such projects[.]” The same statute provides that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.”

The EIR presents a cumulative impact analysis only where the proposed project, under baseline plus project conditions, would result in a less-than-significant or significant impact. The EIR does not present a cumulative impact analysis if the proposed project, under baseline plus project conditions, would result in no impact. This section presents those significant project-specific and cumulative impacts that can be avoided or reduced to less-than-significant levels with mitigation and describes the mitigation measures that accomplish this.

#### **A. Cultural Resources**

1. Impact CP-8. The proposed project and project variant would result in a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code section 21074.

##### **Mitigation Measure M-CP-4: Tribal Cultural Resources Interpretative Program.**

If the Environmental Review Officer (ERO) determines that a significant archeological resource is present and, in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) that could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant TCR, if feasible.

If the ERO determines that preservation in place of the TCR is both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archeological consultant shall be required when feasible.

If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation in place for the TCR is not a sufficient or feasible option, the project sponsor shall implement an interpretive program for the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials for those displays or installations, the producers or artists of the displays or installations, and a long- term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists; oral histories with local Native Americans; artifacts, displays, and interpretation; and educational panels or other informational displays.

For the reasons specified in the DEIR on page 4.A-92, this mitigation measure would reduce the impact to a less than significant level.

## B. Noise and Vibration

### Project Specific Impacts

1. Impact NO-1. Construction of the proposed project and project variant would generate noise levels in excess of standards or result in substantial temporary increase in ambient noise levels.

**Mitigation Measure M-NO-1: Prepare and Implement a Construction Noise Control Plan to Reduce Construction Noise at Noise-Sensitive Land Uses.** The project sponsor shall develop a noise control plan to reduce construction noise to levels at or below the 90 dBA Leq combined noise standard during daytime hours and reduce noise increases over ambient levels from construction activity to 10 dB or less at noise-sensitive receptor locations. The noise control plan shall also address measures to minimize sleep disturbance at adjacent residential uses where nighttime work is required such that noise levels do not exceed 80 dBA Leq during nighttime hours at residential uses. Implementation of these measures will reduce noise by maximizing the distance between construction sources and receptors, providing shielding between sources and receptors, and limiting when noise-generating construction activity will occur. The noise control plan shall require the following:

- Construction contractors shall specify noise-reducing construction practices that will be employed to reduce construction noise from construction activities. The measures shall be reviewed and approved by Public Works prior to the issuance of construction permits. Measures that can be used to limit noise include, but are not limited to, those listed below.
- Locate construction equipment as far as feasible from noise-sensitive uses.
- Require that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.
- Prohibit idling of inactive construction equipment for prolonged periods (i.e., more than 2 minutes).
- Prohibit gasoline or diesel engines from having unmuffled exhaust systems.
- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible.
- Monitor the effectiveness of noise attenuation measures by taking noise measurements. A plan for noise monitoring shall be provided to the City for review prior to the commencement of each construction stage.
- Prohibit pavement breaking during nighttime hours (between 10 p.m. and 7 a.m.).
- Minimize equipment noise during nighttime hours within 100 feet of the nearest residential use.
- Use noise-reducing enclosures or curtains around equipment that has the potential to disturb nearby land uses.
- Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction shall be “quiet” gasoline-powered compressors or electrically powered compressors, and electric rather than gasoline- or diesel-powered engines shall be used to avoid noise associated with compressed air exhaust from pneumatically powered tools.

However, where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust of the pneumatic tools shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used; which could achieve a reduction of 5 dBA. Quieter equipment shall be used when feasible, such as drills rather than impact equipment.

- Construction contractors shall be required to use “quiet” gasoline-powered compressors or electrically powered compressors and electric rather than gasoline- or diesel-powered forklifts for small lifting.
- Stationary noise sources, such as temporary generators, shall be located as far from nearby receptors as possible; they shall be muffled and enclosed within temporary enclosures and shielded by barriers, which could reduce construction noise by as much as 5 dB, or other measures, to the extent feasible.
- Prior to the issuance of the construction permit, along with the submission of construction documents, the project sponsor shall submit to the Planning Department and Department of Building Inspection a list of measures for responding to and tracking complaints pertaining to construction noise. These measures shall include:
  - Identification of measures that will be implemented to control construction noise.
  - A procedure and phone numbers for notifying the Department of Building Inspection, the Department of Public Health, or the Police Department of complaints (during regular construction hours and off hours).
  - A sign posted onsite describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction.
  - Designation of an onsite construction complaint and enforcement manager for the project.
  - A plan for notification of neighboring residents and nonresidential building managers within 200 feet of the project construction area at least 30 days in advance of extreme noise-generating activities (defined as activities that generate noise levels of 90 dBA or greater) about the estimated duration of the activity and the associated control measures that will be implemented to reduce noise levels.

For the reasons specified in the DEIR on page 4.C-55, this mitigation measure would reduce the impact to a less than significant level.

2. Impact NO-3. Construction of the proposed project and project variant would expose persons to or generate excessive groundborne vibration levels related to annoyance but would not generate excessive ground-borne vibration levels related to damage to buildings.

**Mitigation Measure M-NO-3: Nighttime Construction Vibration Control Measures – Annoyance**

Prior to issuance of a construction permit, a detailed preconstruction vibration assessment and monitoring plan shall be prepared for all construction activities conducted between the hours of 8 p.m. and 7 a.m. This plan shall evaluate and select the smallest feasible equipment that can be used during this construction period and shall recommend the specific location of equipment within the construction area to maximize the distance between the vibration-generating sources and vibration-

sensitive receptors. This plan shall also require that vibration levels at vibration-sensitive receptors along the project corridor do not exceed a PPV vibration level of the strongly perceptible level of 0.10 in/sec for continuous sources and 0.90 in/sec for transient sources.

The project contractor shall:

- Retain the services of a qualified professional to prepare a pre-construction assessment and vibration monitoring plan. This assessment and vibration monitoring plan shall identify all vibration-sensitive receptors adjacent to the project corridor which could be exposed to vibration from nighttime construction activities exceeding a PPV vibration level of 0.10 in/sec for continuous sources and 0.90 in/sec for transient sources. The qualified professional shall submit the plan to Public Works for review and approval prior to issuance of a construction permit.
- Inform vibration-sensitive receptors of upcoming construction activities that may generate high levels of vibration a minimum of one week in advance of such construction activities. Method of notification shall include mailed notices as well as notifications hand posted on doorways. The notification shall include the name and contact information for a person that can be reached during nighttime construction hours.
- Perform real-time vibration monitoring during all construction activities conducted between the hours of 8 p.m. and 7 a.m. at a location representative of the nearest vibration sensitive receptor. If vibration levels exceed a PPV vibration level of 0.10 in/sec for continuous sources and 0.90 in/sec for transient sources, the vibration monitor shall immediately alert the construction manager, who shall immediately cease construction activity. Construction activity shall resume only after the vibration-generating equipment is adjusted or relocated such that the PPV vibration level no longer exceeds 0.10 in/sec for continuous sources and 0.90 in/sec for transient sources, or such activity is otherwise conducted between the hours of 7 a.m. and 8 p.m.

For the reasons specified in the DEIR on page 4.C-64, this mitigation measure would reduce the impact to a less than significant level.

### **C. Air Quality**

1. Impact AQ-1. Construction of the proposed project and project variant would generate fugitive dust and criteria air pollutants but would not violate an air quality standard or contribute substantially to an existing or project air quality violation.
2. Impact AQ-3. Construction and operation of the proposed project and project variant would generate TACs, including DPM, but would not expose sensitive receptors to substantial air pollutant concentrations.
3. Impact AQ-4. The proposed project and project variant would not conflict with, or obstruct implementation of, the 2017 Clean Air Plan.
4. Impact C-AQ-1. The proposed project and project variant's construction, in combination with other past, present, and reasonable future projects, would not contribute to cumulative regional air quality impacts.

5. Impact C-AQ-3. Construction and operation of the proposed project and project variant, in combination with other past, present, and reasonable future projects, would generate TACs, including DPM, but would not expose sensitive receptors to substantial air pollutant concentrations.
6. Impact C-AQ-4. The proposed project and project variant, in combination with other past, present, and reasonable future projects, would not conflict with, or obstruct implementation of, the 2017 Clean Air Plan.

**Mitigation Measure M-AQ-1: Off-Road Construction Equipment Emissions Minimization**

- **Equipment Requirements**

- a. All off-road equipment with engines (greater than or equal to 90 horsepower) shall meet EPA or California Air Resources Board Tier 4 final off-road emissions standards, while equipment with smaller engines (less than 90 horsepower) shall meet or exceed Tier 3 off-road emissions standards.

- **Waivers**

- a. The planning department's environmental review officer (ERO) or designee may waive the requirement for an alternative source of power from subsection (A) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the requirements of subsection (A).
- b. The ERO may waive the equipment requirements of subsection (A) if use of a particular piece of off-road equipment with a Tier 4 final or Tier 3 compliant engine is not feasible or reasonable, the equipment would not produce the desired emissions reductions because of the expected operating modes, installation of the equipment would create a safety hazard or impair visibility for the operator, or a compelling emergency exists that would require the use of off-road equipment that is not Tier 4 final or Tier 3 compliant. If seeking an exception, the project sponsor shall demonstrate to the ERO's satisfaction that the resulting construction emissions would not exceed the NOX threshold of significance, as identified within the EIR under Impact AQ-1. If the ERO grants the waiver, the contractor must use the next cleanest piece of available off-road equipment, according to the table provided on Table S-1.

Notes: If the environmental review officer (ERO) or designee determines that the equipment requirements cannot be met, then the contractor shall meet Compliance Alternative 1. If the ERO or designee determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor shall meet Compliance Alternative 2. If the ERO or designee determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor shall meet Compliance Alternative 3. If the ERO or designee determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 3, then the contractor shall meet Compliance Alternative 4. VDECs = Verified Diesel Emission Controls.

For the reasons specified in the DEIR on page 4.D-35 this mitigation measure would reduce the impact to a less than significant level.

**SECTION IV. Significant project-specific and cumulative impacts that cannot be avoided or reduced to less-than-significant level**



In accordance with sections 21100 (b)(2)(A) and 21100.1(a) of the CEQA Statute and section 15126.2(b) of the CEQA Guidelines, an EIR is required to identify any significant environmental effects that cannot be avoided if a project is implemented. The proposed project was determined to have the following significant and unavoidable impacts, even with implementation of feasible mitigation measures. Each of these impacts is equally applicable to the project variant.

#### **A. Cultural Resources**

1. Impact CP-1.C. The proposed project and project variant would cause a substantial adverse change in the significance of the Market Street Cultural Landscape District as a designed landscape associated with the Market Street Redevelopment Plan.

#### **Mitigation Measure M-CP-1a: Prepare and Submit Additional Documentation for the Market Street Cultural Landscape District**

The project sponsor shall prepare Historic American Landscape Survey (HALS) documentation of the Market Street Cultural Landscape District to level 1 standards. The objective of the documentation shall be to record the extant character-defining cultural landscape features, spatial arrangement, and setting of the resource. The project sponsor shall retain a professional who meets the Secretary of the Interior's Qualification Standards for Architectural Historian or Historian (36 CFR, Part 61) and a photographer with demonstrated experience in HALS/Historic American Building Survey (HABS) photography to prepare written and photographic documentation for the Market Street Cultural Landscape District. The HALS documentation package for the Market Street Cultural Landscape District shall be reviewed and approved by the planning department's preservation staff prior to issuance of an excavation permit for the proposed project or commencement of construction. The documentation shall consist of the following:

- HALS-level Photographs:\* HALS standard large-format photography shall be used to document the Market Street Cultural Landscape District and surrounding context. The scope of the photographs shall be reviewed and approved by the planning department's preservation staff for concurrence, and all photography shall be conducted according to the current National Park Service HALS standards. Photographs for the dataset shall include: (a) contextual views of existing settings for the Market Street Cultural Landscape District in order to document the resource's overall spatial organization, circulation patterns, and physical features in relation to the surrounding built environment of downtown San Francisco; (b) general landscape and detailed views of all plazas within the Market Street Cultural Landscape District; and (c) detailed views of the resource's priority 1, priority 2, and priority 3 character-defining structures/ objects, circulation patterns, and vegetation. The photograph set shall include distant/elevated views to capture the extent and context of the resource.
  - All views shall be referenced on a key map of the property, including each photograph number with an arrow to indicate the direction of the view.

- Draft photograph contact sheets and the key map shall be provided to the planning department's preservation staff for review to determine the final number and views for inclusion in the final dataset.
- Historic photographs identified in previous studies shall also be collected, scanned as high-resolution digital files, and reproduced in the dataset.
- Written HALS Narrative Report: A written historical narrative, using the outline format, shall be prepared in accordance with the HALS Historical Report Guidelines.
- Measured Drawings: A set of measured drawings shall be prepared to document the overall design, dimensions, locations of character-defining features, circulation patterns, and spatial arrangement of the Market Street Cultural Landscape District. Original design drawings of the resource, if available, shall be digitized and incorporated into the measured drawings set. The planning department's preservation staff shall assist the consultant in determining the appropriate level of measured drawings.
- Print-On-Demand Booklet: Following preparation of the HALS photography, narrative report, and drawings sets, a print-on-demand softcover book shall be produced for the resource that compiles the documentation and historical photographs. The print-on-demand book shall be made available to the public for distribution.
- Format of Final Dataset:\*
  - The project sponsor shall submit a final/archival version of photographs, historical photographs, narrative report, drawings sets, and booklet to the Library of Congress as an official submittal through the HALS program.
  - The project sponsor shall contact the History Room of the San Francisco Public Library; Northwest Information Center; California Historical Society; Environmental Design Archives at the University of California, Berkeley; the San Francisco Planning Department; and the Architectural Archives at the University of Pennsylvania to inquire whether the research repositories would like to receive a hard or digital copy of the final dataset. Labeled hard copies and/or digital copies of the final book, containing the photograph sets, narrative report, and measured drawings, shall be provided to these repositories in their preferred format.
  - The project sponsor shall prepare documentation for review and approval by the planning department's preservation staff, along with the final HALS dataset, that outlines the outreach, response, and actions taken with regard to the repositories listed above. The documentation shall also include any research conducted to identify additional interested groups and the results of that outreach. The project sponsor shall make digital copies of the final dataset, which shall be made available to additional interested organizations, if requested.

### **Mitigation Measure M-CP-1b: Develop and Implement an Interpretive Program**

The project sponsor shall develop an interpretive program that commemorates the history of Market Street, focusing on its significant association with the Market Street Redevelopment Plan design of architects John Carl Warnecke and Mario Ciampi and landscape architect Lawrence Halprin. To contextualize the Market Street Redevelopment Plan design, interpretive materials shall also include

context themes related to the Market Street Cultural Landscape District's additional reasons for significance (e.g., Market Street's role as San Francisco's main circulation artery and facilitator of urban development, Market Street's role as a venue for civic engagement in San Francisco). Interpretive materials shall also be informed by historic context studies of the design work of architects John Carl Warnecke and Mario Ciampi and landscape architect Lawrence Halprin. The content of the studies shall include, but not be limited to, the respective designer's biography, design process, and overall body of work (with a focus on Bay Area projects) as well as the social and cultural context of post-World War II San Francisco Bay Area that influenced the designer's career in relationship to this district. The context studies shall also include a list of known projects in the Bay Area (buildings and/or landscapes) designed by the respective designer. The project sponsor shall retain a qualified consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History or History to develop an interpretive program that conveys the historic context themes listed above. The selected consultant preparing the context study of Lawrence Halprin shall have a demonstrated specialization in landscape design history. In consultation with the project sponsor and the planning department, the qualified consultant shall prepare an interpretive plan that describes the general format, locations, materials, and content of the full interpretive program. The interpretive plan shall be reviewed and approved by the planning department's preservation staff prior to the issuance of an excavation permit for the proposed project or commencement of construction. The interpretive plan shall include, at a minimum, the following interpretive projects, methods, and materials:

- **Temporary Public Exhibition:**\* The project sponsor shall hire a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards and a professional exhibition designer to prepare an exhibition for public display in venues physically proximate to Market Street, such as the San Francisco Public Library; California Historical Society; San Francisco Bay Area Planning and Urban Research Association; American Institute of Architects, San Francisco; or a similar space within an educational or civic organization. The qualified historian(s), working in cooperation with professional exhibit designer(s), shall craft a public exhibition about the significant history of the resource using, at a minimum, the HALS documentation identified above and the existing Better Market Street Cultural Landscape Evaluation (CLE). In consultation with the planning department, the project sponsor and consultants shall identify a minimum of one publicly accessible location for installation of the exhibition and work with the selected venue(s) to secure a commitment to house the display for an agreed upon length of time; the interpretive plan shall include documentation of this commitment and be submitted for review and approval to the planning department's preservation staff prior to the issuance of an excavation permit for the proposed project or commencement of construction. If the required documentation shows that a good-faith effort was put forward by the project sponsor to locate an appropriate display location but no commitment could be procured, then the project sponsor shall consult with the planning department's preservation staff and the qualified consultants mentioned above to discuss an alternative temporary installation of the exhibition at the project site where it shall be visible and accessible to the public and maintained for the duration of the construction process.
- **Educational Website:**\* The project sponsor shall hire a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards, working in cooperation with professional website designers, to prepare a Better Market Street

educational webpage about the significant history of the resource using, at a minimum, the HALS documentation identified above and the existing Better Market Street CLE. The project sponsor shall house and maintain the webpage in perpetuity on the project sponsor's website (<http://www.sfpublicworks.org/projects>), with links to the HALS documentation and other interpretive materials outlined in the project mitigations. A template webpage for the project website shall be reviewed and approved by the planning department's preservation staff prior to the issuance of any site or construction permits.

- **Interpretive Signage:**\* The project sponsor shall incorporate between six and 10 permanent interpretive markers or signs into the design of the proposed project that interpret the significant history of the resource. The markers shall be located within the project footprint (on Market Street between Steuart Street and Octavia Boulevard), and the content shall relate to the specific locations of the markers/signs within the corridor. The project sponsor shall work with qualified architectural historians or historians who meet the Secretary of the Interior's Professional Qualification Standards, professional graphic designers, and signage fabricators to determine the designs, placement locations, and fabrication specifications of the interpretive signage within the project corridor. The project sponsor shall submit for review and approval an outline of the proposed permanent interpretive signage to the planning department's preservation staff as part of the interpretive plan before issuance of any site or construction permits for the proposed project.

\*Following approval of the interpretive plan by the planning department, and working with the project sponsor and technical professionals identified above, the qualified historians shall then develop detailed interpretive content and applicable design specifications for the public exhibition, educational website, and interpretive signage. The planning department's preservation staff shall review and approve the text, images, and applicable design specifications prior to the production and installation of the interpretive materials and prior to substantial completion of the proposed project. Implementation of the interpretive plan can occur after construction has commenced but must be fully implemented within 2 years of final completion.

#### **Mitigation Measure M-CP-1c: Hold Public Commemorative and Educational Program Series**

The project sponsor shall develop and implement a public educational event series to engage community members and pay tribute to the Market Street Redevelopment Plan design. The program series shall be developed in collaboration with a qualified consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural Historian or Historian and a professional public arts programmer or partner arts institution. The selected arts programmer or partner institution shall have experience developing concepts for, promoting, and implementing largescale and site-specific public events. The program series shall include three to five public programs to tell the story of development of the Market Street Redevelopment Plan. Programs may include panel discussions and lectures with scholars and designers; collaborative artistic performances, such as re-enactment of Lawrence and Anna Halprin's RSVP cycles; walking tours; parades; and related activities on Market Street. The planning department's preservation staff shall review and approve a preliminary schedule of the program series before the content and participants are finalized. The program series must occur prior to issuance of an excavation permit for the proposed project or commencement of construction. All programs held as part of the program series

shall be recorded by a professional videographer, and the recordings shall be made available on the educational website specified under M-CP-1b.

These measures would lessen the project's impact in accordance with DEIR pp. 4.A -101, but the impact would remain significant and unavoidable.

2. Impact C-CP-1. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects in the city, would result in a cumulatively considerable contribution to a significant cumulative impact on the Market Street Cultural Landscape District but not on any other historic architectural resources.

**Mitigation Measures M-CP-1a through M-CP-1c above (see above).**

These measures would lessen the project's contribution to the impact in accordance with DEIR pp. 4.A-65 to 4.A-66, but the cumulative impact would remain significant and unavoidable.

**B. Transportation and Circulation**

1. Impact TR-1. Construction of the proposed project and project variant could result in substantial interference with transit, pedestrian, bicycle, or vehicle circulation, as well as accessibility to adjoining areas, and potentially hazardous conditions.

**Mitigation Measure M-TR-1: Construction Management Plan – Additional Measures**

As part of the proposed project's construction management plan, the project sponsor shall require additional measures to further minimize disruptions to transit, bicyclists, and pedestrians during project construction. The additional measures shall include, but not be limited to, the following:

- Establish Temporary Transit-only Lanes and Extend Bus Zones on Mission Street during Detours - When detours are implemented, SFMTA shall implement additional transit priority features, such as all-day transit-only lanes and extended bus zones on Mission Street, to accommodate the increased level of bus service on streets adjacent and parallel to Market Street during construction. Full or partial temporary restrictions may be implemented on Mission Street between 11th and Steuart streets. The temporary restrictions would permit only public transit, taxis, and commercial vehicles on Mission Street in the eastbound and/or westbound directions. The temporary restrictions could be implemented under the following conditions: (1) at least one travel lane is closed on Mission Street between 11th and Steuart streets and that travel lane closure results in only one open lane either in the eastbound or westbound direction or (2) there is construction activity on Market Street in the project corridor that would restrict transit operations. If implemented due to condition #1, the temporary restrictions may apply to the block(s) on Mission Street where the travel lane closure is occurring and up to two blocks adjacent to the affected block(s) in the eastbound and westbound directions. If implemented because of condition #2, the temporary restrictions may apply to the block(s) on Mission Street where Muni routes would be diverted because of restrictions on transit operations on Market Street. In addition, if implemented, the temporary restrictions shall be in place only during the above-mentioned

conditions. When such conditions no longer exist, the temporary restrictions shall be removed.

- Active Monitoring of Detours – When detours are implemented, SFMTA shall require that police officers or parking control officers monitor critical locations along the detour to promote unobstructed travel by vehicular traffic, transit, and people walking and bicycling
- Coordinated Construction Management Plan – If construction of the proposed project is determined to overlap with construction of any nearby project(s) involving temporary travel lane closures or temporary sidewalk closures and/or using the same truck access routes in the project vicinity, the SFMTA shall require that construction contractor(s) consult with various city departments, as deemed necessary by the SFMTA, Public Works, and the Planning Department, to develop a Coordinated Construction Management Plan and minimize the severity of any disruptions of access to land uses and transportation facilities.
- Emergency Access Response Plan – SFMTA shall require that contractor(s) submit a project corridor segment-specific emergency access response plan as part of compliance with bid specifications. This plan shall include fire department and emergency service access to construction areas and maintainability of access of emergency services such as fire hydrants
- Carpool, Bicycle, Walk and Transit Access for Construction Workers – The construction contractor(s) shall include methods to encourage carpooling, bicycling, walking, and transit access to the project corridor by construction workers (such as providing secure bicycle parking spaces, participating in free-to-employee and employer ride matching program from [www.511.org](http://www.511.org), participating in emergency ride home program through the City of San Francisco [[www.sferh.org](http://www.sferh.org)], and providing transit information to construction workers).
- Construction Coordination with Adjacent Businesses – During construction of the proposed project, access to all abutting businesses shall be maintained either through the existing or a reduced sidewalk area or via temporary access ramps. Signs shall be installed indicating that the businesses are “open during construction.” All temporary access ramps shall be in compliance with the ADA.
- Project Construction Updates for Adjacent Businesses and Residents – To minimize construction impacts on access for nearby institutions and businesses, the project sponsor shall provide adjacent and nearby businesses and residents with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities, travel lane closures, and lane closures. At regular intervals to be defined in the construction management plan, a regular email notice shall be distributed by the project sponsor that shall provide current construction information of interest to adjacent businesses and residents, as well as contact information for specific construction inquiries or concerns.

This measure would lessen the project’s impact in accordance with DEIR pp.4.B-50 to 4.B-51, but the impact would remain significant and unavoidable.

2. Impact C-TR-1. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative construction-related transportation impacts. See Mitigation Measure M-TR-1 above. This measure would lessen the project’s contribution but the contribution would remain cumulatively considerable.

**Mitigation Measure M-TR-1: Construction Management Plan – Additional Measures** (see above).

This measure would lessen the project’s contribution to the impact in accordance with DEIR pp.4.B-94 to 4.B-95, but the cumulative impact would remain significant and unavoidable

3. Impact C-TR-4. The proposed project and project variant, in combination with past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative transit impacts related to transit operations on the Muni 27 Bryant but would not contribute considerably to significant cumulative transit impacts on other local and regional routes.

No feasible mitigation has been identified. However, the SFMTA is currently investigating possible changes to the Muni 27 Bryant route as part of the 27 Bryant Transit Reliability Project and the planned improvements to Fifth Street to enhance this route’s operations. Consequently, this impact remains significant and unavoidable.

**C. Noise and Vibration**

1. Impact C-NO-1. Construction activities for the proposed project and project variant, in combination with other past, present, and reasonable future projects in the city, would result in a substantial temporary increase in noise or noise levels in excess of the applicable local standards.

**Mitigation Measure M-NO-1 (see above under Section III).**

This measure would lessen the project’s contribution to the impact in accordance with DEIR pp. 4.C-71, but the cumulative impact would remain significant and unavoidable.

**SECTION V. Evaluation of Project Alternatives**

**A. Alternatives Analyzed in the FEIR**

This section describes the alternatives analyzed in the Project FEIR and the reasons for rejecting the alternatives as infeasible. CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a “No Project” alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project.

An EIR must “consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation...Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (CEQA Guidelines at 15126.6).

Where a lead agency has determined that, even with the adoption of all feasible mitigation measures, a proposed project would still cause one or more significant environmental impacts that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. An alternative may be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project. Thus, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" of a project (City of Del Mar, 133 Cal. App. 3d 417; see also Sequoyah Hills, 23 Cal. App. 4th 715).

The Planning Department considered a range of alternatives in Chapter 6 of the FEIR. The FEIR analyzed the No Project Alternative, the Full Preservation Alternative, two Partial Preservation Alternatives, and the Core Elements Alternative. Each alternative is discussed and analyzed in these findings, in addition to being analyzed in Chapter 6 of the FEIR. The Planning Commission certifies that it has independently reviewed and considered the information on the alternatives provided in the FEIR and in the record. The FEIR reflects the Planning Commission's and the City's independent judgment as to the alternatives. Public Works finds that the Project provides the best balance between satisfaction of Project objectives and mitigation of environmental impacts to the extent feasible, as described and analyzed in the FEIR.

## **B. Reasons for Approving the Project**

The following are based on those objectives presented in the DEIR that point to specific positive outcomes and are not general statements of policy intent.

- *Provide facilities that are designed to reduce the number of traffic fatalities, collisions, and severe injuries to the extent feasible:*
  - Correct Market Street's existing design's lack of accommodation for bicycles by providing a bicycle facility that is designed to reduce the number of collisions involving bicycles, as much as feasible, from Steuart Street to Octavia Boulevard
  - Reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible by excluding private vehicles, separating out bicycles, and providing an appropriate pedestrian thoroughway with improved (i.e., reduced) crossing distances
- *Correct the barriers that Market Street's existing design poses to accessibility by providing an accessible sidewalk.*
- *Optimize the surface public transit system's capacity and travel times in the project corridor and vicinity.*
- *Replace infrastructure when nearing the end of its useful life on this section of Market Street to keep people, goods, and City and County of San Francisco (City) services moving.*
- *Ensure that all improvements and plans are coordinated with urban redevelopment efforts to foster an economically productive, healthy, and resilient corridor:*
  - Correct Market Street's existing design's problems arising from wide paved areas without any dedicated use by maximizing the reuse of underutilized street space in order to encourage the activation of public spaces



- Correct Market Street’s existing design’s arboricultural deficiencies by replanting a broader range of trees using improved arboricultural practices
- Install high-quality materials fitting for the city’s pre-eminent ceremonial street.
- Provide commercial loading zones that do not impede or introduce new barriers to the movement of goods and people along Market Street.

### C. Evaluation and Rejection of Project Alternatives

CEQA provides that alternatives analyzed in an EIR may be rejected if "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible ... the project alternatives identified in the EIR." (CEQA Guidelines § 15091(a)(3)). Public Works has reviewed each of the alternatives to the Project as described in the FEIR that would reduce or avoid the impacts of the Project and finds that there is substantial evidence of specific economic, legal, social, technological and other considerations that make these Alternatives infeasible, for the reasons set forth below. The Alternatives also are rejected for the reasons specified above in Subsection B (Reasons for Approving the Project) and in Section VI (Statement of Overriding Considerations).

In making these determinations, Public Works is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." Public Works is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project, and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

The alternatives are briefly described in this section. For a more thorough description, refer to the DEIR. The following alternatives were fully considered and compared in the FEIR:

#### 1. Alternative A: No Project Alternative

CEQA requires that analysis of the No-Project Alternative document existing conditions at the time the notice of preparation was published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (CEQA Guidelines section 15126.6(e)(2)).

Under the No-Project Alternative, the project corridor would remain in its current condition. The roadway configuration; access for private vehicles; traffic signals; surface transit, such as Muni service and infrastructure; bicycle facilities; pedestrian facilities; streetscapes; commercial and passenger loading; vehicular parking; and utilities would remain in their current conditions.

Routinely scheduled maintenance activities for existing streetscape elements (such as tree trimming) and limited physical changes related to operational needs and emergency repairs of the existing transit infrastructure would continue to occur. In addition, planned/approved projects or

activities would be implemented within, or would overlap a portion of the project corridor, resulting in some degree of physical change on Market Street.

Public Works rejects the No Project Alternative as infeasible because it would fail to meet the Project Objectives and the City's policy objectives for the following reasons:

- 1) The No Project Alternative would not meet any of the Project Sponsor's or City's objectives;
- 2) The No Project Alternative would be inconsistent with key goals of the City's General Plan with respect to the Transportation Element, the Transit First Policy and Vision Zero.
- 3) The No Project Alternative would leave the Project Area physically unchanged, and thus would not achieve any of the objectives regarding place, mobility or economic development. Necessary safety improvements including the sidewalk-level bikeway, would not be constructed.
- 4) The No Project Alternative would not achieve necessary improvements related to the condition of the existing infrastructure of Market Street, e.g. traffic signals in poor repair.

In addition, with no construction, the No Project Alternative would not create new job opportunities for construction workers.

For the foregoing reasons and other reasons specified in this Subsection C, Public Works rejects Alternative A.

## **2. Alternative B: Full Preservation Alternative**

The Full Preservation Alternative would avoid significant impacts to the Market Street Cultural Landscape Historic District by substantially reducing the scope of proposed project changes such that several priority 1 character-defining features of the landscape district would remain intact. Alternative B would omit many project-related alterations to physical features of Market Street. Accordingly, transit stop spacing and service, bicycle facilities, and commercial and passenger loading facilities would be similar to existing conditions. The F-Loop would not be constructed under this Alternative. Similarly, Path of Gold light standards would remain as existing. Alternative B would retain all existing curblines as well as all brick sidewalks and plazas. Existing trees in poor condition would be replanted with new trees to preserve the Platanus monoculture, selecting from one of two varieties, similar in character to the trees that would be removed but with greater disease tolerance. This alternative would include the same roadway access changes for private vehicles and changes to on-street parking as the proposed project. This Alternative has been identified as the overall environmentally superior alternative.

Public Works rejects Alternative B because it would not eliminate all significant and unavoidable impacts of the Project and it would not meet the Project Objectives or the City's policy objectives for reasons including, but not limited to, the following:

- 1) Alternative B would not provide facilities that are designed to reduce the number of traffic fatalities, collisions, and severe injuries to the extent feasible, a basic objective of the EIR. Therefore, Alternative B does not fully support the City's Vision Zero policy to eliminate all traffic fatalities and severe injuries by 2024.
- 2) Alternative B would not provide a bicycle facility east of 8<sup>th</sup> Street. Although private vehicles would be restricted, bicycles would continue to share the curb lane with transit, paratransit, delivery vehicles, and taxis. None of the existing conflicts between bicycles and these other vehicles would be eliminated. Therefore, Alternative B does not meet basic objectives under Mobility.
- 3) Alternative B would not make Market Street the signature sustainable street in San Francisco. It would not renew the streetscape nor maximize the reuse of underutilized street space to encourage activation of public spaces.
- 4) Alternative B would not provide an accessible sidewalk along Market Street that meets current ADA standards or Public Works Order 200369 "Standard Paving Materials in San Francisco's Public Rights-of-Way." Therefore, Alternative B does not meet basic objective under Place.
- 5) Alternative B would not provide diversity in tree species. Therefore, Alternative B does not provide for a healthy urban forest.
- 6) Alternative B would not provide transportation improvements that would support the Mid-Market revitalization planning effort to improve the economic health and productivity of Market Street; therefore, it does not meet the basic objective under Economic Development.
- 7) Alternative B would not construct the F-Loop. The F-Line would continue to run from Fisherman's Wharf to the Castro. Therefore, F-Line service improvements where ridership is highest would not be implemented. Also, Alternative B doesn't provide economic development in the areas that would benefit from a short-run of the F-Line, including the waterfront and Fisherman's Wharf.
- 8) Alternative B would not support planned housing and job growth in the project corridor, consistent with adopted land-use plans, because it would result in a substantially lower level of improvements to transit service to support residents, workers and visitors, relative to the proposed project. .
- 9) Alternative B would retain transit stop spacing and service similar to existing conditions and not fully implement the Transit First Policy, thereby not fully satisfying the City's Charter.
- 10) Alternative B does not optimize the surface public transit system's capacity and travel times in the project corridor, a basic objective under Mobility.

For the foregoing reasons and other reasons specified in this Subsection C, Public Works rejects Alternative B.

### **3. Alternative C: Partial Preservation Alternative 1**

Alternative C would modify/replace key components of the proposed project with other components intended to preserve and/or complement character defining features of the Market Street Cultural Landscape Historic District, but less expansively so than Alternative B. Alternative C would include more alterations to Market Street than Alternative B, but different in number/character than those associated with the proposed project. The color of sidewalk pavers would be as close as possible to the existing red brick. The size of the pavers would be uniform throughout the sidewalk. This is in contrast to the proposed project, which would use a variety of approved, accessible materials. Alternative C would replace the existing Platanus monoculture with trees of three to five genera that would have similar canopy shape and height as the existing Platanus. Although Alternative C would incorporate features intended to reference/complement certain character defining features of the landscape district (sidewalk paving and trees), it would still result in a significant and unavoidable impact to the eligible landscape district as a whole. Similar to the proposed project, Alternative C would add a sidewalk-level bikeway for the entirety of Market Street between Octavia Boulevard and Steuart Street. Alternative C would include partial restoration, reconstruction, and realignment of the Path of Gold light standards; existing traffic signals would be replaced; and transit stop spacing and service would be similar to the proposed project. The F-Loop would be constructed as part of this alternative.

Public Works rejects Alternative C because it would not eliminate all significant and unavoidable impacts of the Project and it would not meet the Project Objectives or the City's policy objectives for reasons including, but not limited to, the following:

- 1) Alternative C would implement the same color and size uniformity of sidewalk paving material as existing. This would make it difficult for people with vision disabilities to identify and navigate the various sidewalk zones. Therefore, Alternative C does not meet the objectives under Mobility.
- 2) Alternative C would restrict the different species of trees that would be planted along Market Street. Therefore, Alternative C would not provide for a healthy urban forest.

For the foregoing reasons and other reasons specified in this Subsection C, Public Works rejects Alternative C.

### **4. Alternative D: Partial Preservation Alternative 2**

Alternative D would modify/replace key components of the proposed project with the intent to preserve and/or complement character defining features of the Market Street Cultural Landscape Historic District. Alternative D would reduce impacts to the landscape district relative to the proposed project by reducing the scope of alterations/modifications to character defining features of the landscape district. Alternative D would generally retain streetscapes that would be similar to existing conditions on 22 block faces where no modifications to center boarding islands or curbside transit stops would occur. In contrast, 20 block faces of Market Street where modifications to center boarding islands and/or curbside transit stops are needed would see streetscape improvements similar to the proposed project. The existing Class II and Class III bicycle facilities would remain the same. Alternative D would include partial restoration, reconstruction, and

realignment of the Path of Gold light standards; existing traffic signals would be replaced; and transit stop spacing and service would be similar to the proposed project. The F-Loop would be constructed as part of this alternative.

Public Works rejects Alternative D because it would not eliminate all significant and unavoidable impacts of the Project and it would not meet the Project Objectives or the City's policy objectives for reasons including, but not limited to, the following:

- 1) Alternative D would not provide facilities that are designed to reduce the number of traffic fatalities, collisions, and severe injuries to the extent feasible, a basic objective of the EIR. Therefore, Alternative D does not fully support the City's Vision Zero policy to eliminate all traffic fatalities and severe injuries by 2024.
- 2) Alternative D would not provide a dedicated bicycle facility east of 8<sup>th</sup> Street. Although private vehicles would be restricted, bicycles would continue to share the curb lane with transit, paratransit, delivery vehicles, and taxis. None of the existing conflicts between bicycles and these other vehicles would be eliminated. Therefore, Alternative B does not meet basic objectives under Mobility.
- 3) Alternative D would not make Market Street the signature sustainable street in San Francisco. It would not renew the entire streetscape nor maximize the reuse of underutilized street space to encourage activation of public spaces. Instead, it would create inconsistency along the sidewalk.
- 4) Alternative D would not provide a continuous sidewalk that is fully accessible along Market Street. Only a 10 foot path would be provided on blocks where the curb line is modified. All other blocks retain the existing brick. Therefore, Alternative D does not meet basic objective under Place.
- 5) Alternative D would retain the existing monoculture of trees and not provide diversity in tree species. Therefore, Alternative D does not provide for a healthy urban forest.

For the foregoing reasons and other reasons specified in this Subsection C, Public Works rejects Alternative D.

## **5. Alternative E: Core Elements Alternative**

Alternative E was developed in recognition that some project-related effects are not directly associated with core elements of the proposed project but with associated upgrades/replacements of major infrastructure that exists beneath the roadway and sidewalk which would be replaced/upgraded as part of the proposed project. The elements of this alternative associated with roadway configuration, transit facilities and operations, and pedestrian and bicycle facilities would be the same as the proposed project. However, Alternative E would not include the sub-surface "state of good repair" infrastructure work proposed by the project. Removal of those elements would allow the core elements of the proposed project to proceed with lessened construction-related effects.

Public Works rejects Alternative E because it would not eliminate all significant and unavoidable impacts of the Project and it would not meet the Project Objectives or the City's policy objectives for reasons including, but not limited to, the following:

- 1) Alternative E would not repair or replace any of the underground infrastructure, which is either at or approaching the end of its useful life. Therefore, Alternative E does not meet a basic objective under Mobility.
- 2) Alternative E would mean paying for the project twice – the upfront construction cost and the cost to replace those improvements when the infrastructure fails. If the City does not complete the “state of good repair” scope of work now and only builds the core elements of the project, the aging infrastructure will fail and emergency repairs would be required. These repairs would be costly and would damage the improvements constructed by Better Market Street.
- 3) Alternative E does not upgrade any of the traffic signal hardware between Steuart Street and Octavia Boulevard. The existing design of the traffic signals is outdated and the infrastructure needs to be upgraded. Therefore, Alternative E does not meet a basic objective under Mobility, and could result in more impacts than the proposed project due to suboptimal signal operation.
- 4) Alternative E does not support the City’s Dig Once Ordinance, which encourages joint projects to reduce the impacts of excavation to the public.
- 5) Alternative E would not support planned housing and job growth in the project corridor, consistent with adopted land-use plans, because it would not provide the necessary infrastructure for service and capacity enhancement.
- 6) Alternative E would not integrate all transportation improvements with the Mid-Market revitalization planning effort to improve the economic health and productivity of Market Street; therefore, it does not meet the basic objective under Economic Development.

For the foregoing reasons and other reasons specified in this Subsection C, Public Works rejects Alternative E.

## **6. Alternatives considered but rejected**

The DEIR provides a list of 17 alternatives that were considered but rejected. The 17 design concepts were evaluated by the interagency team (Public Works, SFMTA, the planning department, San Francisco County Transportation Authority, and San Francisco Public Utilities Commission), based on their consistency with the proposed project’s goals and compatibility with community-identified design priorities.

Of the 17 design concepts evaluated, 13 were focused primarily on Market Street street space allocation and/or allowable operations; four introduced proposed modifications of the parallel section of Mission Street. Information about the 17 design concepts can be found in the Appendix 11 of the DEIR.

Public Works is again rejecting the alternatives for the reasons identified in the FEIR. Public Works also rejects these alternatives for the other reasons specified in this Subsection C.

## **VI. STATEMENT OF OVERRIDING CONSIDERATIONS**

Public Works finds, notwithstanding the imposition of all feasible mitigation measures, that the identified impacts related to cultural resources, transportation and circulation, and noise and vibration will remain significant and unavoidable. Pursuant to CEQA section 21081, subdivision (b), and CEQA Guideline 15093, Public Works hereby finds, after consideration of the FEIR and all other evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below independently and collectively outweigh the significant and unavoidable impacts of the Project and

is an overriding consideration warranting its approval including implementation of mitigation measures within the responsibility and jurisdiction of San Francisco Public Works and other responsible agencies. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, Public Works will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, and in the administrative record.

On the basis of the above findings, the findings in Section V.B-C, and the substantial evidence in the whole record of this proceeding, Public Works finds that there are significant benefits that support approval of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations.

Furthermore, Public Works has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technological, legal, social and other considerations.

The Project will have the following benefits:

1. The project will include elements to separate the movement of private vehicles, transit, pedestrians, and bicycles along the Market Street corridor to reduce collisions, severe injuries, and traffic fatalities by implementing vehicle restrictions on Market Street, traffic signal modifications, and upgraded pedestrian, bicycle, and transit facilities, consistent with the Vision Zero Policy and the Transit First Policy of the City's Charter.
2. The project will provide facilities that are designed to reduce the likelihood of collisions for people walking and biking by providing corner bulb-outs, implementing new signal timing, provide raised separation and buffer to separate pedestrians from the sidewalk level bikeway and provide designated places to cross the bicycle facility to reach transit stops and platforms, consistent with the Better Streets Plan.
3. The project will provide facilities that are designed to encourage active transportation and to reduce likelihood of collisions for bicyclists by providing a dedicated and separated sidewalk level bikeway along Market Street, bicycle traffic signals and bike boxes, and two-stage turn queue boxes, consistent with the San Francisco Bicycle Plan.
4. The project will improve surface transit in the project corridor and vicinity by creating Muni-only center lanes, optimizing transit stop spacing, providing Rapid and Local transit options, and implementing private-vehicle restrictions, passive-signal priority and dedicated-signal turning phases, and therefore will promote public transit and further the City's Transit First Policy and is consistent with the San Francisco Transportation Plan.
5. The project will increase capacity and improve reliability of the F-Line by constructing the F-Loop. It will provide economic development in the areas that would benefit from a short-run of the F-Line, including the waterfront and Fisherman's Wharf.
6. The project will correct the barriers along Market Street for people with disabilities by replacing the existing brick sidewalk with ADA compliant pavers.

7. The project includes high-quality materials and urban design elements for the City's pre-eminent ceremonial street, which would maximize the reuse of underutilized street space to encourage activation of public spaces.
8. The project will plant a broader range of trees to promote a healthy urban forest.
9. The project will replace critical utilities and transportation infrastructure nearing the end of its useful life to keep people, goods, and City services moving.
10. The project will improve Market Street as a destination and will provide outstanding mobility. This improvement in turn will support businesses and residents on Market Street itself and in all locations of the City that enjoy transit connections to Market Street. It will particularly benefit locations served by the F line, an essential transit service for points on the waterfront.
11. The project will improve surface transit on Market Street, supplementing subway service and making the overall system more resilient.
12. The project will generate thousands of jobs during construction. These jobs will provide employment opportunities for San Francisco residents, promote the City's role as a commercial center, and provide additional payroll tax revenue to the City, providing direct and indirect economic benefits to the City.

Having considered these benefits, Public Works finds that the benefits of the Project outweigh the unavoidable adverse environmental effects identified in the FEIR, and that the adverse environmental effects are therefore acceptable.