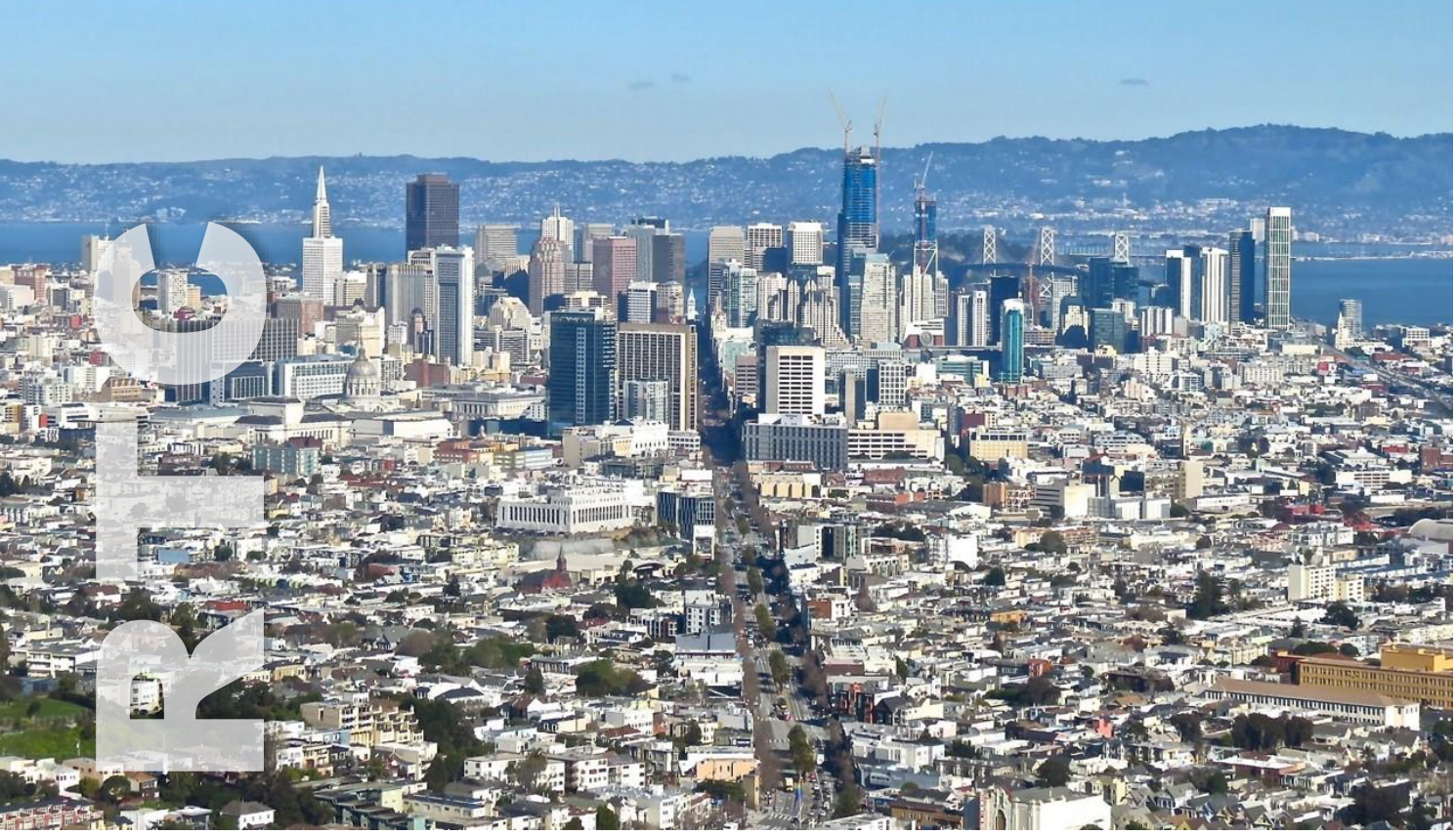


RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (VOLUME 1)

Better Market Street Project EIR

PLANNING DEPARTMENT
CASE NO. 2014.0012E

STATE CLEARINGHOUSE NO. 2015012027

SAN FRANCISCO PLANNING DEPARTMENT

Draft	Draft EIR Publication Date:	**February 27, 2019**
	Draft EIR Public Hearing Date:	**April 4, 2019**
	Draft EIR Public Comment Period:	**February 28, 2019 – April 15, 2019**
Final	Final EIR Certification Hearing Date:	**October 10, 2019**

SAN FRANCISCO
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TO: Members of the Planning Commission and Interested Parties

FROM: Lisa Gibson, Environmental Review Officer

Re: Attached Responses to Comments on Draft Environmental Impact Report Case No. 2014.0012E: Better Market Street Project

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on October 10, 2019.** The Planning Commission will receive public testimony on the Final EIR certification at the October 10, 2019 hearing. Please note that the public review period for the Draft EIR ended on April 15, 2019; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Responses to Comments document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Jenny Delumo at 415-575-9146 or jenny.delumo@sfgov.org.

Thank you for your interest in this project and your consideration of this matter.

RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (VOLUME 1)

Better Market Street Project EIR

PLANNING DEPARTMENT
CASE NO. 2014.0012E

STATE CLEARINGHOUSE NO. 2015012027

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BETTER MARKET STREET PROJECT EIR
RESPONSES TO COMMENTS

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VOLUME 2 (on enclosed CD)

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Attachment B: Comment Letters and Emails on the Draft EIR

Acronyms and Abbreviations

Caltrans	California Department of Transportation
CVC	California Vehicle Code
CCTV	closed-circuit television
CLE	Cultural Landscape Evaluation
CRHR	California Register of Historical Resources
Draft EIR	Draft Environmental Impact Report
DLOP	Driveway and Loading Operations Plan
GHG	greenhouse gas
GPS	global positioning system
HPC	Historic Preservation Commission
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NRHP	National Register of Historic Places
OCS	overhead contact system
PCOs	Parking Control Officers
proposed project	Better Market Street Project
Public Works or project sponsor	San Francisco Public Works
RPS	Renewables Portfolio Standard
RTC	Responses-to-Comments
SCMs	standard construction measures
SF Guidelines	2002 San Francisco Transportation Impact Analysis Guidelines
SFPUC	San Francisco Public Utilities Commission
SFMTA	San Francisco Municipal Transportation Agency
TMC	Transportation Management Center

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1. INTRODUCTION

A. PURPOSE OF THIS RESPONSES-TO-COMMENTS DOCUMENT

The purpose of this Responses-to-Comments (RTC) document is to present comments submitted on the Draft Environmental Impact Report (Draft EIR) for the Better Market Street Project (proposed project or project), respond in writing to comments on environmental issues, and revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code section 21091(d)(2)(A) and (B), the San Francisco Planning Department (planning department), which has considered the comments received and evaluated the issues raised, is providing written responses to each substantive environmental issue raised by the commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. In addition, this RTC document includes text changes to the Draft EIR initiated by the project sponsor and the planning department.

Since publication of the Draft EIR on February 27, 2019, the project sponsor, San Francisco Public Works (Public Works), has initiated minor revisions to the proposed project as it was described in Draft EIR Chapter 2, *Project Description*. The revisions clarify, expand, or update the information presented in the Draft EIR. The changed proposed project is referred to throughout this RTC document as the "revised proposed project." Environmental effects of the revised proposed project are analyzed in RTC Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*, Subsection D, Environmental Analysis of the Revised Proposed Project. Because the revised proposed project would be approved by decision-makers instead of the proposed project, the analysis of the revised proposed project's environmental effects compared to those of the proposed project is contained entirely in RTC Chapter 2, Subsection D.

None of the comments received or text changes provided new information that warrants recirculation of the Draft EIR. The comments and text changes did not identify or result in new significant impacts or a substantial increase in the severity of previously identified impacts. Furthermore, the comments and text changes did not identify feasible project alternatives or mitigation measures that are considerably different from those that were analyzed in the Draft EIR and/or alternatives or mitigation measures that the project sponsor has not agreed to implement.

Together, the Draft EIR and this RTC document constitute the Final Environmental Impact Report (Final EIR) for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. If the City and County of San Francisco (City) approves

the proposed project, it would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that the mitigation measures identified in the Final EIR are implemented.

B. ENVIRONMENTAL REVIEW PROCESS

The EIR process provides an opportunity for the public to review and comment on the proposed project's potential environmental effects and further inform the environmental analysis.

NOTICE OF PREPARATION AND PUBLIC SCOPING

The planning department, serving as the lead agency responsible for administering environmental review of the proposed project, published a Notice of Preparation (NOP) for an EIR and notice of public scoping meeting on January 14, 2015. The scoping period started on that date and ended on February 13, 2015. The NOP provided a project description, a map with the project location, a summary of potential environmental issues related to project implementation, and information about the public scoping meeting. The public scoping meeting was conducted on February 4, 2015, in 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. The NOP and comment letters are included in Draft EIR Appendix 1.

The NOP requested agencies and other interested parties to comment on environmental issues that should be addressed in the EIR. The comment letters received in response to the NOP, as well as the scoping meeting transcript, are available for review as part of Case File No. 2014.0012E at the planning department offices at 1650 Mission Street, Suite 400, San Francisco. Comments on the NOP and comments received at the public scoping meeting were considered in preparation of the Draft EIR (see pp. 1-2 and 1-3 of the Draft EIR for a summary of the comments received in response to the NOP).

INITIAL STUDY

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 analyzed three possible alternatives and two design options for the proposed project. The initial study is included in Draft EIR Appendix 2. The initial study examined the proposed project to identify its potential effects on the environment. The initial study found that the following environmental factors could result in significant impacts and therefore would be discussed in the EIR:

- Cultural resources
- Transportation and circulation

- Noise and vibration
- Air quality
- Wind

Between release of the initial study and publication of the Draft EIR, the project sponsor made refinements to the proposed project. These refinements consist of the following:

- Eliminating the Mission Street Alternative, which included plans for enhanced bicycle facilities and the addition of a cycle track in both directions on Mission Street.
- Adding a sidewalk-level bikeway, a bicycle facility that is physically separated from motor traffic and distinct from pedestrian use of the sidewalk, for use primarily by bicycles.
- Changing private vehicle access restrictions, including turn restrictions onto and from Market Street.
- Eliminating most of the modifications to United Nations and Hallidie plazas.
- Adding one variant to the proposed project: the Western Variant.

More information regarding changes to the proposed project since release of the initial study is provided in Draft EIR Chapter 4, *Environmental Setting and Impacts*.

DRAFT EIR AND PUBLIC COMMENT PERIOD

The planning department published the Draft EIR for the proposed project on February 27, 2019, and circulated the Draft EIR to local, state, and federal agencies as well as interested organizations and individuals for a period of 47 days (February 28, 2019, to April 15, 2019). The Draft EIR and NOA are posted electronically on the City's website (http://sf-planning.org/environmental-impact-reports-negative-declarations), and hard copies are available for public review by request at the Planning Information Center, 1650 Mission Street, San Francisco.

On February 27, 2019, the planning department also distributed NOAs regarding the Draft EIR, published notification of its availability in a newspaper of general circulation in San Francisco, posted the NOA at the San Francisco County Clerk's office, and posted notices along the project corridor. The distribution list for the Draft EIR, as well as all documents referenced in the Draft EIR, is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103 (as part of File No. 2014.0012E).

During the public review period, the planning department conducted a public hearing to receive verbal comments on the Draft EIR. The public hearing was held before the San Francisco Planning Commission on April 4, 2019, at San Francisco City Hall. Verbal comments

were received from one Planning Commission member, three organizations, and three individual persons. A court reporter at the public hearing transcribed the oral comments verbatim and prepared a written transcript (see RTC Attachment A).

During the Draft EIR public review period, the planning department received written comments from four public agencies, four organizations, and 46 individual persons. Multiple submissions were provided by some of these commenters (e.g., some commenters submitted verbal comments at the public hearing and written comments during the public review period). RTC Attachment B includes a copy of each comment letter and email submitted during the Draft EIR public review period.

RESPONSES-TO-COMMENTS DOCUMENT AND FINAL EIR

The comments received during the public review period for the Draft EIR and the minor revisions to the proposed project are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. Under CEQA Guidelines section 15201, the public may comment on any aspect of the proposed project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be "on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines section 15088 specifies that the lead agency is required to respond to comments on the major environmental issues raised during the public review period. Therefore, this RTC document focuses on the sufficiency and adequacy of the Draft EIR with respect to the significance of the environmental impacts of the proposed project that were evaluated in the Draft EIR and the revised proposed project as presented in RTC Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*.

The planning department will make available this RTC document to the San Francisco Planning Commission; agencies, neighborhood organizations, and persons who commented on the Draft EIR; and the boards, commissions, or departments that will carry out or approve the project (refer to section 2.I, *Project Approvals*, in the Draft EIR). The Planning Commission will consider the adequacy of the Final EIR—consisting of the Draft EIR and the RTC document—with respect to complying with the requirements of CEQA and Chapter 31 of the San Francisco Administrative Code. If the Planning Commission finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR, and then Public Works and San Francisco Municipal Transportation Agency (SFMTA) will consider the associated MMRP.

Consistent with CEQA Guidelines section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by

decision-makers to reduce or avoid the proposed project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings must include a Statement of Overriding Considerations for those impacts (CEQA Guidelines section 15093[b]) if the proposed project is approved. The project sponsor would be required to implement the MMRP as a condition of project approval.

C. REPORT ORGANIZATION

This RTC document is organized into the following chapters:

- *Chapter 1 – Introduction:* This chapter includes a discussion of the purpose of the RTC document, the environmental review process for the proposed project, and the organization of the RTC document.
- *Chapter 2 – Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*: This chapter provides a summary of the revisions to the proposed project initiated by the project sponsor and analyzes whether such revisions could result in any new significant environmental impacts not already discussed in the Draft EIR. This chapter also includes revisions to the text of the Draft EIR relating to changes to the proposed project initiated by the project sponsor, shown as indented text, with new text double-underlined and deletions shown with ~~strikethrough~~.
- *Chapter 3 – Public Agencies, Organizations, and Individual Persons Commenting on the Draft EIR*: This chapter provides three tables that list the public agencies, organizations, and individual persons who submitted written comments during the public review period or spoke at the public hearing for the Draft EIR. The tables identify whether the persons submitted comments in writing (i.e., via letter) during the public comment period or verbally at the Draft EIR public hearing.
- *Chapter 4 – Comments and Responses:* This chapter presents the comments on the Draft EIR excerpted verbatim from the Draft EIR public hearing transcript and written comments. The comments are organized by environmental topic area. Comments are coded as follows:
    - Comments from agencies are designated by "A-" and an acronym for the agency's name.

- Comments from non-governmental organizations are designated by "O-" and an acronym for the organization's name.
- Comments from individuals are designated by "I-" and the commenter's last name.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comments and clarify or augment information in the Draft EIR, as appropriate. The responses provide clarification of the Draft EIR text and, in some cases, also include revisions or additions to the Draft EIR. Revisions to the text of the Draft EIR are shown as indented text, with new text double-underlined and deletions shown with ~~strikethrough~~. Corrections and/or clarifications to the Draft EIR presented in the responses are repeated in Chapter 5, *Draft EIR Revisions*.

- *Chapter 5 – Draft EIR Revisions*: This chapter includes all changes to the Draft EIR text and graphics noted in the responses to the comments. Staff-initiated text changes are highlighted with an asterisk (*) in the margin to distinguish them from text changes in response to comments. Revisions and clarifications to Draft EIR Chapter 2, *Project Description*, and relevant environmental impact analyses and mitigation measures are presented in this chapter (new text is double-underlined and deletions are shown in ~~strikethrough~~). The text revisions clarify, expand, or update the information presented in the Draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR or any substantial increase in the severity of an impact identified in the EIR or the initial study prepared for the project.
- *Attachments:* The following attachments (called "attachments" to distinguish them from the Draft EIR appendices) are included as part of this document:
  - Attachment A: Planning Commission Hearing Transcript
  - Attachment B: Comment Letters and Emails on the Draft EIR

2. PROJECT DESCRIPTION AND MITIGATION MEASURE REVISIONS, AND THE REVISED PROPOSED PROJECT AND MITIGATION MEASURE ANALYSIS

A. INTRODUCTION

Since publication of the Draft EIR on February 27, 2019, the project sponsor has initiated minor revisions to the proposed project as it was described in Draft EIR Chapter 2, *Project Description*. This chapter summarizes these minor revisions, describes updates to the text in the Draft EIR (new text is double-underlined and deletions are shown in ~~strikethrough~~), and describes the environmental impacts of the revisions. Draft EIR text revisions are presented in this chapter only where they have been made specifically in Chapter 2, *Project Description*, and in the text of the mitigation measures; text revisions in other portions of the Draft EIR that are updated as a result of these changes are presented in Chapter 5, *Draft EIR Revisions*.

The revisions clarify, expand, or update the information presented in the Draft EIR. The revisions do not provide new information that would result in any new significant impact not already identified in the EIR or any substantial increase in the severity of an impact identified in the EIR or the initial study prepared for the project, and therefore recirculation of the EIR is not required. Mitigation measures identified in the Draft EIR would continue to be required in order to reduce or avoid significant environmental impacts. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the Draft EIR.

Section 15088.5 of the CEQA Guidelines requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the Draft EIR but before certification. The CEQA Guidelines state that information is "significant" if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

Section 15088.5 further defines "significant new information" that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or identification of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines Section 15088.5(b) states that

recirculation is not required if "new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

B. SUMMARY OF PROJECT DESCRIPTION REVISIONS

The minor revisions to the proposed project and the Western Variant consist of the following:

- Proposed new northbound Muni-only lane, shifted track alignment, and transit boarding island on 11th Street under the project and the Western Variant and other minor project corridor boundary revisions;
- Refined commercial and passenger loading zones and vehicular parking;
- Proposed new transit service concept as part of the proposed project under consideration by SFMTA that would have the westbound (outbound) 5 Fulton and the 9 San Bruno routes stop at the curbside stop between O'Farrell and Stockton streets. This option would require the proposed curbside stop on the north side of Market Street between O'Farrell and Stockton streets to be lengthened by approximately 40 feet; and
- Refinement to Mitigation Measure M-TR-1, Construction Management Plan – Additional Measures, which specifies that transit-only lanes on Mission Street would have a minimum width of 11 feet during detours, and temporary restrictions, permitting only public transit, taxis, and commercial vehicles on Mission Street, could be implemented during construction.

As described below, certain aspects of the proposed project are superseded and replaced by the minor revisions presented in this chapter; all other aspects of the project description remain unchanged, as presented in Draft EIR Chapter 2, *Project Description*. Similarly, the analyses of the environmental effects of the minor project revisions presented in this chapter augment the relevant analyses presented in the Draft EIR such that the environmental effects of the proposed project with the project refinements incorporated are fully covered by the analyses in this chapter together with the analyses in Draft EIR Chapter 4, *Environmental Setting and Impacts*.

The sections below evaluate whether any of the minor project revisions would result in any changes to the impact conclusions previously identified in the Draft EIR and whether any new or modified mitigation measures would be required. The analysis concludes that the minor project revisions would not result in any new or more severe impacts and that all of the mitigation measures identified in the Draft EIR would still apply to the proposed project with the project revisions incorporated. Text changes to reflect the project refinements as well as any revisions to the previous analysis are included below and in RTC Chapter 5, *Draft EIR Revisions*.

C. NEW NORTHBOUND MUNI-ONLY LANE, SHIFTED TRACK ALIGNMENT, AND TRANSIT BOARDING ISLAND ON 11TH STREET AS WELL AS OTHER MINOR PROJECT CORRIDOR BOUNDARY REVISIONS

DESCRIPTION

The proposed project analyzed in the Draft EIR included minor transportation or streetscape improvements on 11th Street. The revised proposed project includes a new northbound Muni-only lane, shifted track alignment, and transit boarding island on 11th Street under the project and the Western Variant. In addition, the Western Variant would also include a new F Market & Wharves Historic streetcar line turnout on Market Street at 11th Street to allow westbound F Market & Wharves streetcars to turn directly onto southbound 11th Street.

The project corridor boundary analyzed in the Draft EIR is shown in Draft EIR Chapter 2, *Project Description*, Figure 2-1, p. 2-3, as well as in other figures throughout the Draft EIR. As a result of the proposed improvements on 11th Street under the revised proposed project, the revised project corridor boundary was expanded compared to the project corridor boundary analyzed in the Draft EIR. Specifically, the revised project corridor boundary would extend approximately 155 feet south on 11th Street relative to the project corridor boundary analyzed in the Draft EIR. The revised project corridor boundary would also include other minor expansions along the project corridor (e.g., at the intersection of Gough Street and Haight Street, Eighth Street just south of Market Street, and the intersection of Bush and Battery streets). The revised project corridor boundary is shown in Revised Figure 2-1 in RTC Chapter 5, *Draft EIR Revisions*. Similarly, other Draft EIR figures were revised to show the revised project corridor boundary and are included at the end of RTC Chapter 5.

DRAFT EIR REVISIONS

The following figures have been revised to show the revised project corridor boundary; the revised figures are provided in Chapter 5, *Draft EIR Revisions*.

- Figure 2-1 on Draft EIR p. 2-3
- Figure 2-2 on Draft EIR p. 2-15
- Figure 2-3 on Draft EIR pp. 2-23 through 2-41
- Figure 2-5 on Draft EIR p. 2-47
- Figure 2-6 on Draft EIR p. 2-53
- Figure 2-7 on Draft EIR p. 2-57

- Figure 2-8 on Draft EIR p. 2-67
- Figure 2-9 on Draft EIR p. 2-79
- Figure 2-10 on Draft EIR p. 2-81

The third paragraph on Draft EIR p. 2-19 has been revised as follows:

> As shown in Figure 2-8, p. 2-67, Market Street has a limited number of designated on-street commercial and passenger loading bays, some with or near curb cuts. Within the project corridor, there are 23 existing loading bays on Market Street between Steuart Street and Octavia Boulevard, 20 of which are for commercial loading only; three are for a mix of passenger and commercial loading. Commercial loading bays on Market Street are restricted to commercial vehicles with six wheels or more. They have a 30-minute time limit but are unmetered. Paratransit vehicles may use all loading bays along Market Street. In current practice, paratransit vehicles load from the bicycle and travel lanes along much of Market Street. The length of the existing loading bays ranges between 40 and 173 feet. There are 11 bays on the north side of the street and 12 bays on the south side of the street. On-street commercial loading spaces are also provided on streets north and south of Market Street to allow commercial vehicles (typically trucks and service vehicles) to park along the curb to unload or load goods. In addition, there is one loading bay on the west side of Valencia Street. Furthermore, there are three loading bays on the east side of 11th Street.

The first and second paragraphs on Draft EIR p. 2-20 have been revised as follows:

> Existing on-street parking is not permitted on Market Street east of Octavia Boulevard, with the exception of six metered parking spaces on the north side of Market Street between Steuart and Spear streets. Existing on-street metered parking is available on adjacent cross streets.
>
> Existing on-street parking is available on both sides of the segment of Valencia Street between Market and McCoppin streets. Twelve existing motorcycle parking spaces are available on the east side of 11th Street.

The third paragraph on Draft EIR p. 2-51 has been revised as follows:

> **Muni-only Lanes**
>
> The proposed project would generally convert the existing center lanes on Market Street from *transit*-only lanes to *Muni*-only lanes. East of Third Street, the proposed project would convert the existing center lanes on Market Street from general purpose lanes to Muni-only lanes. In addition, a new northbound Muni-only lane would be created on 11th Street, extending approximately 155 feet south of Market Street. Between 12th and Gough streets, the eastbound lane would be converted from a general purpose lane to a

Muni-only lane. A new Muni-only lane would be created on southbound Charles J. Brenham Place in association with the proposed F-loop.

The third paragraph on Draft EIR p. 2-52 has been revised as follows:

The F-loop would be in addition to the streetcar tracks in the travel lanes of 11th Street between Market and Mission streets that currently allow streetcars to turn around and layover. The proposed project would shift the track alignment slightly north and slightly west on 11th Street ~~not affect these tracks~~.

The second paragraph on Draft EIR p. 2-55 has been revised as follows:

The proposed project would increase the length and width of existing center transit boarding islands to meet ADA standards and better accommodate existing and anticipated future increases in Muni passenger volumes. Some existing center transit boarding islands would be removed or relocated. On remaining islands, the project would construct ramps for people with disabilities to access the F-Line. Specifically, the project would increase the length of islands to up to 210 feet (compared with 110 to 120 feet for typical existing islands). The project would increase island width up to a total of 9.1 feet (compared with 6.5 feet for typical existing islands). Access to the islands would continue to be via marked crosswalks. The project would include the installation of railings between the boarding lane and the curbside travel lane. Furthermore, the project would construct new islands on Charles J. Brenham Place (northbound only, for Golden Gate Transit), McAllister Street (westbound only), 11th Street, and Seventh Street. The existing northbound curbside stop on 11th Street, which is separated from the curb by motorcycle parking, would be converted to a transit boarding island as part of the project.

The second and third paragraphs on Draft EIR p. 2-66 are revised as follows:

New commercial and passenger loading zones would be established where possible on adjacent cross streets and along nearby alleys by converting general on-street parking spaces to commercial loading spaces, white passenger loading zones, and blue accessible parking spaces. Commercial zones would accommodate truck loading and promote more use of the alleyways to access the rear of the buildings along Market Street. Nearby alleys could include Angelo's Alley and Jessie, Stevenson, and Annie streets. Up to ~~188~~ 198 new cross-street and alleyway commercial loading spaces would be created to provide alternative commercial loading options off of Market Street (see below for information regarding the removal of on-street parking spaces). In addition, existing parking spaces would be converted to create up to ~~46~~23 proposed new passenger loading zones (accommodating 46 vehicles) and ~~eight~~ nine new blue accessible zones on cross streets. In addition, the project would remove one passenger loading zone on the east side of 11th Street.

VEHICULAR PARKING

The proposed project would remove all parking from Market Street, which consists of about six metered parking spaces east of Spear Street. Additional loading zones on cross streets and in rear alleys, or on other streets, would result in part-time (i.e., time-of-day restricted) or all-day removal of parking spaces. The proposed project would convert ~~227~~ 243 existing on-street parking spaces on cross and side streets north and south of Market Street between Steuart and Valencia streets to commercial loading spaces. Changes to parking and loading could be implemented together across the entire corridor at the same time and before construction of the infrastructure improvements.

The third paragraph on Draft EIR p. 2-84 is revised as follows:

Like the proposed project, the Western Variant would generally convert the existing center lanes on Market Street from *transit*-only lanes to *Muni*-only lanes. Muni-only lanes permit transit and emergency vehicles at any time; taxis, paratransit vehicles, bicycles, and all other vehicles would be excluded at all times with one exception. Unlike the proposed project, the Western Variant would allow only Muni vehicles, taxis, paratransit, and emergency vehicles to continue westbound (outbound) on Market Street at Hayes Street. In addition, unlike the proposed project, the Western Variant would allow only transit vehicles, paratransit vehicles, emergency vehicles, and taxis to continue eastbound (inbound) on Market Street at 12th Street. Furthermore, as with the proposed project, the Western Variant would create a new northbound Muni-only lane on 11th Street, extending approximately 155 feet south of Market Street.

The second paragraph on Draft EIR p. 2-85 is revised as follows:

The Western Variant's transit infrastructure improvements would generally be the same as those of the proposed project: full replacement of existing Muni streetcar rail tracks on Market Street, minor adjustments to the locations of existing streetcar tracks at limited locations, and replacement of the traction power system and OCS (i.e., overhead wires) to maintain a state of good repair. In addition to the improvements described for the proposed project, the Western Variant would also include a new F Market & Wharves Historic streetcar line turnout on Market Street at 11th Street to allow westbound F Market & Wharves streetcars to turn directly onto southbound 11th Street.

ENVIRONMENTAL IMPACTS

The new northbound Muni-only lane, shifted track alignment, and transit boarding island on 11th Street as well as the other minor expansions along the project corridor would result in no changes to the assumptions, analysis, or conclusions described in the Draft EIR assessment of environmental impacts of the project as presented in Draft EIR Chapter 4, *Environmental Setting and Impacts*, and the initial study (Draft EIR Appendix 2) with respect to any resource topics

except for cultural resources, transportation and circulation, noise, air quality, and wind. The environmental impacts of the new northbound Muni-only lane, shifted track alignment, and transit boarding island on 11th Street as well as the other minor expansions along the project corridor on these resource topics are discussed below.

CULTURAL RESOURCES

The new improvements under the proposed project and the Western Variant on 11th Street as well as the other minor expansions along the project corridor would expand the project footprint. As with the original project corridor boundary, the majority of the various proposed project elements would be implemented within the operational public right-of-way. The proposed activities within the portions of the revised project corridor would be consistent in scale and nature to the proposed activities within the original project corridor boundary.

With respect to historic resources, the new improvements on 11th Street and the other minor expansions along the project corridor would expand the historic resources CEQA study area. The historic resources CEQA study area analyzed in the Draft EIR is shown in Draft EIR Section 4.A, *Cultural Resources*, Figure 4.A-1 on p. 4.A-3. The Revised Figure 4.A-1 is shown at the end of Chapter 5, *Draft EIR Revisions.* Most of the alterations to the streetscape under the revised proposed project would be new, but consistent, examples of physical change within a continuum of modifications to Market Street, as outlined in the Approach to Analysis in Draft EIR Section 4.A, *Cultural Resources*. Accordingly, the Draft EIR historic resources analysis would also apply to the revised proposed project because the physical environment and the proposed improvement program are substantially similar. Furthermore, the revised proposed project boundary would not include any additional properties that intersect with the boundary of the Market Street Cultural Landscape District or contain any of the district's character-defining features within the streetscape that may be directly affected by the revised proposed project activities. The new improvements on 11th Street would not occur within the vicinity of any historical resources that were not analyzed for potential vibration-related damage in the Draft EIR. Therefore, regardless of the new improvements on 11th Street and the other minor expansions along the project corridor, the impacts on historic resources would be the same as those presented in the Draft EIR, and the impact conclusions and significance determinations in Impacts CP-1 through CP-5, C-CP-1, and C-CP-3 would still be applicable. All of the same historical resource mitigation measures and Standard Construction Measures (SCMs) identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

With respect to archaeological resources, the new improvements on 11th Street and the other minor expansions along the project corridor would expand the archaeological resources CEQA study area. The archaeological resources CEQA study area analyzed in the Draft EIR is shown in Draft EIR Section 4.A, *Cultural Resources*, Figure 4.A-1 on p. 4.A-3. The Revised Figure 4.A-1 is

shown in RTC Chapter 5, *Draft EIR Revisions.* The excavation required for the new improvements on 11th Street would be within the average depth of excavation analyzed in the Draft EIR (i.e., 3 to 15 feet below the ground surface) and occur within the same subsurface materials as identified during the desktop geoarchaeological review performed for the proposed project. Accordingly, the Draft EIR archaeological resources, human remains, and tribal cultural resources analyses would also apply to the revised proposed project. Therefore, regardless of the new improvements on 11th Street and the other minor expansions along the project corridor, the potential to encounter archaeological resources, or human remains, or tribal cultural resources would be the same as presented in the Draft EIR, and the impact conclusions and significance determinations in Impacts CP-6 through CP-8 and C-CP-2 would still be applicable. All of the same SCMs, tribal cultural resources mitigation measure, and Standard Archaeological Measure II, Monitoring (Draft EIR Appendix 6) identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

TRANSPORTATION AND CIRCULATION

With respect to transportation and circulation, the new improvements on 11th Street would facilitate travel for northbound buses on 11th Street by providing the Muni-only lane adjacent to the new boarding island, allowing northbound buses to be better positioned within northbound 11th Street when making the right turn onto Market Street. In addition, for the Western Variant, the project refinement would include a new F Market & Wharves Historic streetcar line turnout on Market Street at 11th Street, providing easier access for westbound streetcars traveling to the 11th Street turnout and layover. These refinements would not substantially change the transit impact analysis in Draft EIR Section 4.B, *Transportation and Circulation*, Impact TR-4 on pp. 4.B-61 – 4.B-68 and the travel time changes presented in Table 4.B-4 on Draft EIR pp. 4.B-63 – 4.B-65. Therefore, with this refinement, transit impacts would be the same for the revised proposed project and the Western Variant as those presented in the Draft EIR.

The new improvements on 11th Street, particularly the conversion of the existing curbside stop to a transit boarding island, would not substantially change conditions for people walking, and conditions would remain similar to existing conditions. This refinement would not substantially change the walking/accessibility impacts presented in Impact TR-5 on Draft EIR pp. 4.B-68 – 4.B-77 or alter the impact determination, and with these refinements, the walking/accessibility impacts would be the same for the revised proposed project and the Western Variant as those presented in the Draft EIR.

The new improvements on 11th Street would generally not change bicycle conditions on 11th Street, and conditions would remain similar to existing conditions. The exception would be the addition of a boarding island on 11th Street in the northbound direction, which would isolate the bikeway from the northbound travel lanes. This would create a protected bikeway for the

length of the boarding island, resulting in an improvement relative to existing conditions. Within the segment of 11th Street that would be affected by the project refinements, northbound bicyclists on 11th Street would continue to access Market Street from a mixed-flow travel lane. The new improvements on 11th Street would not substantially change the bicycle analysis presented in Draft EIR Section 4.B, *Transportation and Circulation*, Impact TR-6 on pp. 4.B-77 to 4.B-83 or alter the impact determination, and with these refinements, the bicycle impacts would be the same for the revised proposed project and the Western Variant as those presented in the Draft EIR.

The new improvements on 11th Street would eliminate three on-street commercial loading spaces and a passenger loading/unloading zone on the east side of 11th Street between Market and Mission streets. The removal of these spaces would not substantially change the number of commercial loading spaces that the proposed project would provide on side and cross streets along the project corridor. The revised proposed project would continue to accommodate commercial deliveries and passenger loading demand on 11th Street because, under baseline-plus-project conditions, four commercial loading spaces would be provided on the west side of 11th Street between Market and Mission streets. These spaces could also be used for passenger loading/unloading (the curb parking lane on the west side of 11th Street is currently being used for construction activities). The project refinement would not substantially change the loading analysis presented in Draft EIR Section 4.B, *Transportation and Circulation*, Impact TR-7 on pp. 4.B-83 to 4.B-90 or alter the impact determination, and with these refinements, the proposed project loading impacts would be the same for the revised proposed project and the Western Variant as those presented in the Draft EIR.

These minor changes to 11th Street would not result in new or substantially different impacts with respect to the other construction-related or operational transportation impacts (i.e., vehicle miles traveled [VMT], traffic hazards, parking, and emergency vehicle access) under either baseline-plus-project or cumulative conditions as analyzed in the Draft EIR. The impact conclusions and significance determinations would remain the same.

NOISE

With respect to noise and vibration impacts, the new improvements on 11th Street would not increase the proximity of project construction or operational activities to existing or future noise- and vibration-sensitive receptors relative to what was assumed in the Draft EIR. The existing land uses along 11th Street south of Market Street include commercial and industrial land uses, which are not considered sensitive receptors. Nonetheless, the receptors identified in Draft EIR Section 4.C, *Noise*, Figure 4.C-2, p. 4.C-13, and Table 4.C-8, p. 4.C-25, are as close to noise and vibration-generating activities as possible (i.e., directly adjacent to the project corridor) and therefore are representative of other sensitive receptors that may exist along the project corridor (including along 11th Street) but which are not specifically listed. In addition, the types of activities required to construct the improvements are the same as those associated with the Market Street

improvements proposed as part of the project. Therefore, the revised proposed project would be expected to involve the same construction activities, phasing, level of construction intensity and equipment, and construction-related emissions as analyzed in the Draft EIR for the proposed project. Accordingly, the Draft EIR noise and vibration analyses would also apply to the revised proposed project. Therefore, regardless of the new improvements on 11th Street, the construction-related and operational noise and vibration levels at the closest sensitive receptors would be approximately the same as those presented in the Draft EIR and the impact conclusions and significance determinations in Impacts NO-1 through NO-4 and C-NO-1 through C-NO-3 would still be applicable. All of the same noise and vibration mitigation measures, SCMs, vibration control procedures, and other requirements identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

AIR QUALITY

With respect to air quality, the new improvements on 11th Street would not increase the proximity of project construction or operational activities to existing or future air quality-sensitive receptors relative to what was assumed in the Draft EIR. The existing land uses along 11th Street south of Market Street include commercial and industrial land uses, which are not considered sensitive receptors. Nonetheless, the receptors identified in Draft EIR Section 4.D, *Air Quality*, Figure 4.D-1, p. 4.D-6, are as close to emissions-generating activities as possible (i.e., within the project corridor buffer and/or within the Mission Street buffer) and therefore representative of other sensitive receptors that may exist along the project corridor (including along 11th Street) but are not specifically identified. Furthermore, the types of activities required to construct the improvements are the same as those associated with the Market Street improvements proposed as part of the project. Therefore, the construction assumptions used in the Draft EIR encompass construction of the new improvements on 11th Street. The revised proposed project would be expected to involve the same construction activities, phasing, level of construction intensity and equipment, and construction-related emissions as analyzed in the Draft EIR for the proposed project.

With respect to operation, the revised proposed project would not induce or generate new vehicle trips that would result in a substantial increase in VMT or associated criteria pollutant emissions compared to what was analyzed in the Draft EIR. This continues to be the case for the revised proposed project as the project changes would not affect VMT. In addition, the new improvements on 11th Street would not result in a substantial redistribution of traffic volumes, as the travel lanes on 11th Street and permitted turning movements at the intersections of 11th Street at Market Street and at Mission Street would remain similar to existing conditions. Therefore, traffic volumes for the revised proposed project are expected to remain the same as the proposed project and the health risk assessment completed for the proposed project, which

found health risks within the modeling domain[1] to be less than significant during operation, remains applicable. Accordingly, the Draft EIR air quality analysis would also apply to the revised proposed project.

Therefore, regardless of the new improvements on 11th Street, the construction-related and operational emissions at the closest sensitive receptors would be approximately the same as those presented in the Draft EIR and the impact conclusions and significance determinations in Impacts AQ-1 through AQ-4 and C-AQ-1 through C-AQ-4 would still be applicable. The same air quality mitigation measure, SCMs, and other requirements identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

WIND

With respect to wind, the new improvements on 11th Street would not result in substantially worsened wind conditions or new exceedances of the wind hazard criterion of San Francisco Planning Code section 148 relative to what was assumed in the Draft EIR. The new improvements on 11th Street would require the removal of additional street trees along the eastern side of 11th Street that were not required to be removed as part of the proposed project. However, as with the proposed project, the revised proposed project would include replacement trees that are similar in number and size to the existing street trees. Therefore, the wind study (Draft EIR Appendix 10) completed for the proposed project, which notes that the proposed project improvements are not expected to significantly alter existing wind conditions or create any wind hazard exceedances, remains applicable. Accordingly, the Draft EIR wind analysis would also apply to the revised proposed project. Therefore, regardless of the new improvements on 11th Street, the potential to substantially worsen wind speeds would be approximately the same as presented in the Draft EIR and the impact conclusions and significance determinations in Impacts WS-1 and C-WS-1 would still be applicable. The same measures that could help lower existing wind speeds at the locations where the wind hazard criterion is currently exceeded (including Fell Street to Octavia Boulevard, which is in the vicinity of 11th Street) and other requirements identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

[1] The modeling domain is the worst-case study area that was modeled for the health risk assessment. The modeling domain, which is made up of Mission Street between Eighth and Third streets, continuing to the Market Street and Third Street intersection, would experience the greatest increase in peak-hour volumes over a contiguous area and the incremental emissions from peak-hour volumes and receptor locations combine to generate the area of greatest potential incremental project risk.

D. REFINED COMMERCIAL AND PASSENGER LOADING ZONES AND VEHICULAR PARKING

DESCRIPTION

As part of the proposed project analyzed in the Draft EIR, up to 188 new cross-street and alleyway commercial loading spaces and eight new blue accessible zones on cross streets would be created. In addition, the proposed project would convert 227 existing on-street parking spaces on cross and side streets to commercial loading spaces, as discussed on Draft EIR Chapter 2, *Project Description*, p. 2-66. The revised proposed project would include the creation of up to 198 new cross-street and alleyway commercial loading spaces (10 more than the Draft EIR) and nine new blue accessible zones on cross streets (one more than the Draft EIR). In addition, the revised proposed project would convert 243 existing on-street parking spaces on cross and side streets to commercial loading spaces (16 more than the Draft EIR) and would remove one passenger loading zone on the east side of 11th Street (none assumed in the Draft EIR).

DRAFT EIR REVISIONS

The second and third paragraphs on Draft EIR p. 2-66 are revised as follows:

> New commercial and passenger loading zones would be established where possible on adjacent cross streets and along nearby alleys by converting general on-street parking spaces to commercial loading spaces, white passenger loading zones, and blue accessible parking spaces. Commercial zones would accommodate truck loading and promote more use of the alleyways to access the rear of the buildings along Market Street. Nearby alleys could include Angelo's Alley and Jessie, Stevenson, and Annie streets. Up to ~~188~~ 198 new cross-street and alleyway commercial loading spaces would be created to provide alternative commercial loading options off of Market Street (see below for information regarding the removal of on-street parking spaces). In addition, existing parking spaces would be converted to create up to ~~46~~23 proposed new passenger loading zones (accommodating 46 vehicles) and ~~eight~~ nine new blue accessible zones on cross streets. In addition, the project would remove one passenger loading zone on the east side of 11th Street.

VEHICULAR PARKING

> The proposed project would remove all parking from Market Street, which consists of about six metered parking spaces east of Spear Street. Additional loading zones on cross streets and in rear alleys, or on other streets, would result in part-time (i.e., time-of-day restricted) or all-day removal of parking spaces. The proposed project would convert

~~227~~ 243 existing on-street parking spaces on cross and side streets north and south of Market Street between Steuart and Valencia streets to commercial loading spaces. Changes to parking and loading would be implemented together across the entire corridor at the same time and before construction of the infrastructure improvements.

ENVIRONMENTAL IMPACTS

The refined commercial and passenger loading zones and vehicular parking would result in no changes to the assumptions, analysis, or conclusions described in the Draft EIR assessment of environmental impacts of the project as presented in Draft EIR Chapter 4, *Environmental Setting and Impacts*, and the initial study (Draft EIR Appendix 2) with respect to any resource topics except for transportation and circulation and air quality. The environmental impacts of the refined commercial and passenger loading zones and vehicular parking on these resource topics are discussed below.

TRANSPORTATION AND CIRCULATION

With respect to transportation and circulation, the net new increase in the number of on-street commercial loading spaces on cross and side streets under the revised proposed project, the increase in the permanent removal of on-street parking spaces on cross and side streets, and the loss of a passenger loading zone (accommodating five vehicles) on 11th Street would not substantially change the Draft EIR loading and parking analysis. Similar to the proposed project, the revised proposed project would accommodate commercial and passenger loading demand. Under the revised proposed project, loading/unloading activities would be accommodated along Market Street by replacing existing loading bays with loading zones, similar in number to the current condition (same as the proposed project). The net increase in commercial loading spaces and passenger loading/unloading zones on cross and side streets would further accommodate loading activities and remove conflicts associated with double parking within bicycle lanes, transit-only lanes, or mixed-flow travel lanes. As discussed for the proposed project, permanent removal of on-street parking would not substantially change area-wide parking conditions or result in a substantial parking deficit. Therefore, the conclusions and significance determinations in Impacts TR-7, TR-8, C-TR-7, and C-TR-8 related to loading and parking would still be applicable to the revised proposed project. In addition, these minor changes to on-street commercial loading spaces and a passenger loading zone would not result in new or substantially different impacts with respect to other construction-related and operational transportation impacts under either baseline-plus-project or cumulative conditions as analyzed in the Draft EIR. The impact conclusions and significance determinations would remain the same. The other requirements and regulations identified in the Draft EIR, such as Public Works standard construction measures and the San Francisco Regulations for Working

in San Francisco Streets, would continue to apply to the proposed project and the Western Variant with project refinements included.

AIR QUALITY

With respect to air quality, the refinements to the commercial and passenger loading zones and vehicular parking within the modeling domain along the project corridor are not anticipated to result in changes in associated emissions because, similar to the proposed project, the revised proposed project would not induce loading demand (e.g., by introducing a new land use). In addition, the new loading zones within the modeling domain would generally be located adjacent to or within the vicinity of existing loading zones and bays and, similar to the proposed project, the overall pollutant burden of the refinements to the loading zones under the revised proposed project would also be similar to the existing and no-project conditions. Therefore, the health impacts of the revised proposed project during operation would be similar to the proposed project. Accordingly, the Draft EIR air quality analysis would also apply to the revised proposed project. Therefore, regardless of the refinements to the commercial and passenger loading zones and vehicular parking, the construction-related and operational emissions at the closest sensitive receptors would be approximately the same as those presented in the Draft EIR and the impact conclusions and significance determinations in Impacts AQ-1 through AQ-4 and C-AQ-1 through C-AQ-4 would still be applicable. The same SCMs, and other requirements identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

E. NEW TRANSIT SERVICE CONCEPT FOR O'FARRELL AND STOCKTON STREETS

DESCRIPTION

The proposed Muni transit stop spacing within the project corridor is shown in Draft EIR Chapter 2, *Project Description*, Figure 2-6, p. 2-53. As shown, a westbound (outbound) curbside transit stop for the 7X line and the 6, 7, 21, and 31 local bus routes would be included under the proposed project on the north side of Market Street between O'Farrell and Stockton streets. SFMTA is analyzing a new transit service concept as part of the revised proposed project that would have the westbound (outbound) 5 Fulton and the 9 San Bruno routes stop at the proposed curbside stop between O'Farrell and Stockton streets. This would require the proposed curbside transit stop to be lengthened by approximately 40 feet. The new transit service concept would provide for a closer connection to the Central Subway Project, which is currently under construction but will be operational soon.

DRAFT EIR REVISIONS

Figure 2-6 has been revised to clarify the proposed transit service concept under consideration by SFMTA.

The third paragraph on Draft EIR p. 2-55 has been revised as follows:

> Curbside transit stops would be maintained and upgraded with railings to provide separation from new sidewalk-level bikeways. (As shown in Figure 2-4, p. 2-43, the new sidewalk-level bikeways would be constructed between curbside transit stops and the pedestrian through zone, the area intended for pedestrians on sidewalks.) Access to curbside transit stops would be via marked crosswalks. Curbside transit stops in the inbound direction, east of McAllister Street, would be able to accommodate either two or three 60-foot Muni buses. Proposed curbside transit stops would be a minimum of 8 feet wide. In addition, SFMTA is evaluating a transit service concept as part of the project that would have outbound bus route 5 and outbound bus route 9 stop at the curbside transit stop between O'Farrell and Stockton streets, which would require the proposed curbside transit stop to be lengthened by approximately 40 feet.

ENVIRONMENTAL IMPACTS

The new transit service concept at O'Farrell and Stockton streets would result in no changes to the assumptions, analysis, or conclusions described in the Draft EIR assessment of environmental impacts of the project as presented in Draft EIR Chapter 4, *Environmental Setting and Impacts*, and the initial study (Draft EIR Appendix 2) with respect to any resource topics except for transportation and circulation. The environmental impacts of the new transit service concept at O'Farrell and Stockton streets on this resource topic is discussed below.

TRANSPORTATION AND CIRCULATION

With respect to transportation and circulation, the new transit service concept at O'Farrell and Stockton streets would not substantially change the Draft EIR transit analysis. With this concept, the 5 Fulton and 9 San Bruno routes traveling in the westbound direction would leave the center Muni-only lane and maneuver to the curb stop, and then return to the center travel lane as these routes continue to the west. The additional stop and the weaving movement between the center and curb lanes for these two routes would add transit travel time to the travel times presented for the 5 Fulton and the 9 San Bruno routes in Draft EIR Section 4.B, *Transportation and Circulation*, Table 4.B-4 on pp. 4.B-63–4.B-65 for 2020 baseline plus project conditions. However, this increase would minimally affect the travel time reduction for these routes (more than four minutes, as presented in Table 4.B-4), and with implementation of the revised proposed project with the additional stop concept, transit travel times for these routes would be similar to those presented in Table 4.B-4 for the proposed project, and therefore

would decrease compared to existing conditions. The additional stop under the revised proposed project would require the proposed curbside stop on the north side of Market Street between O'Farrell and Stockton streets to be lengthened by approximately 40 feet. An on-street loading zone is not proposed on this segment of Market Street; therefore, this lengthening of the proposed stop would not affect commercial loading conditions. Therefore, the conclusions and significance determinations in Impact TR-4 and C-TR-4 would still be applicable to the revised proposed project with the additional stop concept. In addition, the new transit service concept would not result in new or substantially different impacts with respect to other construction-related and operational transportation impacts under either baseline-plus-project or cumulative conditions as analyzed in the Draft EIR. The impact conclusions and significance determinations would remain the same. The other requirements identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included. In addition, this concept would not interfere with the 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 that SFMTA is currently investigating.

F. REFINEMENTS TO MITIGATION MEASURE M-TR-1

DESCRIPTION

Mitigation Measure M-TR-1 has been revised to include temporary access restrictions that would permit only public transit, taxis, and commercial vehicles on Mission Street in order to accommodate bus detours from Market Street to Mission Street. In addition, the establishment of temporary transit-only lanes on Mission Street, as part of Mitigation Measure M-TR-1, would require restriping of the existing lanes in each direction between First and 11th streets. The restriping and extension of bus stops on Mission Street may require the temporary removal of on-street parking and commercial loading spaces on one side or both sides of the street. Up to approximately 111 on-street parking spaces and approximately 22 commercial loading spaces may be temporarily removed, all of which are currently subject to a.m. and/or p.m. peak period tow-away regulations. The SFMTA would temporarily convert a portion of the 120 remaining on-street parking spaces on this segment of Mission Street to commercial loading spaces to replace the 22 commercial loading spaces that would be temporarily removed as part of the restriping of the travel lanes.

DRAFT EIR REVISIONS

The first bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-51 has been revised as follows:

> *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, which would permit only public transit, taxis, and commercial vehicles on Mission Street in the eastbound and/or westbound directions, could be implemented under the following conditions: (1) at least one travel lane is closed on Mission Street between 11th and Steuart streets, resulting in only one open lane in either the eastbound or westbound direction, or (2) construction activity on Market Street in the project corridor restricts transit operations. If implemented because of 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.

ENVIRONMENTAL IMPACTS

Refinement of the transit-only lane width and temporary access restrictions on Mission Street in Mitigation Measure M-TR-1 would result in no changes to the assumptions, analysis, or conclusions described in the Draft EIR assessment of the environmental impacts of the project, as presented in Draft EIR Chapter 4, *Environmental Setting and Impacts*, and the initial study (Draft EIR Appendix 2), with respect to any resource topic, except for transportation and circulation. The environmental impacts on this resource topic from refinement of the transit-only lane width and temporary access restrictions on Mission Street, discussed in Mitigation Measure M-TR-1, are described below.

TRANSPORTATION AND CIRCULATION

With respect to transportation and circulation, the construction-related transportation impacts of the proposed project discussed in Impact TR-1 and Impact C-TR-1 would remain significant

and unavoidable with mitigation under baseline-plus-project and cumulative conditions, even with the revisions to Mitigation Measure M-TR-1. These changes would not affect the operational impact analysis presented in Impacts TR-2 through TR-9. In addition, Impacts C-TR-2 through C-TR-9, as well as the impact conclusions and significance determinations, would remain the same.

The removal of on-street parking and commercial loading spaces as part of the refinement of Mitigation Measure M-TR-1 under the revised proposed project would not substantially change the construction analysis of the Draft EIR. Mission Street is well served by public transit. In addition, nearby off-street parking facilities (see Draft EIR page 4.B-25 for list, including, SFMTA parking garages at Moscone Center and Sutter Stockton) are located within this segment of Mission Street. The on-street commercial loading spaces would be replaced within the same block (i.e., on the other side of the street) or within one block of the existing condition. Therefore, the temporary removal of on-street parking and commercial loading spaces would not substantially change construction-related impacts on loading and parking, as discussed on Draft EIR p. 4.B-50.

As described on Draft EIR p. 4.B-47, after final design plans for the proposed project are completed, a construction management plan would be prepared in consultation with the SFMTA. Elements would include circulation and detour routes, bus route changes and stop relocations, temporary transit priority improvements on bus detour streets, advance warning signage, construction truck routes, maintenance of access and circulation for people bicycling and walking, designation of adequate staging areas, scheduling and monitoring of construction vehicle movements, and coordination with public service providers such as fire, police, schools, hospitals, and transit.

Based on ongoing efforts by the SFMTA to develop a transit operations plan that supports the construction management plan described above, Mitigation Measure M-TR-1 was refined to include a component that would establish temporary transit-only lanes on Mission Street when detours affect Market Street transit routes. This refinement regarding implementation of full or partial temporary vehicle access restrictions under specific conditions (i.e., only buses, taxis, or commercial vehicles would be permitted on the affected segment(s) of Mission Street) was added so that travel lanes on Mission Street would be available for unimpeded bus travel, thereby minimizing increases in transit travel times for detoured routes as well as existing bus routes on Mission Street. This takes into consideration the possibility that ongoing or planned construction of development projects along Mission Street could require travel lane closures. For example, ongoing construction of the 1500 Mission Street Project (between 11th Street and South Van Ness Avenue) requires temporary closure of the westbound right-turn-only curb lane on Mission Street at the approach to South Van Ness Avenue, short-term westbound travel lane closures on Mission Street, and reconfiguration of westbound and eastbound travel lanes during lane closures. Construction of the 5M Project (the first phase broke ground in June 2019) may require temporary

travel lane closures on eastbound Mission Street during construction of the 302-unit apartment building as well as the Mary Court public park on the block bound by Mission, Fifth, Minna, and Sixth streets.

The full or partial temporary vehicle access restrictions on Mission Street refinements to Mitigation Measure M-TR-1 would not substantially change the Draft EIR construction impact analysis. The Draft EIR discusses bus route detours to other streets and the diversion of vehicles from Market Street to eastbound and/or westbound streets south of Market Street, such as Howard (westbound), Folsom (eastbound), Harrison (westbound), or Bryant (eastbound), which are generally one-way streets with multiple travel lanes. As described on Draft EIR p. 4.B-47, detours and the diversion of vehicles to other streets would result in an increase in overall vehicle congestion throughout the South of Market neighborhood as well as the transportation study area, which may lead to reduced vehicle speeds and longer peak-period queues. Diverted vehicles from Mission Street under full or partial access restrictions would not result in substantially more severe construction-related transportation impacts relative to what was disclosed in Impact TR-1 on Draft EIR pp. 4.B-45 to 4.B-52. Therefore, with these refinements to Mitigation Measure M-TR-1, the impact conclusions and significance determinations in Impact TR-1 and Impact C-TR-1 would still be applicable to the revised proposed project. Specifically, the revised proposed project would not substantially change the construction impact analysis presented in Impact TR-1 on Draft EIR pp. 4.B-45 to 4.B-52 and Impact C-TR-1 on Draft EIR pp. 4.B-94 to 4.B-95. With these refinements, construction-related transportation impacts under baseline-plus-project and cumulative conditions would remain significant and unavoidable with mitigation. The SCMs and other requirements such as the San Francisco Regulations for Working in San Francisco Streets (the SFMTA Blue Book) identified in the Draft EIR continue to apply to the proposed project and the Western Variant with project refinements included.

G. ALTERNATIVES TO THE REVISED PROPOSED PROJECT

Compared to the proposed project, the revised proposed project would not result in any significant project-level or cumulative impacts that were not previously identified in the Draft EIR. For this reason, no new alternatives need to be analyzed. The findings in Draft EIR Chapter 4, *Alternatives*, remain valid and are applicable to the revised proposed project.

H. Overall Conclusion of the Potential Environmental Impacts of the Revised Proposed Project

The revisions to the proposed project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR. The mitigation measures identified in the Draft EIR for the proposed project would continue to be required to reduce or avoid the significant environmental impacts of the revised proposed project. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the Draft EIR. Therefore, references to the proposed project in this RTC document, including Chapter 5, *Draft EIR Revisions*, shall be interpreted to include and incorporate any changes proposed by the revised proposed project, unless otherwise noted.

3. PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUAL PERSONS COMMENTING ON THE DRAFT EIR

This chapter presents the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearings on the Draft EIR. This RTC document codes the comments in the following way:

- Comments from agencies are designated by "A-" and an acronym for the agency's name.
- Comments from organizations are designated by "O-" and an acronym for the organization's name.
- Comments from individuals are designated by "I-" and the commenter's last name.

Within each category, commenters are listed in alphabetical order. In cases where commenters provided oral testimony at the public hearing and submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number (e.g., comment codes O-LOS1-1, O-LOS1-2, O-LOS2-1, and O-LOS2-2 are used to denote multiple written and verbal comments submitted by the same organization). The Planning Commission hearing transcript is included as Attachment A. Comment letters and emails received are included as Attachment B.

The tables that follow list the commenters' names, along with the corresponding commenter codes used in RTC Chapter 4, *Responses to Comments*, to denote each set of comments; the comment format; the comment date, and the response to comments codes that refer to responses to the comments received.

Table 3-1: Public Agencies that Provided Comments on the Draft EIR

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Date	Responses to Comments Codes
A-CT	California Department of Transportation District 4	Letter	4/15/19	GNE-1, TR-2
A-GGBHTD	Golden Gate Bridge Highway and Transportation District	Letter	4/11/19	GNE-1, TR-2, TR-3
A-HPC	Historic Preservation Commission	Draft EIR Hearing Letter	4/2/19	AL-1, CR-1, GNE-2, ME-3, ME-9
A-SFPC2	San Francisco Planning Commission (Kathrin Moore, Commissioner)	Draft EIR Hearing Transcript	4/4/19	CR-1, GNE-2, ME-3, ME-8, ME-9, TR-4

Table 3-2: Organizations that Provided Comments on the Draft EIR

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Date	Responses to Comments Codes
O-CRP	Climate Reality Project: SF Action Group	Letter	4/14/19	AQ-1, GE-3, GNE-1
O-SFBC1	San Francisco Bicycle Coalition	Draft EIR Hearing Transcript	4/4/19	ME-1, ME-4, TR-1, TR-9
O-SFBC2	San Francisco Bicycle Coalition	Letter	4/12/19	ME-1, ME-4, TR-4, TR-5, TR-8
O-SFTR1	San Francisco Transit Riders	Letter	3/29/19	ME-1, TR-1, TR-3
O-SFTR2	San Francisco Transit Riders	Draft EIR Hearing Transcript	4/4/19	TR-1, TR-3
O-WSF1	Walk San Francisco	Draft EIR Hearing Transcript	4/4/19	GNE-2, ME-1, ME-4, TR-1, TR-4, TR-9
O-WSF2	Walk San Francisco	Letter	4/15/19	GNE-1, ME-1, TR-1, TR-4

Table 3-3: Individual Persons Who Provided Comments on the Draft EIR

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Date	Responses to Comments Codes
I-Anne	Anne, K.M.	Letter	3/15/19	GNE-1, GNE-2, ME-1, TR-4, TR-7
I-Avallone	Avallone, Vince	Letter	3/24/19	GNE-1, ME-1, PD-1, TR-4
I-Berggren	Berggren, Christopher	Letter	3/14/19	GNE-2, ME-1
I-Bowers	Bowers, Scott	Letter	3/14/19	ME-1
I-Cauthen	Cauthen, G	Letter	3/21/19	GNE-1, GNE-2, ME-9, TR-1
I-Chetan	Chetan, M	Letter	3/9/19	ME-7
I-DeLong	DeLong, Frank	Letter	3/13/19	ME-2
I-Dora	Bo-Bora, Dora-Dora	Letter	3/13/19	ME-2
I-Doyle	Doyle, Chris	Letter	3/13/19	ME-1
I-Edington	Edington, Mary	Letter	3/13/19	TR-4
I-Esher	Esher, Susan	Letter	3/12/19	ME-7

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Date	Responses to Comments Codes
I-Flores1	Flores, Lawrence	Draft EIR Hearing Transcript	4/4/19	ME-6
I-Flores2	Flores, Lawrence	Letter	4/10/19	ME-5, ME-6
I-Folsom	Folsom, Bruce	Letter	3/14/19	GNE-1, ME-6
I-Gibson	Gibson, Joe	Letter	3/13/19	ME-7
I-Haas	Haas, Jim	Draft EIR Hearing Transcript	4/4/19	CR-1, GE-4, GNE-2, ME-1
I-Hennig	Hennig, Warren	Letter	3/13/19	ME-2
I-Hestor	Hestor, Sue C.	Letter	4/15/19	GE-4, TR-1, TR-5, TR-9
I-Hong	Hong, Dennis	Letter	4/15/19	GE-2, GE-4, GNE-1, GNE-2, ME-1, TR-4
I-Hyland	Hyland, Aaron Jon	Letter	4/15/19	AL-5, TR-4
I-Judith	Judith	Letter	3/13/19	ME-2
I-Karren	Karren, Leslie	Letter	3/25/19	GNE-2
I-Katz	Katz, Michael	Letter	4/4/19	AL-2, AL-6, AL-5, AQ-2, ME-2, ME-3, ME-6, ME-9, TR-4
I-Khristie	Khristie, Art	Letter	3/13/19	ME-3
I-Kohn	Kohn, Bob	Letter	4/1/19	ME-2
I-Magocsy	Magocsy, Mary	Letter	3/13/19	TR-2
I-Majeski	Majeski, Nicholas A	Letter	3/15/19	GE-1, ME-2
I-Maley	Maley, Ken	Letter	4/15/19	ME-3
I-Mauro	Mauro, Jacqueline A.	Letter	4/10/19	ME-1
I-McCreary	McCreary, Patrick	Letter	3/13/19	TR-4
I-Medel	Medel, Alex	Letter	4/15/19	GNE-2
I-Miguel	Miguel, Ron	Draft EIR Hearing Transcript	4/4/19	TR-3, GNE-1
I-Natvig	Natvig, Carl	Letter	4/15/19	AL-3, AL-4, AQ-2, GNE-1, ME-2, ME-8, TR-3, TR-4
I-Nawbary	Nawbary, Susan	Letter	3/15/19	TR-4
I-Nick	Nick	Letter	4/9/19	ME-4
I-Oatman-Stanford	Oatman-Stanford, Hunter	Letter	4/5/19	ME-1

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Date	Responses to Comments Codes
I-Pearce	Pearce, Mike	Letter	3/12/19	ME-7, TR-9
I-Reinhard	Reinhard, Robert	Letter	4/10/19	ME-6
I-Robertson	Robertson, David	Letter	3/12/19	ME-1
I-Schlansker	Schlansker, Steven	Letter	4/7/19	ME-1
I-Strassner	Strassner, Howard	Letter	4/5/19	AL-1, GNE-1, GNE-2, TR-3, TR-6
I-Thorsen	Thorsen, Holly	Letter	3/13/09	ME-1
I-Vedock	Vedock, Tod	Letter	3/14/19	ME-7
I-Walsh	Walsh, Thomas B.	Letter	3/13/19	ME-6
I-Weiner	Weiner, Rockwell	Letter	3/13/19	ME-1
I-Wright	Wright, David S.	Letter	4/1/19	ME-2, ME-6, TR-5
I-Yates	Yates, Gene	Letter	3/14/19	GNE-1

4. COMMENTS AND RESPONSES

This chapter of the Responses-to-Comments (RTC) document summarizes the substantive environmental comments received on the Draft Environmental Impact Report (Draft EIR) and presents responses to those comments. This chapter begins with a description of the overall organization of the RTC, followed by the comments and responses.

A. ORGANIZATION OF RESPONSES TO COMMENTS

The comments in this chapter are organized by environmental topic area and presented in the same order as in the Draft EIR. General comments not related to substantive environmental issues, including comments pertaining to the proposed project's merits, are addressed in the concluding sections of this chapter (the General Environmental Comments section, General Non-Environmental Comments section, or the Merits of the Project section). Prefixes related to the abbreviated environmental topic areas are used to group responses, as shown below.

B. Project Description (PD)

Comment PD-1: Project Description Correction

C. Transportation (TR)

Comment TR-1: Transportation Setting
Comment TR-2: Construction Impacts
Comment TR-3: Transit Impacts
Comment TR-4: Walking/Accessibility and Bicycle Impacts
Comment TR-5: Loading Impacts
Comment TR-6: Parking Impacts
Comment TR-7: Emergency Access Impacts
Comment TR-8: Western Variant
Comment TR-9: Enforcement of Private Vehicle and Transportation Network Company Restrictions

D. Cultural Resources (CR)

Comment CR-1: Historic Resources CEQA Findings

E. Air Quality (AQ)

Comment AQ-1: Policy and Plan Consistency
Comment AQ-2: Air Quality Emissions

F. Alternatives (AL)

Comment AL-1: Alternatives Considered in the Draft EIR
Comment AL-2: New Alternative (Combination of A, B, C)

Comment AL-3: New Alternative (Market Street Transit Thoroughfare Project)

Comment AL-4: Combined Bike-Transit Lane

Comment AL-5: Mission Street Alternative

Comment AL-6: No Project Alternative

G. General Environmental Comments (GE)

Comment GE-1: Public Meetings and Outreach

Comment GE-2: Construction Impacts and Mitigation Measures

Comment GE-3: Environmental Impacts Addressed in Initial Study

Comment GE-4: Cumulative Projects

H. General Non-Environmental Comments (GNE)

Comment GNE-1: General Comment

Comment GNE-2: Scope of Project

I. Merits of the Project (ME)

Comment ME-1: Support for the Proposed Project

Comment ME-2: Opposition to the Proposed Project

Comment ME-3: Economic/Business Impacts

Comment ME-4: Support for the Western Variant

Comment ME-5: Opposition to the Western Variant

Comment ME-6: Opposition to Private Vehicle Restrictions

Comment ME-7: Transportation Network Companies and Taxi Access

Comment ME-8: Transit Stop Spacing

Comment ME-9: Retention of Materials

Each comment is presented verbatim and concludes with the commenter's name and, if applicable, title and affiliation, the comment source (i.e., public hearing transcript or letter), the comment date, and the comment code. For the full text of each comment in the context of the public hearing transcript or each comment letter, the reader is referred to RTC Attachments A and B.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comments and clarify or augment information in the Draft EIR, as appropriate. The responses provide clarification of the Draft EIR text, and in some cases also include revisions or additions to the Draft EIR. Revisions to the Draft EIR are shown as indented text, with new text double-underlined and deleted material shown with ~~strikethrough~~. Corrections and/or clarifications to the Draft EIR presented in the responses are repeated in RTC Chapter 5, *Draft EIR Revisions*.

Many comments focus on the relative merits of the proposed project (that is, question the validity of the proposed project) or express support or opposition for the proposed project (or

elements of the proposed project) and do not comment on the adequacy or accuracy of the data, analyses, and conclusions of the Draft EIR. As required by the California Environmental Quality Act (CEQA), this Draft EIR evaluates the impact of the proposed action and does not—and need not—substantiate the reason for the action. Although the information contained in this RTC document will be transmitted to, and may be considered by, the decision-makers as part of their decision to approve, modify, or disapprove the proposed project, comments unrelated to the environmental analysis will be considered independent of the decision to certify the EIR. Responses provided for comments that are unrelated to the environmental analysis are provided for informational purposes only.

B. PROJECT DESCRIPTION

The comment and corresponding response in this section pertains to Chapter 2, *Project Description*, of the Draft EIR. The comments are grouped according to the following issue:

- PD-1: Project Description Correction

COMMENT PD-1: PROJECT DESCRIPTION CORRECTION

- I-Avallone-3

"2. Bike Safety: Bikes merging from Page street to Eastbound Market. I see the proposed project does not accommodate the considerable number of cyclists feeding market from Page in the morning rush. This intersection is not really safe now and in the proposed plans I don't see it making it better or safer. This important intersection connection should be revisited to accommodate this EB feeder path. See diagram attached." (*Vince Avallone, Individual, Email, March 24, 2019 [I-Avallone-3])*

RESPONSE PD-1

This comment expresses concern about safety for bicyclists merging from Page Street to eastbound Market Street under existing conditions, then suggests that the proposed project would not improve safety for bicyclists at the intersection of Page Street and Market Street. The commenter identified an error in Figure 2-3, Proposed Project Transportation and Streetscape Improvements (Sheet 10 of 10), on Draft EIR p. 2-41. As described below, this error has been corrected. This revision does not change the analysis or conclusions provided in the Draft EIR.

To correct this error, the sharrow designation on the portion of Page Street between Market Street and Franklin Street in Figure 2-3, Proposed Project Transportation and Streetscape Improvements (Sheet 10 of 10), on Draft EIR p. 2-41 was reversed to correctly indicate the

direction of bicycle travel. The street-level bicycle lane in this segment provides the connection from Page Street to Market Street noted in the comment. The corrected Figure 2-3 is included in RTC Chapter 5, *Draft EIR Revisions*. This revision is a typographical correction and therefore does not change the analysis or conclusions provided in the Draft EIR.

C. TRANSPORTATION

The comments and corresponding responses in this section cover topics in Section 4.B, *Transportation and Circulation*, of the Draft EIR. The comments are grouped according to the following issues:

- TR-1: Transportation Setting
- TR-2: Construction Impacts
- TR-3: Transit Impacts
- TR-4: Walking/Accessibility and Bicycle Impacts
- TR-5: Loading Impacts
- TR-6: Parking Impacts
- TR-7: Emergency Access Impacts
- TR-8: Western Variant
- TR-9: Enforcement of Private Vehicle and Transportation Network Company Restrictions

COMMENT TR-1: TRANSPORTATION SETTING

- I-Cauthen-2
- I-Hestor-1
- I-Hestor-4
- O-SFBC1-2
- O-SFTR1-3
- O-SFTR2-2
- O-SFTR2-4
- O-WSF1-1
- O-WSF2-2

"Ubers, Lyfts and a handful of bicycle riders unduly entangle parts of San Francisco, in the process making it far less safe for both bicyclists and peds." (*G. Cauthen, Individual, Email, March 21, 2019 [I-Cauthen-2])*

"Circulation and Transportation in this area of Market Street, in San Francisco, in the Bay Area has changed rather dramatically in the 5 years this EIR has been in preparation.

The way pedestrians walk with their eyes fixed on a cell phone in front of their face, often oblivious to other pedestrians and to vehicles as they cross the street. This has been a rather dramatic change as pedestrians operate in isolation from others - they are dealing with people on their phone or scrolling thru information on their phone. Or there are "buds" in their ears so they hear people or music - instead of hearing other pedestrians or bicycles or other vehicles." (*Sue C. Hestor, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hestor-1])*

"New non - vehicle transportation modes have exploded in the past 5 years. Motorized skateboards which go much faster, often on sidewalks. Scooters - electrified so go fast. Often on sidewalks, often on streets (going the wrong way). Share bikes, again often propelled by electricity. Again the new uses may feel that THEY always have the right of way - against pedestrians, wheelchairs, vehicles propelled by muscle power.

My office has been at Market/Powell between 4th & 5th Streets since the early 1980s. Since the Central Subway construction ripped up the Market, Stockton, Ellis, 4th intersection, getting thru that intersection one can see totally distracted pedestrians, wandering into the intersection against the light, or walking in a manner that ignores others on the sidewalk.

From my own experience, because of their configuration with streets coming in and crossing Market at an angle, the following intersections are challenging to many pedestrians: Van Ness/Oak, 9th/Hayes/Larkin, 7th/Brenham/McAllister, 6th/Taylor/Golden Gate, 5th/Cyril Magnin, 4th/ Stockton/Ellis, 3rd/Geary." (*Sue C. Hestor, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hestor-4])*

"Hundreds of thousands of people ride busses, trains, and bikes on or below Market Street daily. It really is the backbone of San Francisco's transportation system. Market Street is also one of our most dangerous streets, especially for people walking and biking." (*Charles Deffarges, San Francisco Bicycle Coalition, Draft EIR Hearing Transcript, April 4, 2019 [O-SFBC1-2])*

"and that the recommended alternative is inaccurately portrayed by comparisons to a dysfunctional and inappropriate "existing" base case.

The most appropriate "base case" for environmental comparisons would be an optimized and updated version of the 1985 passive priority (transit green wave) system, with stops at every block currently served. *(Rachel Hyden, Executive Director, and Peter Straus, Member, Board of Directors, San Francisco Transit Riders, Letter, March 29, 2019 [O-SFTR1-3])*

"Half a million people walk on the project segment of Market Street every day. This includes people walking to and from transit, people riding their bikes to Market Street destinations, people who've driven to the area, and people who've taken a taxi or ride hail to the many wonderful stores and venues on Market Street. Not surprisingly, Market Street has the highest concentration of people walking of any street in the city. It is a grand boulevard where people gather for marches and parades. Unfortunately, on this section of Market, crashes are 30 times more likely than on other similar streets in California. (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-2])*

"Second, the DEIR uses the current dysfunctional system as the base for comparisons. As an organization, we recommend using the version of the transit green wave preemptive single car passive priority system as the base case. This was up and running in the 1980s, and it worked very well." (*Rachel Hyden, Draft EIR Hearing Transcript*, *April 4*, *2019 [O-SFTR2-2])*

"Good afternoon, President Melgar and Commissioners. My name is Cathy Deluca. I'm policy and program director at Walk San Francisco, and my organization will be submitting a much longer letter in response to the draft EIR, but I wanted to come and shares some of the highlights with you.

So, as you all know, half a million people walk on this segment of market every day, and those just aren't what we think of as pedestrians. Those are transit riders, those are people who drive to Market Street, those are people who bike on Market Street. And so everyone walks on Market Street no matter how they get there, so making this street safe for pedestrians is vital.

So the bad news about all these people walking on Market Street, though, is it's not safe to walk there. Market Street is 30 times more dangerous than other similar streets in California. So it's really vital you get the design for people walking right." (*Cathy Deluca*, *Policy and Program Director*, *Walk San Francisco*, *Draft EIR Hearing Transcript*, *April 4*, *2019 [O-WSF1-1])*

RESPONSE TR-1

The comments identify existing concerns related to bicycle and pedestrian travel along the Market Street corridor as well as various ways of travel conflicting with vehicles, including Uber and Lyft. Another comment states that conditions from the 1980s, when the "transit green-

wave preemptive single-car passive priority system" was in effect, should have been used as the baseline for impact analysis.

This response presents information contained in the Draft EIR regarding the existing setting and documents why the 2020 baseline is the appropriate analysis year for the transportation impact analysis. The information in the transportation setting is supported by substantial evidence, and no changes to the Draft EIR are required in response to these comments.

Comments regarding the use of Market Street by people walking and bicycling, concerns about the safety of people walking at intersections and crossing the street while distracted, concerns about the increase in inattentive pedestrian behavior, the commenter's assessment of challenging intersections, and concerns expressed about bicyclists not complying with traffic laws and endangering people walking are noted. The environmental setting for bicyclists and pedestrians is presented on Draft EIR Section 4.B, *Transportation and Circulation*, pp. 4.B-15 to 4.B-22. This section includes information on the number of people bicycling and walking, including to and from transit, at key locations along the Market Street project corridor. This section also includes figures and a discussion related to the location and number of collisions involving bicyclists and pedestrians for the five-year period between January 2012 and December 2016. The collisions include those resulting from conflicts among pedestrians, bicyclists, and vehicles, including transportation network company (TNC) vehicles such as Uber and Lyft. Many of the concerns noted above regarding the safety of people walking and bicycling along Market Street were expressed during the public outreach process for the Better Market Street Project, starting in December 2011 (see Draft EIR pp. 2-6 to 2-8). To address these concerns, near-term safety and accessibility improvements were implemented as part of the Safer Market Street Project for the segment of Market Street between Third and Eighth streets (and which is reflected in the transportation setting). The needs identified through the public outreach process (i.e., to improve mobility, enhance access and the public realm experience, reduce conflicts and friction between travel modes, among other needs) formed the basis for development of the proposed project. These comments do not raise any specific environmental issues or questions regarding the adequacy or accuracy of the Draft EIR's analysis. As a result, no changes to the Draft EIR are required in response to these comments.

One comment states that the baseline for determining transit impacts should be something other than the 2020 baseline used in the analysis; it should instead reflect transit operating assumptions in effect in the 1980s and provide references and information regarding the 1985 single-car passive priority traffic signal system and the historic green-wave concept. Another comment suggests that the baseline for the transit impact analysis should be an optimized and updated version of the 1985 passive priority system; however, a baseline relying on conditions from the 1980s would not meet CEQA requirements (as described below) and, therefore, is not appropriate for use in this EIR.

CEQA Guidelines section 15125, Environmental Setting, states that an "EIR must include a description of the physical environmental conditions in the vicinity of the project. Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published. A lead agency may use projected future conditions (beyond the date of project operations) as the sole baseline for analysis only if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections, based on substantial evidence in the record."

As discussed in RTC Chapter 1, *Introduction*, the planning department published a Notice of Preparation (NOP) for an EIR on January 14, 2015. The existing transportation setting presented on Draft EIR pp. 4.B-2 to 4.B-27 is generally from the period on or after the January 2015 date. As discussed on pp. 4.B-27 and 4.B-28, the Draft EIR used a projected near-term future-conditions year of 2020 as the baseline for analysis. As described therein, several projects were recently completed, under construction, or approved and funded at the time when the NOP for the proposed project was published; therefore, several projects are expected to be under construction or completed by the time the proposed project is under construction. Because of changing conditions, a baseline other than existing conditions at the time when the NOP was published was determined to be appropriate for the analyses. This is because an analysis based on existing conditions could be misleading to decision-makers and the public. The near-term future baseline was supported by reliable projections, based on substantial evidence and summarized on the aforementioned pages.

As described on Draft EIR p. 4.B-27, a baseline year of 2020 was used in the analysis because a number of projects were under construction at the time when the NOP for this EIR was published. Projects that are approved and funded and likely to be completed by the time the proposed project is under construction. The 2020 baseline incorporates two transportation infrastructure projects that directly affect the Market Street project corridor: the SFMTA Safer Market Street Project and a project involving signal timing changes on Market and Mission streets. Use of a baseline that reflects conditions on Market Street 35 years ago, as suggested in some comments, would be misleading to decision-makers and the public. As a result, no changes to the Draft EIR are required in response to these comments.

COMMENT TR-2: CONSTRUCTION IMPACTS

- A-CT-2
- A-GGBHTD-3
- A-GGBHTD-5
- I-Magocsy-1

"*Traffic Safety*

Construction of the proposed project could result in substantial interference with vehicle circulation and accessibility where project intersects US 101/0ctavia Blvd and US 101/S Van Ness Avenue. Prior to construction, please make sure lane closures and signal timing adjustments are reviewed and approved by the Office of Highway Operations" (*Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review, Caltrans District 4, PO Box 23660, Oakland, CA 94623, April 15, 2019 [A-CT-2])*

"Mitigation Measure M-TR-1: The District is supportive of enhancements to Mission Street transit-only lanes during project construction, including possible longer operating hours and extended bus zones. However, the District requests that the width of the transit-only lanes be maintained with a width of at least 11 feet. Portions of the existing transit-only lanes on Mission Street do not appear to be at least 11 feet wide, which compromises the ability of buses operated by the District, Muni, and SamTrans to operate without interference from private vehicular traffic." (*Ron Downing, Director of Planning, Golden Gate Bridge Highway & Transportation District, April 11, 2019 [A-GGBHTD-3])*

"Impact C-TR-1: The District appreciates that cumulative construction-related transportation impacts have been acknowledged by the City and County of San Francisco. The District's buses have suffered notable overall travel time impacts within San Francisco because most streets served have been affected by current and ongoing construction activities. This reduces the reliability of the District's transit services, deterring customer usage, while simultaneously increasing operating costs. The District requests that the City undertake a more thoughtful approach to construction staging so that overall corridor impacts can be reduced to levels that are more manageable." (*Ron Downing, Director of Planning, Golden Gate Bridge Highway & Transportation District, April 11, 2019 [A-GGBHTD-5])*

"I just read about the plans for Market St. I work with the emergency 911 ambulances for SF. They regularly complain it's difficult to get through the city traffic as it stands today. The

current construction on Van Ness has contributed to gridlock around the Van Ness corridor. I don't think it's a wise idea to start closing Market St while the Van Ness project is still underway since that will add to gridlock in both the Van Ness/Market corridors. https://www.sfgate.com/bayarea/article/better-market-street-sf-environment-plan-car-13685936.php#photo-7984607." (*Mary Magocsy, RN, San Francisco EMS Agency, Individual, Email, March 13, 2019 [I-Magocsy-1])*

RESPONSE TR-2

The comments raise concerns regarding significant transportation-related impacts during construction of the proposed project. These include concerns about impacts on U.S. 101/Octavia Boulevard and U.S. 101/Van Ness Avenue, Golden Gate Transit bus routes, and emergency vehicle access and impacts resulting from overlapping construction schedules, such as the ongoing Van Ness Improvement Project. One comment states that prior to construction of the project, the City needs to obtain approvals from Caltrans for travel lane closures and signal timing adjustments on Caltrans facilities (i.e., U.S. 101/Octavia Boulevard and U.S. 101/Van Ness Avenue), while another requests that Mitigation Measure M-TR-1, Construction Management Plan – Additional Measures, include widening of travel lanes on Mission Street to 11 feet to accommodate buses better.

This response provides information and clarification regarding the proposed project's construction-related transportation impacts, as presented in Impact TR-1 on Draft EIR pp. 4.B-45 through 4.B-52, which were determined to be significant and unavoidable with mitigation. This analysis is supported by substantial evidence, and no additional analysis or mitigation measures are required.

As stated on Draft EIR p. 4.B-29, construction of the proposed project would comply with the Caltrans *Construction Manual* where the proposed project would affect the state highway system (e.g., Van Ness Avenue) and applicable approvals would be obtained. The timing and the order of project construction would depend on funding. As stated on Draft EIR pp. 4.B-46 and 4.B-47, the project would be constructed at as many as seven location-specific segments along Market Street, with up to two segments constructed simultaneously. To minimize disruptions, construction would generally occur in stages, from the center travel lanes, for track replacement; to the curb travel lanes; to the sidewalks; and then to the intersections. Although construction of the proposed project would be conducted per the requirements in the City's *Regulations for Working in San Francisco Streets*, eighth edition (also known as the "Blue Book") (i.e., safely and with the least possible interference with pedestrians, bicycle, transit and vehicular traffic), it is possible that substantial disruptions for transit (including Muni, Golden Gate Transit, SamTrans, and PresidiGo bus routes), pedestrians, and bicyclists would occur during the construction period. Mitigation Measure M-TR-1, which identifies additional

measures that would be incorporated into the Construction Management Plan prepared for project construction, includes a measure to convert the peak-period transit-only lanes to all-day transit-only lanes on Mission Street in order to accommodate detours of buses from Market Street to Mission Street. This measure would include restriping Mission Street's travel lanes between First and 11th streets. This would provide wider travel lanes that would be able to accommodate buses, as suggested in a comment. It is acknowledged that the Golden Gate Bridge Highway & Transportation District would prefer 11-foot-wide transit-only lanes on Mission Street as part of Mitigation Measure M-TR-1. SFMTA would provide a minimum 11-foot-wide transit-only lane to the maximum extent possible, except for limited locations where the constrained right-of-way precludes this width. SFMTA would restripe the travel lanes on Mission Street to adequately accommodate transit operating on that street, including Muni, Golden Gate Transit, SamTrans, and PresidiGo bus routes.

With respect to concerns about maintaining emergency vehicle access during project construction, Mitigation Measure M-TR-1 also requires the construction contractor to prepare a segment-specific emergency access response plan as part of compliance with bid specifications (Draft EIR p. 4.B-51). This response plan would include fire department and emergency service access to construction areas and the maintainability of emergency services such as fire hydrants throughout project construction.

Cumulative construction-related transportation impacts, presented in Impact C-TR-1 on Draft EIR pp. 4.B-94 and 4.B-95, were determined to be significant and unavoidable with mitigation. Construction of the Van Ness Improvement Project is anticipated to be completed in 2021, and therefore, it may overlap with proposed project construction, which is anticipated to start in 2020. However, because construction of the Better Market Street Project would occur in segments and be phased over at least a 6-year period, starting with the segment of Market Street between Fifth and Eighth streets, project construction near Van Ness Avenue would be scheduled following completion of the Van Ness Improvement Project in 2021. As noted on Draft EIR p. 4.B-51, Mitigation Measure M-TR-1 addresses the potential for project overlap with other development and infrastructure projects and includes a measure that would require preparation of a coordinated construction management plan should construction overlap occur.

COMMENT TR-3: TRANSIT IMPACTS

- A-GGBHTD-2
- A-GGBHTD-4
- I-Miguel-1
- I-Natvig-2
- I-Natvig-6

- I-Natvig-8
- I-Natvig-10
- I-Natvig-13
- I-Strassner-3
- I-Strassner-7
- O-SFTR1-2
- O-SFTR1-4
- O-SFTR2-1
- O-SFTR2-3

Four of these bus routes also operate on Mission Street, which is parallel to Market Street and would be impacted by the diversion of private vehicles from Market Street." (*Ron Downing, Director of Planning, Golden Gate Bridge Highway & Transportation District, April 11, 2019 [A-GGBHTD-2])*

"Impact TR-4: The District understands that less-than-significant impacts are identified for its transit services because the significance threshold is a travel time change equal to half the baseline headway. It should be noted that the Financial District and Salesforce Transit Center route alignments have significantly more outbound service than indicated on Table 4.B-4. For the Financial District alignment, the outbound baseline should be approximately 0:90. For the Salesforce Transit Center alignment, the outbound baseline should be 12:00. Using the corrected thresholds, the indicated travel time changes continue not to meet the significance threshold." (*Ron Downing, Director of Planning, Golden Gate Bridge Highway & Transportation District, April 11, 2019 [A-GGBHTD-4])*

"Commissioners, I'm Ron Miguel. I chair the Better Market Street Citizens Working Group, and I'm deeply involved in this much needed project. These are my personal remarks and do not represent the Working Group. In general, I find the DEIR to be complete and accurate; however, there's one area in particular where I do have a problem. It concerns the boarding islands. This is not only of concern for the elderly and disabled communities but also for the general public.

The recommended plan reduces the number of boarding islands to six inbound and four outbound. The distances between islands ranged from a very long 1,082 feet to a completely unacceptable 2,867 feet. This is over half a mile. Distances between six of the ten stops exceeds

2,000 feet. This creates an excessive and extremely adverse impact on all transit passengers and is not, in my mind, adequately discussed in the DEIR.

If the enhanced island stop spacing is adopted, it will mitigate the adverse impacts of the stop spacing in the recommended plan. The enhanced concept preserves reasonable stop spacing while still reducing the number of stops from what currently exists.

In addition, there's the failure to include island stops at 4th Street, the intersection of the new Central Subway which is due to open later this year. This is totally contrary to do good transit practice and makes an already long access path to and from the Central Subway's platform even longer. A stop for all Market Street transit lines at 4th Street is an absolute necessity." (*Ron Miguel, Individual, Draft EIR Hearing Transcript, April 4, 2019 [I-Miguel-1])*

It is my opinion, based on my experience with the planning and implementation of the Market Street operating system including the overhead wire system, that the Better Market Street proposal would substantially degrade transit speed, reliability, and safety." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-2])*

"'BETTER' MARKET FATAL FLAWS:

- - - Since the same number of passengers need to load in total, regardless of the number of stops, removing a stop saves only 15 seconds for 40 - foot buses and 20 seconds for 60 - foot buses. Deceleration and acceleration add 10 seconds for a 40 - foot bus, 15 seconds for a 60 - foot articulated bus, while the first passenger loading adds about 5 seconds more. Otherwise, each passenger takes about 1.7 seconds. The remaining total loading time is then 1.7 seconds times the number of passengers loading regardless of the number of stops.

Since signals cannot be synchronized for both non - stopping buses and stopping buses on the same block, having both local service and rapid, i.e. limited stop, service must result in more red lights for either the local or the limited or both. Since red lights last from zero to 30 seconds, the added red lights resulting from sub - optimal stop spacing and consequent sub - optimal signal synchronization from having both local and limited stops, would roughly cancel the 15 to 20 second time savings per stop from eliminating the local stops to implement the "rapid", limited - stop service." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-6]*

"- - - Pre-empts cannot work with frequent service. Transit vehicles end-up pre-empting each other. Actually, pre-emption for transit cannot work well even on light lines since full pre-emption would result in disruption of the auto-oriented signal progressions of the signals from intersection to intersection defeating the purpose of the pre-empts which is to preserve signal timing progressions for autos. For these reasons, pre-emption is limited by the SFMTA to

extending the green phases about one-sixth of a cycle, i.e. 10 to 15 seconds. In other words, the pre-empts are limited to being activated only one sixth of the time or one third of the red-light time resulting in eliminating only less than one half of red delay (one third of the red phase plus reducing the probability of encountering the delayed red light).

Since most transit routes are on major arteries, the green phases for cross-streets are set at the minimum for pedestrians which means that a red light on the transit street following a pre-emption cannot be shortened in order to restore the signal progression. Instead, the following green phase on the transit street is shortened. This also usually means that the shortening of the following green phases for the transit street must be spread over several signal cycles. Also, the red phase on the transit street cannot be shortened without cutting off the pedestrian count-down for the cross street. Theoretically, one might postulate that the end of a red phase might be advanced by shortening the preceding green phase on the transit street. However, this would require detecting the arrival time of an approaching transit vehicle a couple of cycles in advance, i.e. one or two stops for the transit vehicle in advance with pin point accuracy, without interfering with other transit vehicles moving in either direction along the street, a highly problematical proposition. The traffic engineers have been trying to make signal pre-emption work in San Francisco for over 20 years with little success, but with an investment of about $20 million for fiber optic cables interconnecting the traffic signal system for central office control. The primary purpose of the central computer control system was actually to minimize delay to auto drivers.

In 1985, it took about 3 days to work out the bugs in the Market Street transit-optimized system which used only signal synchronization and eliminated over 90% of red-light delay to transit from Main to Van Ness.

- - - Since the Better Market proposal introduces uneven island and curb stop spacing, it would not be possible to synchronize signals for red-light delay-free operation in both directions at the same time for even the limiteds. It would only be possible to synchronize signals for one of the four lanes at a time instead of all 4 lanes as with the Transit Thoroughfare system." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-8])*

" - - - The plan calls for moving the center lines of the two tracks from 10.5 feet to 11.0 feet by ripping out the track which should otherwise be good for another 70 years and installing new track at great expense. The 11 - foot spacing requirement was apparently introduced in the 1970's by the California PUC at a time when the only street railway in operation in California was the Muni which used 10.5 foot spacing, a mystery. Because of the narrowness of the traffic lanes adjacent to the BART entrances, doing this would make it impossible to continue to have islands at New Montgomery inbound, 4th inbound and outbound, 5th inbound, 7th inbound,

and 8th outbound. Relocating any of the islands would essentially make it impossible to ever synchronize the signals for delay‐free operation ever again.

‐ ‐ ‐ Many of the curb stops are proposed to be located far‐side of the numbered intersections. Combining this unsynchronizable signals system with farside stops means that many buses will have to stop twice at these intersections, once for the red traffic light and then across the street at the farside curb‐stop. The 1985 Transit Thoroughfare Project eliminated close to 100% of non‐productive, i.e. non‐loading, stops at red lights from 1985 to 1989 between Main and Van Ness and from 2003 to 2007 between Main and 9th. Even though the curb stops were located a few hundred feet behind the stop lines at the islands, since the signals were synchronized fairly precisely for transit, the drivers could easily avoid having to stop for the lights at the numbered streets." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-10])*

" ‐ ‐ ‐ Traffic Engineering is currently moving cycle lengths longer to 75 seconds or longer. As discussed above, a cycle length of 60 seconds on Market is optimal for transit.

A walking speed of 3 feet per second, recommended by the California Manual on Uniform Traffic Control Devices, referenced in the Traffic Signal Operations Manual, February 2017, would allow one to cross a 90‐foot street curb to curb in 30 seconds. The MUTCD also recommends a minimum of 4 seconds of walk plus 3.5 feet per second walking speed for the flashing red hand plus 3 seconds of red hand which corresponds to 91 feet for 30 seconds of green and yellow, 3.5 ft./sec. times 26 seconds. If your bulb‐out the curbs at the crosswalks, then it would be more like 106 feet. A 60 second cycle length would allow for 30seconds of green and yellow, or 30 seconds of walk and flashing don't walk with a countdown, in each direction.

The purpose of employing longer cycle lengths has been and still appears to be to increase automobile capacity by giving a greater percentage of the green time to the main direction of travel and the minimum possible time to the lesser cross streets such as along Van Ness, Geary, 19th Avenue, etc. With a 90 second cycle length, one can give 30 seconds of green and yellow to the cross streets and 60 seconds to the main street instead of 30‐30, 50%‐50%.

Since Market Street is 50 feet wide west of Steuart to 8th, 66 feet to 12th, and, as I recall it, 88feet to about Laguna, an 90 feet to Castro, a 60 second cycle with a 30‐30 split should be safe enough, especially with bulbs or islands in line with parking with protected bike lanes at the crosswalks west of 12th. However, since Van Ness is part of Highway 101 and the number of lanes has been reduced for the BRT, reducing the cycle back to 60 seconds, as it was until the early 1990's, is unlikely. Regardless, timings more favorable to transit rather than the auto west of 8th on a 75 or 90 second cycle appear to be feasible.

The only exception on Market east of 9th appears to be the crosswalk on the north side of Market parallel to Market at Drumm. The distance is about 93 feet. The 3 feet per second

standard could be accommodated by using 31 seconds for market and 29 seconds for Main. My records show that it was 22 seconds for Market in 1985. It should be noted that the conflicting auto movements from southbound Drumm or northbound Main take about 2 seconds to reach the Market north crosswalk which suggests that the walk plus flashing don't walk phase could be set at 29 seconds.

The problem at present is due to the need to provide more time for Main for the large number of buses exiting the temporary Transbay Bus Terminal and turning left off Main onto Market. Since these buses will hopefully be rerouted onto Fremont in the near future, it should be possible to solve this problem then by providing 31 seconds of green and yellow for Market and 29 seconds for crossing Market. Since Market is 50 feet wide, theoretically the crossing time for pedestrians could be reduced all the way down to 18 seconds.

The basic technique for synchronizing signals for red‐light, delay‐free transit operation in both directions at the same time is to set the cycle length equal to the travel time from stop to stop, have the lights turn green at the same time at the transit stops, have the stops at the stopping intersections either both nearside or both farside, but preferably nearside, having the stops equally spaced, and having the lights at the intersections in‐between the stops turn green a few seconds later equal to the travel time at a constant 25 mph to the nearest intersection with a bus stop. Any deviation from setting the cycle length equal to the average travel time from stop to stop will cause red light delays in one direction or the other or both directions. A green wave on Market for transit with a cycle length longer than 60 seconds could only be done for one direction at a time and would result in long waits at stops for transit in the reverse peak direction. The delay would total about an additional 4 minutes from 8th to Spear in the reverse direction using a 75 seconds cycle for example. Such a peak direction green wave would also cause red lights for bicyclists at the transit stops in the reverse peak direction instead of none in both directions at 10 mph.

Since only about 25% of trips made to the downtown are made by auto in contrast to about 90% of trips in the Bay Area, and since the downtown streets are very congested, it makes no sense to try to increase capacity for autos and encourage driving while slowing transit, and consequently reducing patrons and revenue while increasing operating costs for transit. Increasing autos in the downtown also increases the rapidity with which back‐ups spread throughout the downtown whenever there is an accident or a blockage. Moreover, decreasing transit use and increasing auto traffic increases risk to bikers and pedestrians. Longer red lights tend to increase delays for pedestrians and consequently encourage dangerous jay‐walking.

Since a 60 second cycle allows for bi‐directional timing with minimum red‐light delay in both directions, the cycle lengths should be restored to 60 seconds east of Van Ness throughout including Soma since the streets in Soma are 52 to 62 feet wide. The signal at 9th should be synchronized with the signals at 10th and at Van Ness to prevent unnecessary stops at 10th outbound since transit vehicles must stop outbound at 9th and inbound at 8th anyway.

- - - Pedestrian leading walk signal. Traffic Engineering has been experimenting with giving pedestrians an advance walk signal preceding the green signal. This subtracts green time from the green phases. With transit optimal signal timing on Market, the green phase must be at least 27 seconds in order to clear ‑ out autos at the islands ahead of the approaching transit vehicles. Since most of the streets crossing Market also have transit, shortening the green phases for the cross streets would likely be a problem, as well. However, since the crosswalks at the Market Street intersections are very wide, the pedestrians already get a head ‑ start. An even greater head ‑ start can be provided by moving the stop line in the curb lane further upstream. Regardless, when the transit optimal signal system was in operation, most, if not all, autos arrived at the numbered intersections at the end of the green phases when the pedestrians had already gotten a head ‑ start. Installing advanced pedestrian walk phases along Market is, therefore, clearly redundant and unnecessary." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-13])*

"B) 4.B-63 in Volume 2: Shows the headway between transit vehicles, on each route, for both the dedicated center and curb running lanes. This section should be amended to show the combined average headways for all of the routes running in each section, of the center and curb running lanes. This is necessary because bunching on Market Street is due to buses on different routes traveling in the same lane as well as buses on the same route. This same information should also be shown for 2040 because of our increasing population and increasing transit use, to meet our Climate Change Commitments, will require more transit service. This is also necessary because the SFMTA may have to include some small capital projects within the current project boundaries to facilitate turn backs to keep the average headway to near three minutes, on each section, to prevent future bunching." (*Howard Strassner*, *Individual*, *Letter*, *April 5*, *2019 [I-Strassner-3])*

"G) The Project should provide bus boarding bulbs to eliminate any possibility of transit reentry delays due to general traffic.

H) The Project should include a discussion of provisions for buses to safely pass the bus, just in front of them, in their lane, to deal with disabled buses and buses that require too much time to load and leave. This could be essential to minimize bunching." (*Howard Strassner*, *Individual*, *Letter*, *April 5*, *2019 [I-Strassner-7])*

"**Transit impacts:**

The DEIR evaluates transit impacts solely on the basis of the following single criterion:

Impact TR-4. The proposed 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. (Less than Significant)

Using such a statement as the sole criterion of transit impacts is agency-focused and disrespectful of riders' needs.

There are significant impacts on Market Street transit riders resulting from proposed changes in stop locations and related traffic signal changes not captured by such a metric. We find such impacts of the staff recommended project significant and adverse, inadequately presented in the environmental documentation, and requiring analysis and mitigation.

1. TRANSIT STOP SPACING

Current center lane transit vehicles stop at eleven inbound and ten outbound boarding islands between Drumm Street and Van Ness Avenue, located at the nearside of almost every block. The distance between stops ranges from 600 to 1450 feet between stops, generally conforming to SFMTA standards.

As shown in Table 1, the recommended plan for Market Street reduces the number of recommended boarding islands to six inbound and four outbound, with the distances between islands ranging from 1082 to an unacceptable 2867 feet, over half a mile. Six of the ten gaps between stops exceed 2000 feet, as indicated in yellow on our table.

This constitutes an excessive and adverse impact on transit riders, and one that is not adequately discussed in the DEIR.

In 2013, when this proposed stop spacing was first suggested ("Rapid" stop spacing), it was proposed in conjunction with an awkward set of line assignments that separated paired Rapid from Local lines. (See Figure 1, from DEIR Appendix 11.) We concurred with staff when this set of line assignments was abandoned in favor of the more legible and convenient assignments associated with the so-called "Enhanced" stop spacings. However, staff did not then revert to those "Enhanced" stop spacings (Concept 1) that had been associated with the paired line assignments.

Were the Enhanced island stop spacings to be adopted, that would mitigate the adverse impacts of the stop spacings of the recommended plan that we are here calling out.

In simple terms, the "Enhanced Concept" would preserve reasonable stop spacing, thus mitigating this particular impact, while still reducing the number of stops from what currently exists.

That said, any dilution of stop frequency from the current spacing at essentially every block imposes impacts on riders that warrant evaluation in the DEIR.

O-SFTR-TR-5 cont

Table 1: Existing and Proposed Transit Stop Locations and Spacing.

Existing											
Inbound						Outbound					
Curb			Center			Center			Curb		
Streets	Position	Distance	Streets	Position	Distance	Streets	Position	Distance	Streets	Position	Distance
8th/7th	mid	-	Gough	near	-	*Drumm **	*near*	-	*Drumm **	*near*	--
7th/6th	mid	675	Van Ness	near	1025	Battery	near	1450	Front	near	1100
6th/5th	mid	925	9th	near	1250	Sans./Mtgy.	mid	925	Sans./Mtgy.	mid	1275
5th/4th	mid	650	8th	near	625	Kearny	near	800	Montgomery	far	450
4th/3rd	mid	800	7th	near	925	Stockton	near	1025	Grant	far	1100
3rd	far	825	6th	near	850	Cyril Magnin	near	875	Powell	near	875
2nd/1st	mid	1225	5th	near	975	Taylor	near	925	Mason/Taylor	mid	950
Beale	far	1100	4th	near	800	7th St N	near	900	7th N	near	1075
AVG		*890*	3rd	near	1050	Hyde	near	925	7th N/Hyde	mid	875
MAX		*1225*	New Mtgy	near	625	Larkin	near	600	*AVG*		*960*
#		8	1st	near	1150	Van Ness	near	1175	*MAX*		*1275*
			Main	near	1100	Gough	near	1125	#		9
			AVG		*940*	AVG		*980*			
			MAX		*1250*	*MAX*		*1450*			
			#		12	#		11/12**			

Proposed											
Inbound						Outbound					
Curb			Center			Center			Curb		
Streets	Position	Distance	Streets	Position	Distance	Streets	Position	Distance	Streets	Position	Distance
Gough***	near	-	Gough	near	-	*Drumm **	*near*	-	*Drumm **	near	--
Van Ness***	near	841	Van Ness	near	1133	2nd	near	2117	Front	near	832
9th	far	1514	8th/7th	mid	2259	5th N	near	2702	Sans/Mtgy.	mid	688
8th/7th	mid	1024	5th	far	2867	7th N/Hyde	mid	2397	Mtgy./Kearny	mid	1133
6th	near	936	3rd	near	1286	Van Ness	near	2073	Grant	far	1046
5th	near	912	1st	far	1741	Gough	near	1101	5th N	near	1411
4th/3rd	mid	1475	Main	near	1082	*AVG*		2080	Taylor	far	976
3rd/NMtgy.	mid	960	*AVG*		1730	*MAX*		2702	7th N/Hyde	mid	1108
1st	near	1036	*MAX*		2867	#		5/6**	Larkin	far	1208
Main***	near	1360	#		7				Van Ness***	near	861
AVG		*1120*							Gough***	near	1101
MAX		*1514*							*AVG*		*1036*
#		10							*MAX*		*1411*
									#		11

* Curb stop also used by center-lane services, sidewalk widened to provide only one outbound lane
** Smaller figure for use in counting total stops; larger figure is number of stops made by center-lane services
*** Island stop with local service

Last updated 10-23-17

2. FOURTH STREET AND THE CENTRAL SUBWAY

The above discussion of the "Enhanced" stop locations notwithstanding, we are concerned that the proposal as recommended fails to include island stops at Fourth Street, the point of intersection with the new Central Subway, due to open late this year. This is contrary to good transit practice, and makes a long access path to and from the Central Subway's platform even longer. A stop for all transit lines at Fourth Street should be provided.

We note that Third and Kearny, where Market Street lines intersect the northbound 8, 8AX, 8BX, 30 and 45 lines, is one of, if not the, heaviest transfer point on the Muni system, even more so if adding in the southbound connections at Fourth Street, and a significant degree of this activity will shift from the surface buses to the underground T-Third line in the Central Subway facility.

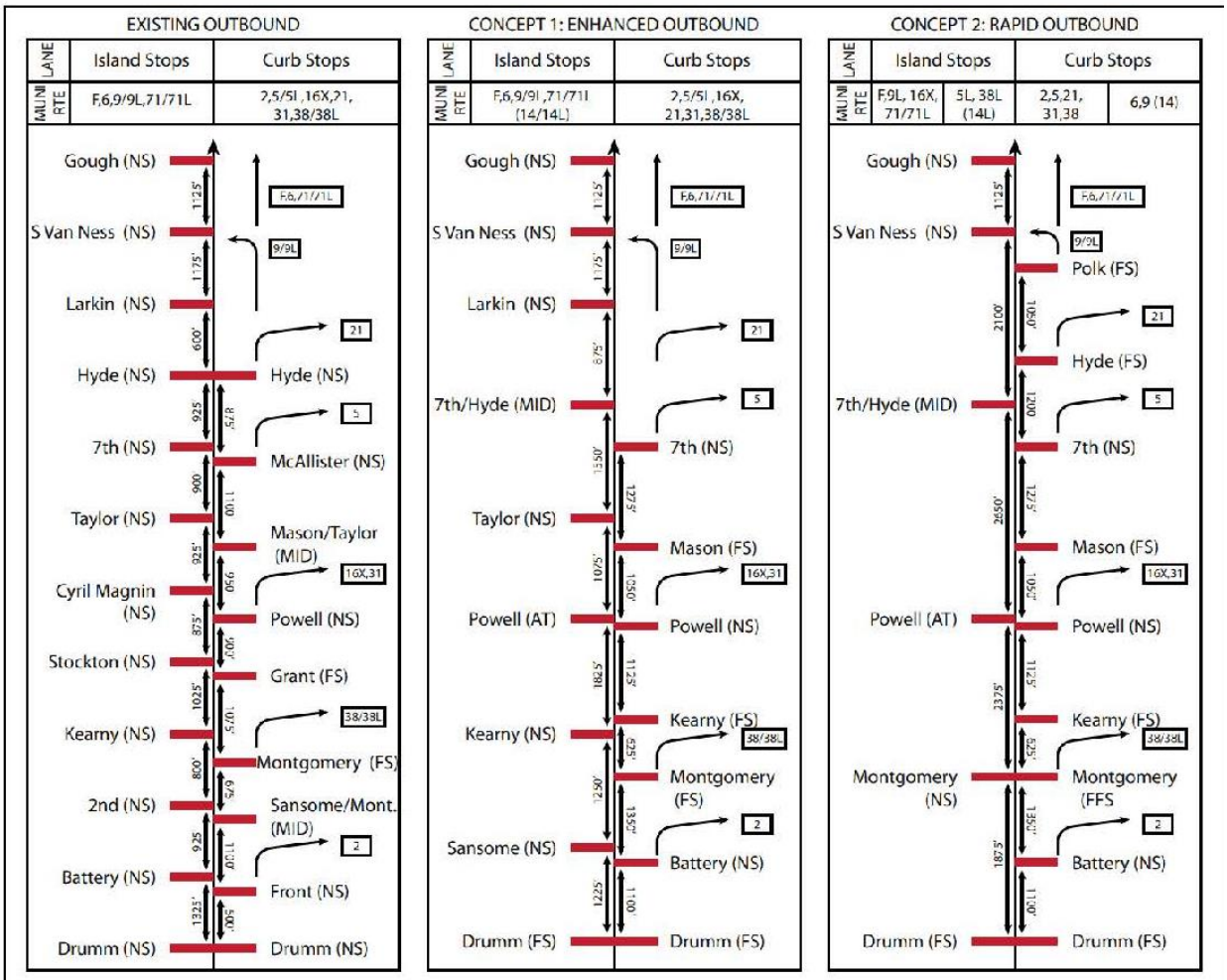
A close examination of the staff proposals show that Muni is squeezed at Fourth Street between BART entry structures and the proposed surface bikeways in a manner that appears to give lowest priority to providing an island Muni stop at this and possibly other locations. This raises questions as to the design of the BART entries themselves, which consume an inordinate amount of street width, more than street subway entries in other cities.

Figure 2 illustrates that even in the early twentieth century, New York realized that staggering entry facilities rather than providing all stairs and (today) escalators parallel to one another in a single wide structure consumes excessive street width.

The designs evaluated for this and possibly other locations along Market Street failed to consider redesign of BART entries as one solution to providing space to allow Muni island stops at the most desirable locations.

Whether by modifying BART entries or other means, the impacts of not providing Muni stops at the most desirable locations, such as Fourth Street, and possible mitigations, have not been addressed in the environmental documentation."

Figure 1: Transit stop comparison. (Source: DEIR App. 11—Better Market Street Final Report, 2013; pp 18-19.)



- Enhanced Local Transit operations: with minor stop optimization changes, Enhanced Local Transit operations would result in nine island stops and seven curb stops in the inbound direction and nine island stops and six curb stops in the outbound direction. Transit operations would continue to assign lines on a destination basis, i.e., inbound buses headed to the Ferry Building travel in the center lane and inbound buses en route to the Transbay Transit Center (TTC) travel in the curbside lane. Outbound buses headed to the Castro would stay in the center lane, while buses turning onto the North-of-Market grid would travel in the curbside lane. This lane assignment would allow passenger to board both limited and local bus service at the same stops, thereby preserving system legibility.
- Rapid Transit operations: with significant stop optimization changes, Rapid Transit operations would result in six island stops and nine curb stops in the inbound direction and six island stops and eight curb stops in the outbound direction. Limited-stop transit lines would be assigned the center lanes, while local lines would use the curbside lanes. The limited lines in the center lane should benefit greatly from the greater stop spacing (averaging about 2000 feet). However, route legibility for customers may be jeopardized for customers, as they would no longer be able to catch limited and local buses at the same stop. The Rapid Transit lane assignment scheme would also require inbound limited buses headed to the Transbay Transit Center to change lanes before turning right at 1st Street. Similarly, outbound limited buses headed to the NOMA grid would need to transition to the curbside lane before taking a right turn, which is a maneuver not currently needed with the existing lane assignments.

Figure 2: Staggered subway kiosks in early twentieth century New York.



3. TRANSIT TRAVEL TIMES

The goal of the San Francisco Transit Riders is to ensure that Market Street transit operations present passengers with the fastest and most reliable transit service that can be achieved in a safe and effective manner.

Rather than representing "surface subway" travel times, even the vehicle speeds presented by the recommended proposal remain close to 7 MPH or less, hardly a "rapid" experience. If the added walking times to the reduced stops are factored in, for many riders the equivalent speeds drop to 6.6 MPH or less for lines using the center islands. Curb bus riders fare even worse, with afternoon peak buses remaining at 5.4 MPH. These are almost all significantly slower than 1985-1990 "transit green wave" times. We would consider that an adverse project impact on transit riders.

It is our conclusion that the DEIR does not demonstrate that optimally improved travel times can be best accomplished by the recommended alternative," *(Rachel Hyden, Executive Director, and Peter Straus, Member, Board of Directors, San Francisco Transit Riders, Letter, March 29, 2019 [O-SFTR1-2])*

"Furthermore, the travel times offered by the recommended alternative at best are an insufficient improvement over even current times.

More specifically, the DEIR fails to establish that the recommended project provides transit travel times to the rider that are superior to those that would be afforded by an alternative incorporating the historic "transit green wave" concept, without the adverse impacts of the recommended project as discussed earlier in these comments.

Whether by optimizing an alternative in concert with a transit green wave—which the city has not done—or by additional traffic restrictions, or by other means, the city owes transit riders a preferred alternative that provides benefits in excess to the recommended treatment.

The remainder of this section will elaborate on these conclusions.

Page 17 of DEIR App. 11—Better Market Street Final Report, 2013, describes the Market Street transit operating plan as follows:

> The existing design of Market Street consists of a near‐side transit stop at every intersection with a numbered street, except for at 2nd Street (stop at New Montgomery Street). Curbside stops were placed midblock to prevent both travel lanes from being blocked by transit vehicles at the intersection. The legacy signal timing for the Market Street corridor was designed to have every transit vehicle board and alight at the intersection's stop (red) phase, with buses ready to depart at the next green signal phase. However, this signal timing scheme no longer works due to changes in the traffic modal distribution (e.g., the addition of the historic F‐Line streetcar and the dramatic increase in bicycle traffic), changes to the freeway network after the Loma Prieta earthquake, and the temporary traffic/transit rerouting due to Central Subway construction.
>
> The goal of the two transit concepts ["Enhanced" and "Rapid"] summarized [above] is to create a more resilient scheme for improved transit operations. The basic premise for improving transit operations is through stop location and distance optimization. Rather than providing a transit island and curb stop every block (about every 900 feet, on average), the proposals attempt to provide stops every one and one‐half blocks (about every 1,400 to 1,500 feet, on average) or farther. [Note: this is a description of the "Enhanced" concept– not the "Rapid" concept now recommended.] The Enhanced Local Transit concept would preserve the existing route‐based travel lane assignments, while the Rapid Transit concept would assign all limited service buses to the center lane and the local buses to the curb lane.
>
> Another goal for the transit stop design is to move the island stops from near‐side to far‐side or midblock locations to reduce instances where near‐side island stops prevent vehicles in the curbside lane from moving into the center lane to get around vehicle queues near the intersections. This is a common occurrence at high pedestrian traffic intersections where right‐turning vehicles frequently queue at the crosswalk.

We must take issue with some of the statements quoted above as to why the transit green wave design for Market Street "no longer works." First, most of the streetcars in use on the F-line are of the "PCC" design and have acceleration rates and speed characteristics not dissimilar from buses. There are issues related to longer dwell times primarily resulting from large numbers of visitors and slow fare collection, but these are issues that SFMTA must address directly. As to both the Loma Prieta freeway issues (after the Central Freeway was closed and before Octavia Boulevard opened) and Central Subway issues, these are temporary not permanent effects. Other occurrences in the intervening years, such as the introduction of all-door boarding, should have facilitated the effectiveness of the transit green wave concept.

But SFMTA has never sought to optimize the transit green wave system in recent years, instead abandoning its precepts before the "existing" system was documented as a base case. And the interrelationship between the traffic signal system design and the physical design of Market Street is too important for the environmental analysis to discount the importance of both elements. The physical layout of stops cannot be accurately evaluated independently of the signal regimen in place for Market Street, and both constitute components of the proposed project.

Even viewed conservatively, there is no evidence that the transit green wave design is incapable of roughly matching the performance of the recommended "Rapid Transit" design—but do so with more transit stops and accordingly shorter walks to them.

Table 2 summarizes the available travel time data for Market Street alternatives.

Only four scenarios were evaluated using the VISSIM traffic simulation tool: the inbound and outbound PM peak scenarios for both curb and center island transit operations.

Of those four scenarios, there is no clear pattern indicating the recommended alternative performs better than observations when the transit green wave was functional (including island stops at every block) in the 1985-1990 period.

If net rider speeds are considered by introducing even a conservative walk-time penalty (4.5 fps), it becomes even clearer that the recommended alternative, even with fewer stops, does not outperform 1985-1990 conditions. For example, PM peak outbound speeds for center island lines were 6.3 MPH as measured in 1985 and 7.0 MPH on the 1990 video. Net speeds experienced by riders of the recommended project would range from 7.2 MPH to as little as 6.3 MPH—with less convenient stops. (Even this is a simplified comparison: mathematically, the shorter the Market Street trip, the lower a rider's net speed would actually be!) If a conservative walk speed were introduced (3.0 fps), these differences would be greater.

Table 2: Summary of Running Time Estimates and Data. (See also notes on next page.)

Lane		Direction	Scenario	Segment	Route	Time	Bus Speed	Net Speed
Center	AM Peak	IB	Sep 1985	7th-Fremont	8	7:30	8.8	
			Sep 1990	8th-Steuart		12:18	7.5	
		OB	Sep 1985	Front-7th	8	7:54	8.4	
			Sep 1990				--	
	Mid-Day	IB	Sep 1985	7th-Fremont	8	8:39	7.6	
			Sep 1990	8th-Steuart		9:57	5.9	
			Existing	11th-Beale	9	15:45	6.3	
			TTRP Project	11th-Beale	9	10:45	9.2	
		OB	Sep 1985	Front-7th	8	9:59	6.6	
			Sep 1990	Steuart-8th		13:24	6.9	
			Existing	Drumm-11th	9	17:15	6.0	
			TTRP Project	Drumm-11th	9	12:36	8.2	
	PM Peak	IB	Sep 1985	7th-Fremont	8	10:19	6.4	
			Sep 1990	8th-Steuart		10:38	8.7	Avg. 7.9
			Sep 1990	8th-Steuart		12:57	7.1	
			Existing	11th-Beale	9	19:39	5.0	
			Model No-Project	10th-Spear	9R	18:00	5.6	
			Model Project	10th-Spear	9R	14:00	7.2	to 6.6
			TTRP Project	11th-Beale	9	14:39	6.8	to 6.1
		OB	Sep 1985	Front-7th	8	10:24	6.3	
			Sep 1990	Steuart-8th		13:12	7.0	
			Existing	Drumm-11th	9	19:24	5.3	
			Model No-Project	Main-10th	9R	15:30	6.3	
			Model Project	Main-10th	9R	13:30	7.2	to 6.3
			TTRP Project	Drumm-11th	9	14:46	7.0	to 6.2
Curb	AM Peak	IB	Sep 1985	8th-1st	5	9:55	7.3	
			Sep 1990					
		OB	Sep 1985	Front-7th	5	9:33	6.9	
			Sep 1990	Steu/Mkt-Grant?		6:27		
	Mid-Day	IB	Sep 1985	8th-1st	5	11:27	6.3	
			Sep 1990	8th-1st/Mission		9:28	8.4	
			Existing	S Van Ness-1st	7	15:05	6.2	
			TTRP Project	S Van Ness-1st	7	12:51	7.2	
		OB	Sep 1985	Front-7th	5	11:24	5.8	
			Sep 1990	Mis/Fre-Gy/Mkt	38	5:30	5.2	Avg 5.35
			Sep 1990	Stk/Ell-Mkt/McA	5	4:50	5.5	
			Existing	Drumm-Larkin	21	17:23	5.3	
			TTRP Project	Drumm-Larkin	21	15:19	6.0	
	PM Peak	IB	Sep 1985	8th-1st	5	11:16	6.4	
			Sep 1990					
			Existing	S Van Ness-1st	7	16:46	5.5	
			Model No-Project	10th-Spear	7/21	17:00	5.9	
			Model Project	10th-Spear	7/21	15:00	6.7	
			TTRP Project	S Van Ness-1st	7	14:32	6.4	
		OB	Sep 1985	Front-7th	5	12:10	5.4	
			Sep 1990	Steuart-8th		14:58	6.2	
			Existing	Drumm-Larkin	21	20:49	4.4	
			Model No-Project	Steuart-9th	21	22:30	4.4	
			Model Project	Steuart-9th	21	18:30	5.4	
			TTRP Project	Drumm-Larkin	21	18:45	4.9	

Notes for table on previous page:

Speed:
The second from the right column gives the transit vehicle speeds on Market Street. However, for the recommended project, riders must walk farther to and from island stops. The "Net Speed" column tries to adjust for this. The average distance between stops currently is 940 feet inbound and 980 feet outbound. Under the proposed scenarios, this increases to 1730 feet inbound and 2080 feet outbound. To reach the nearest stop, transit riders will have to walk up to (on average) half these distances further to and from stops, or 395 feet more inbound and 550 feet more outbound. At an average walking speed of 4.5 feet per second, this will add up to 88 seconds to inbound trips and up to 122 seconds to outbound trips. The "Net Speed" column gives approximate equivalent speeds including the extra walks for the "Rapid" stops spacing scenarios. Walks to and from the Central Subway at Fourth Street would be at these outer limits. For slower walkers (3 feet per second is now used for signal timing), these equivalent speeds would be further reduced.

Scenarios:

- **Sep 1985:** This is the scenario identified as "Historic" by city staff. Data were extracted by city staff from a report prepared by the San Francisco Department of Public Works' Traffic Engineering Division in December 1985, and consistently identified as taken from an "After travel time study . . . conducted during September 1985." Curiously however, Muni records indicate line reassignments did not all go into effect until October 2, 1985, so this may have compromised DPW's analyses. Note also that when data were collected in 1985, Muni had not yet readjusted schedules, so it was not uncommon for operators to intentionally delay for extra time, to avoid risking discipline for running ahead of schedule, called "running sharp." Communications between Muni and the traffic engineers was not always great. DPW in 1985 was generally hostile to the project itself, as is reflected in their report's concerns about impacts on automobile traffic.
- **Sep 1990:** These data, added to city staff's table and highlighted in yellow, are taken from a videotape taken onboard buses for 11 trips up and down Market Street. Some trip times, most notably PM peak center island bus travel times, achieved higher speeds than in Sep 1985. Had conditions changed from 1985 to 1990? One cannot draw definitive conclusions, but more islands were in full operation, and the Market Street Thoroughfare Project, that rebuilt everything from Fremont to 11th Street, was completed in 1988 and 1989. And adversely affecting operations, after the 1989 Loma Prieta earthquake, signals were retimed at 9th Street to favor freeway traffic, the reason the Sep 1990 tapes only recorded operations east of 8th Street.
- **Model No-Project** and **Model Project:** These are the only four scenarios evaluated using the VISSIM traffic simulation tool.
- **TTRP:** The initials refer to SFMTA's Travel Time Reduction Project. This effort developed a set of shortcut estimates of trip time savings associated with various treatments, some of which, in our opinion, are not appropriate to Market Street. We believe, however, that SFMTA staff would agree that these are order-of-magnitude estimates, and should not be considered accurate predictions.

A last note concerns traffic signal cycle times.

Generally, shorter cycle times favor faster transit travel times, while longer cycle lengths favor higher volume general traffic (not transit traffic) throughput. While we understand that 75-second cycles have been imposed on Market Street to accommodate minimum pedestrian crossing times based on 3 fps, no transit-oriented justification has been provided for the 90-second cycles presently employed during peak periods. They should be returned to shorter cycle times, 75 seconds, if not 60 seconds, as part of the proposed project. Again, physical changes along Market Street cannot be properly evaluated independently of associated traffic signal strategies.

If 90-second cycle times were imposed to accommodate excessive right-turning traffic movements, then, if necessary, additional traffic restrictions should be imposed as necessary to reduce such movements so as to allow shorter cycle times to function efficiently.

4. F MARKET AND WHARVES FREQUENCIES

Page 4.B-62 includes the statement that "... the combination of the existing F-Market & Wharves streetcar line and the new F-Short streetcar line between the F-loop and Fisherman's Wharf would provide streetcar service as often as every 5 minutes.

This implies that service frequencies to 17th and Castro will not change. Please provide documentation of proposed F-Market & Wharves streetcar service both today and post-project west of the F-loop as far as Castro Street. Diminution of such service could constitute an additional significant impact on riders." (*Rachel Hyden, Executive Director, and Peter Straus, Member, Board of Directors, San Francisco Transit Riders, Letter, March 29, 2019 [O-SFTR1-4])*

"Good afternoon, Commissioners, my name is Rachel Hyden, executive director of San Francisco Transit Riders. For those of you who don't know, we are the city's grass roots advocate for excellent, affordable, and always running transit. We've been actively involved in this project for some time. We do have some concerns that this project isn't going far enough in terms of transit and transit riders. We did submit written comments that elaborate on some of the key things that I wanted to point out in front of you today.

First, the DEIR judges the transit impacts by a signal and inappropriate criteria, basically does the recommendation worsen congestion and cost more to operate? We think this is insulting to transit users." (*Rachel Hyden, Individual, Draft EIR Hearing Transcript, April 4, 2019 [O-SFTR2-1])*

"The recommended alternative includes some center lane and rapid stop spacing of over half a mile which is significant to people who use transit on Market Street. And as Mr. Miguel pointed out, there is no center lane stop at 4th Street, which is a direct connection for Central Subway so we're missing a huge opportunity here to connect the city.

And, lastly, despite the excessive stop spacing the projected travel times along Market Street are nothing to write home about. When actually considering the greater walking distance as it relates to stop removal, the net speed for transit riders is a sorry seven miles an hour or less. So, again, as I mentioned, we did submit our written comments, and I thank you for taking time to hear us today." (*Rachel Hyden, Individual, Draft EIR Hearing Transcript, April 4, 2019 [O-SFTR2-3])*

RESPONSE TR-3

The comments raise concerns regarding the impact of private vehicle diversion on bus transit, transit significance criteria, the signal timing assumptions, the proposed project's transit stop spacing and route allocations between curb and center island stops, track replacement, center travel lane widths, and the results of the transit travel time analysis.

This response provides information, clarification, and background information related to the transit impact analysis presented in the Draft EIR; the impacts were determined to be less than significant under 2020 baseline-plus-project conditions and significant and unavoidable under 2040 cumulative conditions. This analysis is supported by substantial evidence, and no additional analysis or mitigation measures are required.

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

- Transit Significance Criteria Used in the Transit Analysis
- Proposed Project Traffic Signal Timing Assumptions
- Proposed Project Transit Stop Spacing and Route Allocations
- Proposed Project Track Replacement and Center Travel Lane Widths
- Golden Gate Transit Travel Time Analysis
- F Market & Wharves Historic Streetcar Service Frequencies

The transit impact analysis was conducted consistent with the 2002 San Francisco Transportation Impact Analysis Guidelines (SF Guidelines) and the 2019 update to the SF Guidelines.[1] . The significance criteria for transit impacts is presented on Draft EIR Section 4.B, *Transportation and Circulation*, p. 4.B-34; the methodology used in the analysis is presented on Draft EIR pp. 4.B-37 to 4.B-41. Impact TR-4 on Draft EIR pp. 4.B-61 to 4.B-68 presents the transit impact analysis for baseline plus project conditions, while Impact C-TR-4 on Draft EIR pp. 4.B-97 to 4.B-101 presents the cumulative transit impact analysis.

Transit Significance Criteria Used in the Transit Analysis. As stated on Draft EIR p. 4.B-34, with respect to transit impacts, a project would have a significant effect on the environment if it would cause a substantial increase in operating costs or delays such that significant adverse impacts in transit service could result. As described on Draft EIR pp. 4.B-37 to 4.B-41, changes in transit travel times were estimated to determine whether the proposed project would increase existing transit travel times on individual routes so that additional transit vehicles would be required to maintain the frequency of service. In particular, the proposed project would have a

[1] San Francisco Planning Department, Transportation Impact Analysis Guidelines, February 2019. Available online at: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update

significant transit impact if transit travel times increases on a specific route would be greater than or equal to four minutes or half of the existing headway for Muni service, whichever is less, and half of the existing headway for regional service. The threshold of significance for transit impacts is based on the adopted City Charter section 8A.103 which established an 85 percent on-time performance service standard for Muni, which considers vehicles arriving more than four minutes beyond a published schedule time late, and the potential secondary impacts on the physical environment associated with riders who switch to automobile based modes when transit becomes less convenient. After a public process and thorough review of potential criteria and thresholds, the department used this criterion and threshold of significance in its subsequent comprehensive 2019 update to the SF Guidelines.

Comments state that the significance criterion for transit impact analysis should be different from that used in the EIR, including adding the travel time for persons walking to a stop to the transit travel time or calculating transit "rider speeds" to assess impacts of the proposed project. The EIR transit impact analysis is consistent with the SF Guidelines methodology for evaluating transit impacts. As noted below in the "Proposed Project Transit Stop Spacing and Route Allocation" section of Response TR-3, the proposed project would maintain local stop spacing and include more transit routes in the mixed-flow curb travel lane in the project corridor compared to existing conditions, allowing riders to choose the option of taking transit routes that use the local stops rather than increase their walking distance and time. Therefore, the comments do not raise significant environmental issues. Furthermore, adding travel time for persons walking to a stop or calculating transit "rider speeds" would not add informational value as it relates to the significant environmental effects of the project.

Proposed Project Traffic Signal Timing Assumptions. Comments state that the traffic signal cycle assumed in the analysis is not conducive to optimal transit flow along Market Street, that a 60-second signal cycle with synchronization should be used, provide extensive discussion of what the historic signal timing operations on Market Street were in the 1980s, and offer suggestions to accommodate pedestrian crossing needs within a 60-second cycle.

As noted on Draft EIR p. 4.B-27, in 2016 the SFMTA modified the traffic signal cycle duration on Market and Mission streets from 75 to 90 seconds during the weekday a.m. and p.m. peak periods (during weekday non-peak periods and on weekends, the signal cycle remained at 75 seconds) and provided protected phases and leading pedestrian intervals[2] at selected locations. These changes to the signal timing were made to improve pedestrian and transit

[2] A leading pedestrian interval is the signal phase at signalized intersections, which typically provides pedestrians a three- to five-second head start when entering an intersection with a corresponding green signal in the same direction of travel. For drivers, leading pedestrian intervals make it easier to see people walking in the intersection. Leading pedestrian intervals reinforce the right-of-way for pedestrians over turning vehicles.

safety in accordance with the City's Transit First and Vision Zero policies.[3] These signal timing changes are consistent with current national and state standards,[4] which have evolved over the years to improve safety for all modes of travel, including a decrease in the walking speed assumed for pedestrians to the currently assumed speed in San Francisco of 2.5 to 3 feet per second. If a lower cycle length, such as 60 seconds is chosen, the change would effectively reduce the amount of green time that can be provided to Market Street vehicular travel, including transit, and increase the likelihood of vehicles along Market Street being stopped at a red light. This could increase transit travel times along Market Street.

For example, at the intersection of Market/Stockton/Fourth/Ellis streets, the diagonal east-side crosswalk across Market Street is approximately 82 feet wide. The amount of time provided for a pedestrian to cross the street from curb to curb is determined by two standards:

- Total Pedestrian Crossing Time (the time from the start of the walk signal until the conflicting direction receives a green light) is calculated assuming a walking speed of 2.5 feet per second, and
- Pedestrian Clearance Time (the time from the start of the flashing red hand countdown until a conflicting direction receives a green light) is calculated assuming a walking speed of 3.0 feet per second.

Using the above 82-foot-wide crossing distance across Market Street, the total pedestrian crossing time that would need to be provided would be 33 seconds (82 feet divided by 2.5 feet per second) for the Stockton/Ellis street's signal phase (i.e., the phase during which pedestrians cross Market Street). If a 60-second cycle were to be provided at this intersection, there would be only 27 seconds available for Market Street (60 seconds less 33 seconds for the Stockton/Ellis streets signal phase). Factoring in the State's requirement that the clearance intervals (yellow and all-red phases) be a minimum of 8 seconds due to the intersection's wide width, Market Street would receive only 19 seconds (27 seconds less 8 seconds) of a green phase, which would substantially decrease the traffic capacity (the maximum number of vehicles in a lane that can pass a given point per hour) of Market Street and increase transit travel times.

The proposed project would provide a 90-second cycle at all intersections within the project corridor for those intersections that currently do not have a 90-second cycle during the weekday a.m. and p.m. peak periods, compared to under existing conditions. Therefore, per direction from SFMTA, the proposed project maintains the existing 90-second cycle for the weekday p.m.

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[3] As part of these efforts, the SFMTA also implemented the Safer Market Street Project, which included extension of transit-only lanes, turn restrictions, and supplemental safety treatments such as painted pedestrian safety zones, and enhanced bicycle lanes on Market Street.

[4] For example, the Transportation Research Board's *National Cooperative Highway Research Program (NCHRP) Report 812: Signal Timing Manual - Second Edition*, 2015 and the 2014 California Manual of Uniform Traffic Control Devices (2014 CA MUTCD), Revision 4.

peak-hour analysis of the proposed project. In addition, the longer cycle length assumed for the proposed project allows for the addition of protected phases for Muni to turn at key locations, eliminating Muni's current need to find gaps in pedestrian crossings to make turns (e.g., where eastbound buses turn right from Market Street toward the Salesforce Transit Center at First Street). There would also be separate phases for turning vehicles and bicyclists and pedestrians at key locations and leading pedestrian intervals where appropriate. Although it may be possible to accommodate some of the simpler Market Street intersections east of Ninth Street with 60-second cycles,[5] even today inconsistent cycle lengths along the project corridor would negatively affect transit flow, because each transition from one cycle length to another would not be coordinated. For all of the reasons described above, the 90-second signal cycle length is the appropriate cycle length for the proposed project, and the timing schemes included in the comment letters (i.e., from the 1985 Transit Thoroughfare Project, historic green-wave, etc.) are not feasible.

The p.m. peak-hour transit analysis assumed coordinated signals in the westbound direction (i.e., outbound away from downtown), based on the transit volumes and operations within the center travel lane Transit signal preemption, as raised in one comment, is not feasible with frequent transit service because transit vehicles would activate the preemption each cycle during the peak periods. Therefore, transit signal preemption on Market Street was not assumed in the analysis for baseline plus project conditions. Based on these assumptions regarding signal operations, the proposed project would reduce transit travel times by between 13 and 25 percent for transit traveling in the center lane and by between 12 and 18 percent for transit traveling in the curb lane.[6]

Proposed Project Transit Stop Spacing and Route Allocations. Comments raised concerns regarding the proposed project's transit stop spacing. A comment notes that the SFMTA did not follow the commenter's recommendation to adopt the "enhanced" stop spacings considered during the development of initial options and design concepts for Market Street and indicates that the enhanced stop spacings should be adopted to mitigate the perceived adverse transit impacts of the proposed project. Some comments question why an outbound center boarding island stop at the Market Street and Fourth Street intersection to provide a closer connection with the Central Subway was not included as part of the proposed project. Other comments state that the longer stop spacing and delays due to passenger loading and traffic signals would result in increased transit travel times compared with the information presented in the EIR.

[5] The intersection of Seventh Street/Charles J. Brenham Place/Market Street is a standard four-legged intersection where the crosswalks across Market Street are perpendicular to Market Street. At this intersection, less green time is required for pedestrian and vehicular movements than at more complex intersections with five or more legs that have diagonal crosswalks across Market Street, such as at the intersection of Fourth/Stockton/Ellis/Market streets.

[6] See Draft EIR Appendix 7, Attachment 6a, section titled VISSIM Travel Time Results.

Another comment states that the transit travel time discussion in the Draft EIR is inadequate because it does not present the combined average headway for all routes in each section of the Market Street corridor and requests a bus boarding bulb and a mitigation measure in the form of turn-backs[7] to mitigate impacts of the proposed project.

A comment refers to and provides information on the "enhanced" transit operation concepts from the Better Market Street Final Report that was published in 2013 and prepared as part of development of initial operations and design concepts for Market Street (included as Draft EIR Appendix 11). The 2013 Better Market Street Final Report presented three options, two of which included an "enhanced" transit operations concept, presented as concept 1. Subsequent to the 2013 report, additional design development was conducted by SFMTA and Public Works, which led to the three alternatives for the project, as documented on p. 3 of the 2016 initial study prepared for the proposed project (included as Draft EIR Appendix 2). The alternatives in the 2016 initial study included only the "rapid" transit operations concept (i.e., instead of the "enhanced" transit operations concept). Following publication of the 2016 initial study, SFMTA reviewed the routing plans and concluded that the rapid and local routes should be at the same stop to facilitate transfers between rapid and local routes, similar to the "enhanced" transit operations concept from the 2013 Better Market Street Final Report. In order to facilitate faster travel times for rapid routes, the number of stops was not increased compared to the "enhanced" concept, as the commenter requests. The initial options and design concepts from the 2013 Market Street Final Report and the three alternatives included in the 2016 initial study are discussed in Draft EIR Chapter 6, *Alternatives*, pp. 6-61 to 6-68, under Alternatives Considered but Rejected.

The proposed project would increase the transit stop spacing and walking distance for transit riders on routes operating in the center Muni-only lane (5 Fulton, 5R Fulton Rapid, 7X Noriega Express [inbound only], 9 San Bruno, 9R San Bruno Rapid, and the F Market & Wharves). The proposed project would reduce the number of center Muni-only lane transit stops from 23 (12 inbound, 11 outbound) to 11 (six inbound, five outbound) to provide this rapid service stop spacing.

The SFMTA recognizes that passengers, including the elderly and disabled, may have differing concerns with respect to transit stop location. Some may prioritize quicker travel time (as provided by Muni rapid routes), while others prefer more frequent stops to minimize walking distances (as provided by Muni local routes). Although the increased stop spacing for rapid routes operating in the center Muni-only lane may increase the physical effort required to reach a particular transit stop location, riders could choose local routes with stops on Market Street within their preferred walking distance and transfer to rapid routes that serve center boarding

[7] A turn-back is an early terminus on a bus route or rail line so that transit vehicles can turn around before the end of the route, and therefore transit vehicles do not operate along the full length of the route.

island stops at shared or adjacent stops. The proposed project would maintain the current local stop spacing and include more routes compared to existing conditions in the mixed-flow curb travel lane (i.e., 2 Clement, 6 Haight/Parnassus, 7 Haight/Noriega, 7 Noriega Express [outbound only], 19 Polk, 21 Hayes, 31 Balboa, 38 Geary, 38R Geary Rapid, L Taraval Owl, and N Judah Owl). The curb lane stop spacing would be consistent with SFMTA's local stop spacing standards,[8] while the center lane stop spacing would be consistent with rapid stop spacing elsewhere in the Muni system (e.g., 5R Fulton Rapid, 9R San Bruno Rapid, 14R Mission Rapid).[9]

Comments raised concerns that the proposed project would not include transit stops on Market Street at Fourth Street to facilitate the connection between the Fourth Street and Market Street surface routes and the Central Subway light rail line. In response to these comments, the project team is performing an analysis of various service and capital options to determine the feasibility of adding a westbound stop on Market Street at Fourth Street.

An option that the SFMTA is currently analyzing to provide for a closer connection to the Central Subway light rail line is a transit service concept as part of the proposed project that would have the westbound (outbound) 5 Fulton and the 9 San Bruno routes stop at the curbside stop between O'Farrell and Stockton streets. This option would require the proposed curbside stop on the north side of Market Street between O'Farrell and Stockton streets (which is approximately 250 feet east of the intersection of Fourth and Market streets) to be lengthened by approximately 40 feet. An on-street loading zone is not proposed on this segment of Market Street, and therefore this lengthening of the proposed stop would not affect commercial loading conditions.

With this additional westbound stop, the 5 Fulton and 9 San Bruno routes would leave the center Muni-only lane and maneuver to the curb stop, and then return to the center travel lane as these routes continue to the west. The additional stop and the weaving movement between the center and curb lanes for these two routes would add transit travel time to the travel times presented for the 5 Fulton and the 9 San Bruno routes in Table 4.B-4, Muni Transit Operations Analysis – 2020 Baseline plus Project Conditions – Weekday p.m. Peak Hour, on Draft EIR pp. 4.B-63 to 4.B-65 for 2020 baseline plus project conditions. However, this increase in travel time

[8] For informational purposes, SFMTA has not recently experienced a decrease in transit ridership due to increased stop spacing for other projects (e.g., implementation of the Muni Forward 14R Mission Rapid Project on Mission Street south of Duboce Avenue). A decrease in transit ridership could indicate that people switched to another travel mode that could lead to physical environmental impacts, but that did not occur for these other projects. SFMTA Short Range Transit Plan, Fiscal Year 2017 – Fiscal Year 2030, June 2017, page 40. Available online at https://www.sfmta.com/reports/short-range-transit-plan-fy-2017-fy-2030.

[9] Source: Rhodes, Michael. San Francisco Municipal Transportation Agency. July 10, 2019—personal communication with Jenny Delumo (Planning Department) regarding average daily ridership on the 14 Mission before and after stop removals.

for the 5 Fulton and 9 San Bruno due to the proposed transit service concept (as described above) would minimally affect the travel time savings for these routes that was presented in the draft EIR (more than four minutes compared to existing conditions as presented in Table 4.B-4). In other words, even with implementation of the proposed project with the additional stop for the 5 Fulton and 9 San Bruno, transit travel times for these routes would decrease compared to existing conditions. Therefore, with inclusion of this additional westbound stop for the 5 Fulton and 9 San Bruno as part of the proposed project, transit impacts would remain less than significant. All other transportation impacts would remain the same as for the proposed project with inclusion of the additional stop for the 5 Fulton and 9 San Bruno. No additional analyses or mitigation measures would be required. Please see Section H, *New Transit Service Concept* for *O'Farrell and Stockton Streets*, in Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*, for further discussion of environmental impacts and related text changes that have been incorporated into the Draft EIR.

To evaluate the demand of the aforementioned stop on Market Street at Fourth Street requested by the commenter, the SFMTA intends to collect data on passenger transfer volumes between the new Central Subway station at Union Square/Market Street and the existing outbound (westbound) stops on Market Street at Fourth Street once the Central Subway is operational. Construction of this segment of the proposed project at Fourth Street would not commence until after Central Subway service is initiated. If passenger transfer volumes between the Central Subway station and the existing bus stops warrant a shorter connection to the Central Subway, SFMTA will consider future changes to the bus stops and service at this location.

SFMTA will work with stakeholders, including the San Francisco Transit Riders, to further evaluate this proposed stop on Market Street at Fourth Street after Central Subway service is initiated. Notably, the walking connection between the Central Subway and the proposed project's nearest outbound stop for the 5 Fulton, 5R Fulton Rapid, 9 San Bruno, 9R San Bruno Rapid routes and the F Market & Wharves historic streetcar line would be similar to the connection for passengers transferring between the Central Subway and other Muni Metro lines at Market Street and Fourth Street. In addition, buses serving routes 6 Haight/Parnassus, 7 Haight/Noriega, 21 Hayes, and 31 Balboa in the curb lane on Market Street would directly serve Fourth Street under the proposed project, providing a shorter-distance transfer opportunity for people who prefer not to walk longer distances. However, SFMTA will continue to evaluate this additional requested stop in conjunction with community stakeholders once the Central Subway is in service.

Comments suggest that the transit travel-time results would be different if passenger boarding and traffic signal delays and routes operating concurrently along Market Street were appropriately considered. As described on Draft EIR p. 4.B-38, and in more detail in Draft EIR Appendix 7, Attachment 5, VISSIM microsimulation software was used to evaluate multimodal operations within the Market Street project corridor and estimate transit travel times with and

without the proposed project. The microsimulation model for the proposed project considers travel lane geometries, traffic signal characteristics, transit stop locations, transit routes and headways, vehicle volumes, turn restrictions, bicycle and pedestrian volumes, and variations in bus boarding times, among other physical roadway and travel behaviors of the various modes operating along Market Street. Thus, the transit travel-time analysis includes transit vehicle delays due to routes operating concurrently along Market Street, passenger boarding activities, and traffic signal timing.

Comments suggest that the transit travel-time headways should be combined on page 4.B-63 for all routes on a section and that the analysis would be different if bus bunching were appropriately considered. Because the model includes bus routes and stop characteristics, the analysis also accounts for any delay due to bunching from any bus operating in the same travel lane. Therefore, because the analysis includes delays that would be experienced by a transit vehicle for each route, presenting the combined headways and travel times for all routes running in each section, as suggested in a comment, is not required.

The proposed project would not include bus boarding bulbs along Market Street, as suggested in a comment; buses would stop within the travel lanes at existing and proposed boarding islands. The proposed project would continue to allow buses to pass each other. Because the buses would not need to merge back into traffic after making a stop within the travel lane, the benefits of a bus boarding bulb would not be applicable on Market Street.

A commenter's proposal to add turn-backs[10] for buses to address transit delay due to bus bunching is not warranted or appropriate. This is because, as discussed above, the analysis of the project's impacts on transit service appropriately accounts for potential delays due to bus bunching. Under 2020 baseline-plus-project conditions, the proposed project's impacts on transit would be less than significant, and no mitigation measures would be required. Therefore, mitigation measures, such as turn-backs, are not warranted. Under 2040 cumulative conditions, which accounts for increases in ridership and Muni Forward service improvements, the proposed project would contribute considerably to significant cumulative impacts on the Muni 27 Bryant route (but not other routes); however, turnbacks would not be appropriate because the 27 Bryant route crosses Market Street but does not travel along Market Street.

Proposed Project Track Replacement and Center Travel Lane Widths. In response to the comment that questioned the width of the proposed center transit travel lanes and the need to replace the existing tracks, Draft EIR Chapter 2, *Project Description*, p. 2-55, states that the

[10] A turn-back is an early terminus so that transit vehicles can turn around before the end of the route and therefore do not operate along the full length of the route. Turn-backs are typically used to provide higher frequency service along sections of transit routes with higher ridership and to reduce bus bunching for long routes.

existing tracks would be replaced with new tracks to maintain a state of good repair.[11] However, Alternative E, Core Elements Alternative, described on Draft EIR pp. 6-36 to 6-39, would not include full track replacement, among other infrastructure upgrades.

The existing travel lane widths along Market Street are presented in Figure 2-3, Proposed Project Transportation and Streetscape Improvements on Draft EIR pp. 2-23 to 2-42 and described on Draft EIR p. 2-22. As noted, the center travel lanes are currently 12 feet wide and 10.5 feet wide adjacent to the existing center boarding islands. These dimensions would generally be maintained with the proposed project. However, for travel lanes adjacent to BART portals, the proposed project would reduce the 12-foot-wide lanes to 11.5 feet to accommodate the five to 6.5-foot-wide proposed bikeway facility.

Golden Gate Transit Travel Time Analysis. Comments raise concerns that Golden Gate Transit bus routes operating on Mission Street would be affected by vehicle diversions from Market Street onto Mission Street. Another comment provided revised headway information for Golden Gate Transit routes compared to what was presented in the Draft EIR.

As described on Draft EIR p. 4.B-37, transit travel times were estimated for baseline and baseline plus project conditions for the Golden Gate Transit routes traveling through the transportation study area. For analytical purposes, the Golden Gate Transit routes were consolidated into three alignment groups to reflect the fact that they operate on similar roadways through the study area:

- SoMa routes (routes 24, 54, 92 and 93, which primarily travel south of Mission Street),
- Financial District routes (routes 2, 4, 8, 18, 24, 24X, 27, 38, 44, 54, 56, 58, 72, 72X, 74, 76, which travel north-south on Battery and Sansome streets through the Financial District), and
- Salesforce Transit Center routes (routes 30, 70, 101, 101X, which travel along Mission Street).

The baseline plus project conditions reflect the changes in traffic circulation that would result from implementation of the proposed project. Therefore, the transit impact analysis accounts for the effects of the diversion of vehicles from Market Street to Mission Street on the Golden Gate Transit Salesforce Transit Center routes on Mission Street (routes 30, 70, 101, 101X).

One comment suggested revisions to the headways for the Golden Gate Transit Financial District and Salesforce Transit Center routes in Table 4.B-4, Muni Transit Operating Analysis – 2020 Baseline-Plus-Project Conditions – Weekday P.M. Peak Hour, on Draft EIR pp. 4.B-63 to

[11] "State of good repair" is a term employed by the Federal Transit Administration related to transit infrastructure; it is achieved by having well-maintained, reliable transit infrastructure to provide safe, dependable, and accessible transit service.

4.B-65. Table 4.B-4 presented the 2020 baseline headway for the most frequent individual route that operates within each alignment group (listed above). This approach is consistent with the City's transit delay methodology, which evaluates impacts based on the headway for individual routes instead of the combined headway of multiple routes that operate on similar alignments.

The commenter noted that the 2020 baseline headway for the outbound Financial District alignment should be approximately 90 seconds instead of 12 minutes as shown in Table 4.B-4 of the Draft EIR. At the time of the analysis presented in the DEIR, Golden Gate Transit Route 4 was the most frequent Golden Gate Transit Financial District route, which operated with approximately 12-minute headways during the p.m. peak hour. The 90 seconds headway requested by the commenter represents the combined headway for all the Financial District routes (routes 2, 4, 8, 18, 24, 24X, 27, 38, 44, 54, 56, 58, 72, 72X, 74, 76), instead of the Financial District route with the shortest headway (Route 4). Since the analysis was completed, the headway for Route 4 changed from 12 minutes to approximately nine minutes during the p.m. peak hour, as shown on the Golden Gate Transit website.[12] Therefore, Draft EIR table 4.B-4 was revised to show a nine minute headway for the Golden Gate Transit Financial District routes (see below Table 4.B-4), rather than 90 seconds as suggested by the commenter, to be consistent with the City's transit delay methodology and the current Golden Gate Transit schedule.

The commenter further notes that for the Salesforce Transit Center alignment, the outbound baseline for Golden Gate Transit should be 12 minutes instead of 30 minutes as shown in Table 4.B-4 of the Draft EIR. At the time of the analysis presented in the DEIR, Route 101 was the most frequent Golden Gate Transit Financial District route, which operated with approximately 30-minute headways during the p.m. peak hour. The 12-minute headway requested by the commenter represents the combined headway for all the Salesforce Transit Center routes (routes 30, 70, 101, and 101X), instead of the Salesforce Transit Center route with the shortest headway (Route 101/101X). Since the analysis was completed, the headway for Route 101/101X changed from 30 minutes to approximately 20 minutes during the p.m. peak hour, as shown on the Golden Gate Transit website.[11] Therefore, Draft EIR table 4.B-4 was revised to show a 20 minute headway for the Golden Gate Transit Salesforce Transit Center routes (see below Table 4.B-4), rather than 12 minutes as suggested by the commenter, to be consistent with the City's transit delay methodology and the current Golden Gate Transit schedule.

To address the confusion raised by the commenter about whether the combined or individual headways should be shown in Table 4.B-4, footnote "f" was revised to clarify that the headway presented for each Golden Gate Transit alignment grouping reflects the individual route within the grouping with the shortest headway.

[12] http://goldengatetransit.org/schedules/current/index.php; Accessed by Fehr & Peers on July 8, 2019.

Although the headways presented in Table 4.B-4, Muni Transit Operating Analysis – 2020 Baseline-Plus-Project Conditions – Weekday P.M. Peak Hour, on Draft EIR pp. 4.B-63 to 4.B-65 were out of date, the operations models used to develop the project-related transit travel times included Golden Gate Transit headways consistent with those provided in the comment. For example, according to the Golden Gate Transit website, 68 buses are scheduled to operate from 4 p.m. to 6 p.m. on the 16 Financial District routes (routes 2, 4, 8, 18, 24, 24X, 27, 38, 44, 54, 56, 58, 72, 72X, 74, 76). This results in a combined headway of 1 minute 46 seconds during the two-hour peak period from the operations model. The operations models assumed 60 buses (or a combined headway of 2 minutes) during this period, based on information available at the time. The addition of four buses an hour, or one bus every 15 minutes, would not affect the results of the operations analysis substantially or the conclusions in the Draft EIR. This is because the addition of four buses per hour represents a small fraction of the overall traffic volumes (less than 0.5 percent on Fremont Street). Therefore, the revisions to Table 4.B-4 do not change the transit travel time analysis. As stated in the comment, these revisions to Table 4.B-4 do not change the impact determination for Golden Gate Transit routes (i.e., less than significant impacts on Golden Gate Transit operations).

Updates are as follows (deleted text is shown as ~~strikethrough~~ and new text is double underlined):

TABLE 4.B-4. MUNI TRANSIT OPERATIONS ANALYSIS – 2020 BASELINE-PLUS-PROJECT CONDITIONS – WEEKDAY P.M. PEAK HOUR[13]

		2020 Baseline-plus-Project Conditions	
Route/Direction[a]	**2020 Baseline Headways (min:sec)**	**Threshold**[b] **(min:sec)**	**Travel Time Change (min:sec)**
***Regional Routes[e,f]			
Golden Gate Transit 24, 54, 92, 93 routes – inbound[f]	15:00	7:30	0:37
Golden Gate Transit 24, 54, 92, 93 routes – outbound	15:00	7:30	2:52
Golden Gate Transit Financial District routes – inbound	9:00 ~~12:00~~	4:30 ~~6:00~~	-2:59
Golden Gate Transit Financial District routes – outbound	9:00 ~~12:00~~	4:30 ~~6:00~~	0:01
Golden Gate Transit Salesforce Transit Center routes – inbound	20:00 ~~30:00~~	10:00 ~~15:00~~	-1:05
Golden Gate Transit Salesforce Transit Center routes – outbound	20:00 ~~30:00~~	10:00 ~~15:00~~	1:40
SamTrans 292 and KX – inbound[g]	20:00	10:00	-1:11
SamTrans 292 and KX – outbound	20:00	10:00	-0:47

[13] Only portions of this table that have been revised from the Draft EIR are reproduced; portions of the table that are not reproduced remain unchanged.

f. Within the transportation study area, Golden Gate Transit routes operate on the following streets: Routes 24, 54, 92, 93 routes operate on Hyde, Eighth, and Folsom in the inbound direction and McAllister, Seventh, and Harrison streets in the outbound direction; Financial District routes operate on Battery, First, and Howard streets in the inbound direction and Pine, Sansome, Fremont, Folsom streets in the outbound direction; Salesforce Transit Center routes operate on Hyde, Eighth, and Mission streets in the inbound direction and McAllister, Seventh, and Mission streets in the outbound direction. The 2020 baseline headways for the Golden Gate Transit groupings reflect the headway for the Golden Gate Transit route within the grouping with the shortest headway.

This change is also included in RTC Chapter 5, *Draft EIR Revisions*. These revisions do not change the analysis or conclusions presented in the EIR.

F Market & Wharves Historic Streetcar Service Frequencies. A comment requests documentation that the F Market & Wharves streetcar line service west of the proposed F-loop would not change as a result of the proposed project. No changes to service west of the F-loop (i.e., to/from Castro Street) are proposed as part of the project, and therefore there would be no diminution of service on the streetcar line in this segment as part of the project.

As discussed in the Muni Transit Stop Spacing and Service discussion on Draft EIR Chapter 2, *Project Description*, p. 2-51, the proposed project would implement a counterclockwise F-Line track loop (F-loop). With construction of the F-loop, a new F-Short line would be implemented to provide service between the F-loop and Fisherman's Wharf. The proposed new F-Short line is expected to operate as early as 7 a.m. to as late as 7 p.m. daily. As shown in Table 2-1 on p. 2-52 in Draft EIR Chapter 2, *Project Description*, F-Short service would be provided as often as every 10 minutes (six streetcars per hour) during peak hours. Therefore, the combination of the existing F Market & Wharves streetcar line and the new F-Short streetcar line between the F-loop and Fisherman's Wharf would provide streetcar service as often as every 5 minutes. Detailed transit travel-time analysis is included in Draft EIR Appendix 7, Attachment 6. The analysis assumed existing service west of the F-loop and the proposed increased service frequencies between the F-loop and Fisherman's Wharf. Therefore, the transit impact analysis presented in the Draft EIR adequately addresses project impacts, and additional analysis of transit travel times is not required.

COMMENT TR-4: WALKING/ACCESSIBILITY AND BICYCLE IMPACTS

- A-SFPC-1
- I-Anne-1
- I-Avallone-2
- I-Edington-1
- I-Hong-5
- I-Hong-9

- I-Hyland-1
- I-Katz-10
- I-McCreary-1
- I-Natvig-4
- I-Natvig-11
- I-Nawbary-1
- O-SFBC2-2
- O-WSF1-6
- O-WSF2-4
- O-WSF2-6

"Thank you. I believe that the EIR, as it's presented, is complex, it's complete, and it's an amazing piece of work because we rarely ever have something which is so physical yet transparent and presents changes in transportation. I hear residents and concerns that I wrote down for myself. Ms. DeLuca spoke about safety for pedestrians. I believe that the widths of sidewalks are something I would personally like to see mathematically modeled. There is indeed a tool that -- which we use when we design new communities that allows you to take the desired comfortable pedestrian density and determine result and pedestrian sidewalk width.

In this particular case, as she mentioned, it was 15 feet dedicated to pedestrians only and nine feet potentially was one of which we have many which animate indeed the street. It would be very interesting to see what kind of conflict points we create if we do not have sufficient widths.

Because even today, when you walk at lunchtime on Market Street, there is a tremendous amount of congestion with a lot of frustration between people wanting to stop and talk to their friends at lunch, and those who have to rush someplace else. It's really almost like we're in Grand Central Station on every block, and I would like to see that thought about both for the safety but also the enjoyment of being on a revitalized Market Street." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript, April 4, 2019 [A-SFPC-1])*

"Having seen the proposed design for sidewalk ‑ level bicycle paths, I note that there doesn't seem to be much besides the occasional tree or bench to keep cyclists from riding through or across the pedestrian paths. As a resident of the area, a wheelchair user, and someone who's been severely hit by a cyclist who was riding illegally on a sidewalk three times in the past ten years, I'd like to see a bit more of a barrier, such as the white plastic sticks used for existing bike

lanes, or pedestrian bulb‐outs nearby (or some more aesthetic alternative)." (*K. M. Anne, Individual, Email, March 13, 2019 [I-Anne-1])*

"The changes proposed in the DEIR are great and I'd like to point out three more improvements towards our cyclist and pedestrian safety goals for the project team to really consider and incorporate into the design.

1. Bike Safety: Bike path merge from Battery Street to westbound Market. I see there is a proposal to remove the Battery street extension "bridge" at the one Bush Street garage access point. As much as I support that proposed vehicle path restriction, it also takes away the shared bike lane. There are several cyclist who use Battery street, me being one of them, and the removal of that creates a more dangerous bike connection to market by having to merge, and most likely filter through, massive grid lock at this intersection at PM rush and conflicting with parking garage exit ramp. See diagram attached. I propose creating a dedicated bike lane extension from Battery to Market over the One Bush street garage exit ramp at part of the new pedestrian plaza." (*Vince Avallone, Individual, Email, March 24, 2019 [I-Avallone-2])*

"Please be aware that cyclist are very dangerous because they don't have to obey traffic signals. If this passes that must be corrected. Pedestrians are at great risk crossing from the island to the sidewalk as it is today." (*Mary Edington, Individual, Email, March 13, 2019 [I-Edington-1])*

"• There needs to be a strong focus at the major intersections along Market Street; especially at 3rd, 4th, 5thd, 6th and 7th, streets. Folks use these busy cross to get to the city's convention center, Moscone Center and other parts of Market Street." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-5])*

"• Bike and Scooter racks need to be consistent. Right now pedestrians are tripping over these bikes and scooter and etc.

•Tree grates in some cases are not flush with the walk ways, pedestrian are tripping over them." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-9])*

"I'm writing to add an additional comment for the record on the Better Market Street Project. While I am the President of the Historic Preservation Commission (HPC), and our Commission has already reviewed this project and submitted a letter, I am representing myself in this letter.

Upon further reflection since this was heard at the HPC, I'm concerned that the proposed project is reducing the pedestrian pathway along Market Street by as much as 50%, as well as

mixing bicycles to this zone. Market Street is the main artery of our city and historically has been a pedestrian space from the curb to the buildings. While transit, autos and bicycles were located between the curbs.

Placing bicycles onto the historic pedestrian zone will significantly alter the pedestrian experience. It will also decrease safety with the potential of collisions between bicycles and pedestrians." (*Aaron Jon Hyland, FAIA, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hyland-1])*

"physical barriers to left turns (streetcar tracks notoriously catch bike tires); and conflicts with heavy pedestrian traffic at intersections and mid-blocks. (And because this project unfortunately proposes sidewalk-level bike lanes – instead of true Copenhagen-style lanes, at an intermediate level between the sidewalk and the street – conflicts between fast-moving cyclists and straying pedestrians will likely get worse.)" (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-10])*

"I'm writing to share my comments for the Better Market Street Draft EIR.

The draft EIR has omitted a study of potential pedestrian‐bicyclist conflicts by re‐locating bike lanes to the sidewalk elevation without a continuous separation. The study does not account that on average bikes are traveling much faster in the City. Bikes are traveling much faster because of the wide adoption of electric motorized bikes. Re‐locating bikes to the sidewalk elevation will result in much more accidents.

I hope the study can review this conflict and design changes will be adopted." (*Patrick McCreary, Individual, Email, March 13, 2019, [I-McCreary-1])*

"and injuries to pedestrians and bicyclists, adding to the adverse environmental impacts of the project." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-4])*

" - - - It is difficult to fathom the net advantages of the bike proposals for bicyclists. The plan calls for narrowing the curb lane, widening the sidewalk, narrowing the pedestrian area, and placing the bike lane at pedestrian level. The problems include competition with pedestrians, reduction of the pedestrian area, dipping of the bikeway at the truck loading zones, cutting the truck loading zones into the pedestrian right‐of‐way, weaving the bikeway at the curb lane, mid‐block loading islands and BART entrances, squeezing of the bikeway at the BART entrances, the hazard of bikes dropping off the bikeway into the curb lane in‐front of autos, possible collision with BART entrance parapets, and the possible launching of bikers down the

BART staircases at 5th and New Montgomery inbound and 4th outbound. In addition, the mid‐block boarding islands proposed to serve the curb‐lane buses with bike lanes located between the islands and the curbs would tend to create the attractive nuisance of pedestrians walking to the islands into the path of bike riders. The raised bike lane proposal does not appear to do anything to improve safety for bikes at intersections where most of the threats to bicyclist would appear to exist." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-11])*

"I hope the bike lanes are separated from the sidewalk. I don't want pedestrians wandering into the bike lane aimlessly and cyclists weaving through pedestrians on the sidewalk." *(Susan Nawbary, Individual, Email, March 15, 2019 [I-Nawbary-1]*

The Better Market Street DEIR, however, does not fully address some of the potential safety concerns that the proposed project's operation and construction could create.

Specifically, from Ninth to Octavia the proposed project does not go as far as it could in providing safe facilities for people biking and private vehicle restrictions compared with the Western Variant alternative. The Class II bike lane proposed for the eastbound approach to South Van Ness Avenue will place people biking closer to vehicles on a bike route that aims to provide the highest level of safety for people biking. Furthermore, the danger posed by streetcar tracks, a recurring hazard on Market Street, would be exacerbated on the eastbound approach to 11th street. The floating protected bike lane design limits the amount of room available for people biking to cross the streetcar tracks at a safe angle. While the proposed project mitigates the danger from vehicles it does not fully address the threat posed by streetcar tracks." *(Charles Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-2])*

"One more thing, the sidewalks on Market Street technically are going to be widened in this project, but they're not going to be widened for people walking in this project. They're actually going to narrow for people walking. And we really want to make sure the project team ensures everyone walking on Market Street and all the folks that are going to be walk in the future -- because there's going to be a lot more – can do that comfortably and accessibly.

The draft EIR states that east of Van Ness, most of the sidewalk throughway will be 15 feet, but that doesn't account for cafe areas, which sometimes, whether or not they're supposed to, take up 9 feet. So, there are going to be certain places on the corridor where we only have six to eight feet to actually pass through.

So, we're really concerned about that, and we want the project team to get that right, to wiggle as much space out as we can, because we need to make -- keep Market Street as a great place for

pedestrians." (*Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-6])*

"One of the Project's Mobility goals is to "Provide an appropriate pedestrian throughway" (2-2).

In terms of the impact of the proposed project on pedestrians, the Draft EIR concludes:

> In summary, implementation of the proposed project would accommodate people walking along and across Market Street, improve visibility and safety of people walking and crossing the street, and would not result in hazardous conditions or present barriers to people walking. Therefore, for the above reasons, impacts of the proposed project on people walking would be less than significant. (4B-74)

Walk SF is concerned that the Draft EIR does not contain sufficient analysis to support the conclusion that the proposed project will adequately accommodate people walking and not present barriers to walking.

1. Width of the Sidewalk

The EIR document states multiple times that "Sidewalks east of Van Ness Avenue would typically provide a 15-foot-wide through (i.e., walking) zone for pedestrians" (2-61). However, what isn't taken into consideration is the building/frontage zone as well as the through-zone. Frontage zones are typically 5-6 feet wide and need to accommodate opening/dosing doors, lines for events, and cafe seating, among other uses.

Walk San Francisco did an analysis of frontage zones between 5th and 8th Streets that had cafe seating. We found eight businesses with cafe seating, and these areas occupied between 6 and 9 feet of sidewalk space. Subtracting this cafe seating area from the 15-foot-wide pedestrian through-zone detailed in the Draft EIR results in actual pedestrian through-zones between 9 feet and 6 feet- not 15 feet.

Walk SF encourages activation of the street, like cafe seating, however, we don't want this to interfere with the sidewalk safety and through-zones. Along with cafe seating, there are other pinch points along the project corridor, including BART portals. At these locations, the pedestrians through -zones will likely be less than 15 feet.

The calculation of pedestrian through -zones in the DEIR should factor in these obstacles, especially obstacles like BART portals that are unlikely to be moved.

2. Pedestrian Level of Service Analysis

The DEIR presents an informational-only pedestrian level of service (LOS) analysis in the body of the document that finds that:

> With implementation of the proposed project, the sidewalk level of service at the nine study locations throughout the project corridor would be LOS of D or better, which reflects

> conditions where pedestrians can travel in their desired path, but where the speed and ability to pass slower pedestrians may be restricted. (4.B-74)

It is unclear, however, what this calculation is based on. (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-4])*

The analysis of future pedestrian throughput, as shown in a table in Appendix 7, finds that five intersections will have a pedestrian LOS of D or higher in 2040. The DEIR states:

> The number of people walking would increase between completion of the proposed project and the 2040 cumulative conditions due to projected growth along and near Market Street. Under 2040 cumulative conditions, with projected increases in the number of people walking along Market Street (i.e., about 20 percent increase over 2020 baseline conditions) and the reduction in sidewalk widths, the sidewalks would be more crowded. At locations with high volumes of people walking (e.g., the north side of Market Street between Montgomery and Sutter streets, or between Fifth and Fourth streets), conditions for people walking would be more constrained, with friction and interaction between people. However, adequate sidewalk width would be provided to accommodate people walking without interfering with accessibility along Market Street or creating a safety concern for people walking. (4B-102)

There is no evidence to support the DEIR's contention that the sidewalk width would be adequately wide to not interfere with accessibility in 2040. An LOS of D reflects conditions in which "pedestrians can travel in their desired path, but where the speed and ability to pass slower pedestrians may be restricted (4.B-74)." At pinch points along the corridor, where there are BART portals for instance, the pedestrian through-zone could be as narrow as 6 feet. To be confined to a 6-foot area and not be able to pass people, which could be especially difficult for wheelchair users, does seem like it could 'interfere with accessibility.'" (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-6])*

RESPONSE TR-4

The comments raise concerns regarding the effect of the proposed project's features on safety for people walking and bicycling. More specifically, these comments request more information on safety for people walking on project corridor sidewalks, at intersections and adjacent to the proposed bikeway; and sidewalk widths and sidewalk crowding information. A comment raised concerns that the impact analysis for walking/accessibility did not demonstrate that the proposed project would adequately accommodate people walking and not present barriers to walking. A comment also raised issues related to specific movements of bicyclists at the Battery Street crossing between Bush and Market streets.

The response provides information and clarification of the walking/accessibility and bicycle impact analyses presented in the Draft EIR, and which were determined to be less than significant. This analysis is supported by substantial evidence and no additional analysis or mitigation measures are required.

Responses to the walking/accessibility and bicycle impact analysis comments are organized by the following subtopics:

- Walking/Accessibility Significance Criteria and Impact Assessment
- Safety for People Walking
- Accessibility for People Walking Due to Crowding
- Comfort for People Walking Due to Crowding
- Safety for People Bicycling
- Battery Street Bridge Configuration

As presented on Draft EIR p. 4.B-25, the walking/accessibility and bicycle impact analyses were conducted consistent with the SF Guidelines. The significance criteria for walking/accessibility and bicycle impacts are presented on Draft EIR p. 4.B-34; the methodology used in the analysis is presented on Draft EIR p 4.B-41. Impact TR-5 on Draft EIR pp. 4.B-68 to 4.B-77 presents the walking/accessibility impact analysis for baseline plus project conditions for the proposed project and Western Variant, while Impact C-TR-5 on Draft EIR pp. 4B-101 and 4.B-102 presents the walking/accessibility impact analysis under cumulative conditions. Impact TR-6 on Draft EIR pp. 4.B-77 to 4.B-83 presents the bicycle impact analysis for baseline plus project conditions for the proposed project and Western Variant, while Impact C-TR-6 on Draft EIR pp. 4B-103 and 4.B-104 presents the bicycle impact analysis under cumulative conditions.

Walking/Accessibility Significance Criteria and Impact Assessment. As stated on Draft EIR p. 4.B-34, with respect to walking/accessibility impacts, a project would have a significant effect on the environment if it would create potentially hazardous conditions for people walking, or otherwise interfere with accessibility of people walking to and from the project site and adjoining areas. The SF Guidelines further define hazards as, "engineering aspects of a project (e.g., speed, turning movements, complex designs, substantial distance between street crossings, sight lines) that may cause a greater risk of collisions that result in serious or fatal physical injury than a typical project. This significance criterion focuses on hazards that could reasonably stem from the project itself, beyond collisions that may result from non-engineering aspects or the transportation system as a whole."[14]

[14] San Francisco Planning Department (2019) *Transportation Impact Analysis Guidelines for Walks/Accessibility* (Appendix G) p.G-3.

Impact TR-5 on Draft EIR pp. 4.B-68 to 4.B-77 first identifies the features of the proposed project that would modify the pedestrian network and affect people walking, and follows with an impact assessment considering the walking/accessibility significance criteria provided above. The assessment includes a discussion of impacts related to sidewalk reconfiguration to accommodate the proposed bikeway and other improvements, changes to traffic signals, new sidewalk bulb-outs, boarding island and curbside stops, relocation of the BART/Muni elevator at the Civic Center station, other streetscape improvements, and effects of the proposed vehicle access restrictions. The analysis found that implementation of the proposed project would adequately accommodate people walking along and across Market Street, improve visibility and safety of people walking and crossing the street, and would not result in potentially hazardous conditions or present barriers to people walking. Impact C-TR-5 on Draft EIR pp. 4.B-101 to 102 provides the same analysis, but under cumulative conditions, and found that the proposed project would result in less-than-significant cumulative walking/accessibility impacts. Therefore, for the above reasons, impacts of the proposed project on people walking would be less than significant.

Safety for People Walking. Comments expressed concern regarding safety for people walking at intersections and within crosswalks, and about how the proposed project would separate the proposed sidewalk-level protected bikeway from the pedestrian through zone.

Proposed project changes to Market Street that would enhance the pedestrian environment and safety are described in Draft EIR Chapter 2, *Project Description*. All intersections within the Market Street project corridor would be reconfigured and include treatments to facilitate travel for people walking. The proposed project would simplify pedestrian crossings at intersections along the Market Street project corridor by eliminating indirect crossings[15] on the north side of Market Street (Sutter/Sansome), removing a two-stage crossing (Ninth/Hayes/Larkin), adding one midblock crosswalk (between Powell and Ellis streets), adding missing crosswalks at an intersections (Main/Drumm, Jones/McAllister, 11th), realigning diagonal crosswalks to shorter direct alignments (New Montgomery, O'Farrell/Grant, Fourth/Stockton/Ellis, Turk/Mason, Sixth/Golden Gate/Taylor), and converting a driveway crossing to a sidewalk-level crossing (One Bush Street building). To accommodate the proposed project changes for the bikeway and transit service, the proposed project would remove existing crosswalks at two intersections (i.e., at 12th and Market streets, and at Turk and Mason streets). New crosswalks would be provided at all intersections within the Market Street project corridor, and signage and traffic striping would be added to reinforce the turn restrictions and provide clear demarcation for vehicles,

[15] An indirect crossing is one where people walking have to travel out of their way in order to cross the street on which they are walking on. For example, on the north side of Market Street at Sutter Street, pedestrians walking and continuing westbound along Market Street need to travel west along Sutter Street to the intersection with Sansome Street, where they cross Sutter Street to continue westbound along Market Street.

transit, bicyclists, and people walking. The project would install bulb-outs where possible to shorten the crossings of the side streets, although due to the proposed sidewalk narrowing to accommodate the sidewalk-level bikeway, the crossings across Market Street would generally be lengthened. The signal timing provided for people crossing at Market Street would be extended to account for the longer crossing distance, and traffic signals would include accessible pedestrian signal timing buttons. A new signalized midblock crosswalk across Market Street between Powell and Ellis streets would shorten the distance for people crossing across Market Street at a signalized crossing.

Regarding separation between facilities for people walking versus bicycling, the proposed project would more clearly define the bicycle right-of-way along Market Street and at intersections compared to existing conditions (see Figure 2-4, Existing and Proposed Project Typical Mid-Block Cross Section of Market Street, on Draft EIR p. 2-43), as follows:

- On the side of the bikeway adjacent to the pedestrian through zone[16], furnishings, signage, bicycle racks, and other vertical obstructions in the furnishing zones and Streetlife Zones[17] (four to 10 feet in width) would buffer bikeways from pedestrian through zones. The Streetlife Zones would serve a dual purpose of providing sidewalk activation for people walking, and also containing vertical obstructions such as furnishing, signage, and bicycle racks that would deter people on bicycles from riding into the pedestrian through zone. In addition, there would be a 1- to 3-foot-wide ADA-compliant feature separating the pedestrian through zone and the bikeway so that people with limited vision would be able to avoid accidentally crossing into the bikeway.
- At particularly constrained sidewalk pinch points next to BART/Muni portals and loading zones, the bikeway would not be placed next to the pedestrian through zone. Rather, the bikeway would always be buffered from the pedestrian through zone by either the station portal or the loading zone.
- At curbside transit stops, the protected bikeway would be placed between the transit stop and the pedestrian through zone. Boarding and alighting transit customers would be separated from the bikeway with a raised railing-like feature and provided a designated place to cross the bikeway. On the sidewalk between the bikeway and the

[16] As defined in the Better Streets Plan, the pedestrian through zone is the portion of the sidewalk intended for pedestrian travel only and should be kept clear of other obstacles.

[17] Furnishing zones, also referred to as Streetlife Zones, are sidewalk areas that help create a buffer between the pedestrian access route and bikeways or travel lanes. These zones accommodate features such as street trees, street furniture, benches, moveable tables and chairs, sidewalk planting areas, small retail stands (e.g., flower sellers, food carts), public restrooms, advertising kiosks, wayfinding signs, real-time transit information, newsstands, bike-share stations, dockless bicycle-/scooter-share parking, and bicycle racks.

pedestrian through zone, there would be the 3-foot buffer zone provided except at the aforementioned designated crossing places where there would be crosswalk markings and other features.

Other proposed measures that would contribute to delineating the bicycle right-of-way include extending a designated bicycle facility east of Eighth Street, where the bikeway is currently a shared lane facility; the use of bicycle signals and two-stage left-turn queue boxes at most intersections; leading bicycle signal intervals at some intersections; and a bicycle queuing area ahead of stopped vehicles (i.e., a bike box) at one intersection. Education and enforcement of traffic laws would be a concurrent and ongoing effort along with the proposed project for all users of various travel modes of travel (i.e., people walking, bicycling, and on scooters, as well as drivers).

One comment suggested that the proposed project protected bikeway would be more effective in preventing bicycle-pedestrian conflicts if it were constructed at an intermediate grade between the roadway grade and the sidewalk-level (e.g., at three to four inches above roadway grade). However, a pilot project, the SFMTA's Market Street Raised Bikeway Demonstration Project, implemented by the City on Market Street showed that an intermediate 3-to-4-inch grade bicycle facility was not effective in deterring vehicles from driving onto the bikeway compared to a protected bikeway with a six-inch curb (i.e., at sidewalk-level). Therefore, the sponsor team eliminated that concept.[18]

Accessibility for People Walking Due to Crowding. Comments raised concern about potential sidewalk crowding with the proposed project's narrowing of the existing sidewalk along the project corridor to accommodate the bikeway under baseline and cumulative conditions. As noted on Draft EIR p. 4.B-7, Market Street is identified in the Better Street Plan as a ceremonial street (p. 82). The City does not set forth a minimum or recommended sidewalk width for ceremonial streets. Among comparable street standards, commercial streets and multi-way boulevards have 12-feet minimum and 15-feet recommended sidewalk widths, and parkways have 12-feet sidewalk minimum and 17-feet sidewalk recommended widths.[19] These widths are inclusive of the five sidewalk zones identified by the Better Streets Plan from property line to curb: frontage zone, throughway zone, furnishing zone, edge zone and extension zone.[20]

As noted in Draft EIR Chapter 2, *Project Description*, p. 2-61, the proposed project would provide through-zone/access routes for people walking that would be clear of all vertical obstructions. For instance, an approximately 15 feet wide pedestrian through zone east of Van Ness Avenue and an approximately 10 feet wide pedestrian through zone west of Van Ness Avenue. Where

[18] SFMTA, Market Street Raised Bikeway Demonstration Project Findings Report, January 2017.

[19] City of San Francisco (2010) *Better Streets Plan*. Figure 4.3. p. 99.

[20] City of San Francisco (2010) p. 98.

sidewalk widths allow, the proposed project would include a separate furnishing zone or "Streetlife Zone" between four and 10 feet wide. These Streetlife Zones would allow the installation of features such as street trees, racks for bicycles and scooters, street furniture, café dining areas, and small retail stands.[21] Thus, the proposed project would move existing vertical obstacles out of the pedestrian through zone and into designated Streetlife Zones. These zones would also be locations for people to congregate. Therefore, the city did not subtract sidewalk widths from items such as sidewalk seating in pedestrian through zone areas, as suggested by comments. Where sidewalk widths are constrained (e.g., adjacent to BART/Muni station portals) the entirety of the sidewalk would be allocated to the pedestrian through zone.

Existing sidewalk widths on the north and south sides of Market Street typically range from 15 to 35 feet. Sidewalk widths vary by segment of the Market Street project corridor. Between Octavia Boulevard and Van Ness/South Van Ness avenues, the existing sidewalks are typically between 16 and 25 feet wide on each side of Market Street. On most blocks the most constrained sidewalk areas, or pinch points, are 16 feet wide. For the entire segment of Market Street between Octavia Boulevard and Van Ness/South Van Ness avenues, the narrowest pinch points occur adjacent to Muni station portals, which are nine feet wide at the Van Ness Muni station portals. The proposed project would reduce the sidewalk to between 12 and 25 feet on the north side and to between 10 feet and 25 feet on the south side of Market Street and Van Ness Avenue. At pinch points for most blocks, the proposed project would either maintain the existing sidewalk width or narrow the sidewalk by up to approximately six feet for the proposed bikeway. At the Muni station portals, the proposed project would maintain the existing sidewalk width at nine feet.

Between Van Ness/South Van Ness avenues and Eighth Street, the existing sidewalks on Market Street are typically between 25 and 26 feet on each side. There are no Muni or BART station portals in this segment. The proposed project would reduce the sidewalk width on the north to approximately 20 feet and on the south to between 16 and 22 feet to accommodate the proposed bikeway and loading zones.

Between Eighth and Steuart streets, Market Street sidewalks typically measure between 26 to 35 feet on each side. On the north side, existing pinch points typically occur at loading zones (typically 26-foot-wide sidewalks) and at BART/Muni station portals (typically 15-foot-wide sidewalks). The proposed project would typically reduce sidewalk widths to between 20 and 25 feet wide, with the most constrained sections narrowing to about 15 feet. These constrained sidewalk areas occur largely between Turk/Mason and Sutter/Sansome streets, and between Fremont/Front and Pine/Davis/Beale streets.

[21] San Francisco Planning Department (2019) *Better Market Street Project EIR* Volume 1. p.2-61.

Existing pinch point locations on the segment of Market Street between Eighth to Steuart streets typically occur adjacent to BART/Muni station portals. On the north side, existing pinch point sidewalk widths are between 13 and 15 feet; the proposed project would maintain existing pinch point sidewalk widths at most locations except three: at McKesson Plaza (reduced from 26 feet to 11 feet), at a BART portal between Montgomery/New Montgomery and Second streets (reduced from 16 feet to 10 feet), and at a BART/Muni station portal between California/Drumm/Main and Spear streets (reduced from 13 feet to 9 feet). On the south side, existing sidewalk pinch points located next to BART station portals measure between 15 and 16 feet; the proposed project would not change these existing pinch point sidewalk widths.

The walking/accessibility impact analysis in Impact TR-5 includes a quantitative sidewalk level of service analysis of the proposed project's effect of the sidewalk narrowing at selected locations for the weekday p.m. peak hour (see Draft EIR pp. 4.B-74 and 4.B-75). The analysis was provided for informational purposes because pedestrian comfort impacts, by itself, is not a significant impact on the environment. However, the following response addresses sidewalk crowding as it relates to the accessibility component of the walking/accessibility significance criteria.

As discussed above, the proposed project generally seeks to remove obstacles for pedestrians by providing a dedicated pedestrian through-zone/access route that is clear of all vertical obstructions, reducing crosswalk distances, redesigning the two-stage crossings on the north side of Market Street, and providing dedicated and protected bicycle facilities to discourage bicyclists and people on scooters from riding on the sidewalk pedestrian through zone. The quantitative sidewalk level of service analysis was conducted of the amount of sidewalk space dedicated for pedestrian movement (i.e., the pedestrian through zone) for baseline plus project conditions for the weekday p.m. peak hour to determine the effect of the proposed sidewalk narrowing at nine representative locations within the Market Street project corridor (see Draft EIR pp. 4.B-74 and 4.B-75). The analysis was conducted at the pinch points of the representative locations and considers the "shy distance"[22] from buildings to account for doors and the fact that people do not generally walk closely to building walls.

The quantitative analysis found that with implementation of the proposed project, the density of people walking would increase from baseline conditions, however, the sidewalk width would remain adequate to accommodate people walking without resulting in substantial overcrowding (i.e., at LOS D or better, as noted in a comment). While more crowded conditions would result in slower walking speeds, they do not represent a barrier with respect to accessibility. Analysis of 2040 cumulative conditions was also conducted at the nine sidewalk study locations, and the results of this analysis are included in Draft EIR Appendix 7. Under

[22] The shy distance is the sidewalk area at the edge of the sidewalk close to the street or buildings that people walking tend to avoid.

2040 cumulative conditions, the volume of people walking during the weekday p.m. peak hour would increase by 20 to 22 percent at the study locations. Even with these increases in the number of people walking, the sidewalk level-of-service analysis for 2040 cumulative conditions, with implementation of the proposed project, found that, although the sidewalk would become more crowded, the sidewalk width would remain adequate and able to accommodate people walking without resulting in substantial overcrowding (i.e., at LOS D or better) or impacts related to accessibility for people walking.

With respect to café tables and chairs impeding the throughway, following implementation of the proposed project, restaurants and cafés requesting use of the adjacent sidewalk for tables and seating would be required to obtain a permit for this use, and any permits issued would need to be renewed on a periodic basis.[23] Public Works Code article 5.2 and Public Works Order 183,188 specify the requirements for restaurants and cafés to provide outdoor seating and specify the minimum dimensions for unobstructed pedestrian walkway adjacent to the seating, and applications of such permits are required to undergo agency review. With implementation of the proposed project, sidewalk seating would no longer be permitted at some locations along the Market Street project corridor due to the narrower sidewalk widths.

Comfort for People Walking Due to Crowding. A comment stated that people walking on Market Street need to be comfortably accommodated. As described above, the CEQA significance criteria for walking/accessibility states that a project would have a significant effect on the environment if it would create potentially hazardous conditions for people walking, or otherwise interfere with accessibility of people walking to and from the project site and adjoining areas. Comfort of people walking is not a CEQA issue and is therefore not addressed in the Draft EIR.

Safety for People Bicycling. Comments expressed concern about safety for people bicycling on Market Street and that the sidewalk-level bikeway would not improve safety for bicyclists at intersections. As described in Impact TR-6. the proposed project would improve bicycle safety by restricting private vehicle access on Market Street, establishing raised loading areas to reduce instances of loading vehicles blocking the bikeway, adding bicycle signals and additional bikeway signs and markings, and delineating the bikeway from the sidewalk. At intersections, the proposed bicycle signals, bike boxes, signs, and markings, as well as turning and private vehicle restrictions, would improve safety for bicyclists compared with existing conditions.

With respect to concerns raised about bicyclist safety at loading zones, the proposed project design would seek to minimize conflicts between loading vehicles and bicycle travel by providing sidewalk level loading zones outside of the bikeway. Loading zones would be at

[23] See Public Works Permit information for café tables and chairs at https://www.sfpublicworks.org/services/permits/cafe-tables-and-chairs.

sidewalk level, and therefore the bikeway would not "dip" to street level unlike what was stated in a comment. As discussed on Draft EIR p. 4.B-79, loading vehicles would cross the bicycle path of travel when accessing a raised loading zone, moving from roadway to sidewalk grade to access a loading space. The movement of loading vehicles would be similar to baseline conditions (i.e., vehicles must cross a class II bicycle lane to access parking or loading spaces). When parking the loading vehicle within the bay, the driver would need to position the loading vehicle to the far-right edge of the loading zone to avoid blocking the bikeway, and exercise care to avoid hitting bicyclists when opening doors and loading freight. The driver would need to exercise the same caution as the delivery vehicle crosses returns to the curb lane from the loading zone. Potential conflicts between loading vehicles and bicyclists traveling in the protected bikeway would be reduced by the proposed restrictions on commercial loading in the peak direction of each peak commute hour as well as incentives for smaller trucks and nighttime loading.

Battery Street Bridge Configuration. A comment raises concerns that a bicycle connection from Battery Street onto westbound Market Street would be removed with the proposed project, and recommends creation of a bicycle lane on the portion of Battery Street between Bush and Market streets proposed to be closed (i.e., the Battery Street bridge). A discussion of bicycle travel following the proposed closure of the segment of Battery Street between Bush and Market streets is presented on Draft EIR p. 4.B-78. With implementation of the proposed project, the Battery Street bridge would become a pedestrian plaza, however, bicyclists would also be permitted to traverse the new plaza to connect between the sidewalk-level bikeway on Market Street and Bush and Battery streets to the north. Therefore, changes to the proposed project to accommodate bicycle movement are not required.

COMMENT TR-5: LOADING IMPACTS

- I-Hestor-2
- I-Hestor-5
- I-Wright-2
- O-SFBC2-5

"The ways **deliveries are made** - particularly to places where people live, or hotels, or even places where people work. As thousands of housing units are built in this stretch of Market, new residents (particularly well paid residents) have evolved to constant deliveries of hundreds of packages (individual meals, groceries, deliveries of all types instead of venturing out to shop. And hauling back what they bought at the store. It is not unreasonable to multiply each unit by at least 10 - 15 deliveries per week - from Amazon, UPS, Fed Ex, meal delivery services, etc. times the number of units in each building. Where a building faces Market, those delivery

trucks (or bikes, or motorized robots), they will try to deliver to the Market St address of that person. People don't go out to restaurants or other places to eat. Deliveries, even from grocery stores." (*Sue C. Hestor, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hestor-2])*

"In instances where on Fig 2 - 1 proposed street direction changes are shown, there should be a grounding in the reality of how the changing street direction will impact buildings DIRECTLY on the reroute, and also adjacent streets. Making Ellis one - way west bound will eliminate all deliveries to the Flood Building which faces Powell (cable cars), Market (bus stops, deliveries virtually impossible even for truck) and Ellis. EVERYTHING coming into Flood Building - or new hotel across Ellis - will have to move east on O'Farrell, south on Stockton to get to Ellis. Then move west on Ellis. There is virtually no traffic on Powell because of cable car operations and vehicle bans. Alternative is to come north on 3rd St, turn left on Geary, south on Stockton, right on Ellis. There are a lot of hotels in this area. Even taxis will got up in this maze. Not to mention Uber, Lyft and private buses." (*Sue C. Hestor, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hestor-5])*

"Beer deliveries will be brought by hand carts from around the corner someplace – I don't know where they're going to stop to make deliveries. Of course, the inward-focused Twitter and Uber food courts will be fine, as they have corporate delivery bays off Market Street" (*David S. Wright, Attorney at Law, Individual, Email, April 1, 2019 [I-Wright-2])*

"The DEIR's study of the proposed loading zones' effect on safety throughout the project is also inadequate. According to the DEIR, peak-hour restrictions and incentives for smaller trucks would mitigate any hazard. While this outcome is possible, an incentive program for smaller delivery trucks has no precedent in San Francisco and may not reduce hazards faced by people biking. The recommendation of an incentive program comes from a literature review of loading best practices, but the program's effectiveness and ability to enhance safety in a meaningful way in San Francisco along Market Street has not been studied or verified. Further, funding for ongoing administration and enforcement of such programs may be a barrier to their implementation. Additional mitigation efforts such as enforcement and design elements should be further studied to ensure bicyclist safety in loading areas." *(Charles Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-5])*

RESPONSE TR-5

These comments raise concerns regarding the ability of the proposed project to accommodate the existing and proposed new commercial and passenger loading activities. One comment

raises concerns that the analysis of the proposed loading zones' operational effect on bicyclist safety is inadequate and recommends that additional mitigation measures such as enforcement and design elements be further studied. A comment raises concerns that for buildings without onsite passenger and commercial loading facilities (e.g., the Twitter and Uber buildings), the private vehicle access restrictions and perceived loading access restrictions would make passenger and commercial loading more difficult along Market Street (e.g., at the Hotel Whitcomb or the Fermentation Lab establishments), while another comment raises concerns that making Ellis Street one-way westbound would eliminate all deliveries to the Flood Building. Another comment describes the increasing reliance on deliveries by residents and raises concerns that as new residential units are built out along the Market Street project corridor, that for buildings with Market Street addresses, delivery trucks would access Market Street to make their deliveries.

This response provides information and clarification regarding proposed project impacts on commercial truck and passenger loading operations within the project corridor, presented in Impact TR-7 on Draft EIR pp. 4.B-83 to 4.B-90, which were determined to be less than significant. This analysis is supported by substantial evidence, and no additional analysis is required.

As described on Draft EIR pp. 4.B-83 to 4.B-85, the proposed project would remove existing commercial and/or passenger loading zones along the Market Street project corridor; however, it would replace them with new loading zones near or at the same location as existing facilities. If at the same location as existing facilities, the proposed project would redesign the new loading zones to accommodate the project's design (e.g., sidewalk-level bicycle facility). There are currently 23 loading bays on Market Street between Steuart Street and Octavia Boulevard, and the proposed project would provide 22 loading zones, with 20 of the 22 loading zones at the sidewalk level and in the furnishing zone of the sidewalk, separate from the bikeway and pedestrian throughway. Table 4.B-6, Existing Loading Bays and Proposed Loading Zones on Market Street, on Draft EIR p. 4.B-85, lists the location and length of the existing and proposed loading zones within the project corridor. As shown on Table 4.B-6, the existing passenger loading zone on the south side of Market Street between Eighth and Ninth streets would be lengthened from 80 to 100 feet, and would remain within the curbside travel lane, as under existing conditions. This zone would be limited to shuttle coaches actively loading or unloading passengers at the Hotel Whitcomb. On the north side of Market Street, between Eighth and Ninth streets, a new commercial loading zone (100 feet in length) would be installed, which would accommodate deliveries such as the beer deliveries to the Fermentation Lab bar.

While the proposed project would reconfigure existing loading facilities within the Market Street project corridor, and provide a similar number as under existing conditions, it would also provide 188 net-new commercial loading spaces and 23 net new passenger loading zones (accommodating 46 vehicles) on cross and side streets along the project corridor. Therefore,

although some passengers in private or TNC vehicles may need to walk farther to their destination on Market Street, on-street spaces on cross and side streets would accommodate the loading demand.

With implementation of the proposed project, Ellis Street between Cyril Magnin and Stockton streets would be converted from two-way to one-way westbound (note that Ellis Street is one-way westbound west of Cyril Magnin Street). Vehicular access to Ellis Street, and thus to the Flood Building, would be maintained. Vehicles would need to access Ellis Street in this segment from Stockton Street southbound due to the proposed change in travel direction. Stockton Street could be accessed from multiple streets including eastbound O'Farrell and Post streets, westbound Geary and Sutter streets, and from streets north of the Stockton Street tunnel. Therefore, contrary to the statement in the comment, the change in street direction on Ellis Street would not eliminate access for all deliveries to the Flood Building.

A comment discusses deliveries to land use development projects and the anticipated increase in development along the Market Street corridor. The statement in the comment that there are at least 10 to 15 deliveries per week per residential unit is not accompanied with evidence supporting this claim.

The proposed project is a transportation project and does not include any land use development, and therefore would not result in an increase in commercial loading demand. As described in Impact TR-8 on Draft EIR pp. 4.B-83 to 4.B-90, with implementation of the proposed project, the reconfigured loading facilities would accommodate the baseline loading demand associated with the pending development projects on Market Street in the vicinity of the existing and reconfigured loading zones. A discussion of cumulative loading conditions is presented in Impact C-TR-7 on Draft EIR pp. 4.B-104 to 4.B-108. As indicated in this discussion, due to the magnitude of potential future growth in residential and commercial development within the greater Market Street study area, particularly in the South of Market area, the inability to provide adequate supply of off-street commercial loading spaces for individual projects and the removal of large amounts of on-street commercial loading spaces would be considered a significant cumulative impact. The proposed project would not contribute considerably to this significant cumulative loading impact for the following reasons:

- The proposed project would not result in a substantial net change in the number of loading zones along Market Street, and this street would be able to accommodate a generally similar number of commercial vehicles loading/unloading.
- Implementation of the proposed project would increase the number of on-street commercial loading spaces on cross and side streets north and south of Market Street. The location of the proposed new on-street commercial loading spaces was based on a review of known cumulative projects and cumulative street network changes so that the

on-street commercial loading spaces implemented by the proposed project would not be eliminated as part of future projects.

- The proposed project would not result in an increase in commercial loading demand

Thus, the proposed project would not contribute considerably to these significant cumulative loading impacts, and therefore impacts of the proposed project would be less than significant.

Please refer to Response TR-4, Walking/Accessibility and Bicycle Impacts, for discussion of bicycle safety concerns at the proposed new loading zones.

For informational purposes, the planning department and the SFMTA typically examine the proposed commercial and passenger loading facilities of development projects along the Market Street corridor. An example of proposed or approved designs that were reviewed by the planning department and SFMTA is the 10 South Van Ness Project. The commercial and passenger loading zones for the 10 South Van Ness Avenue Project's commercial loading facilities are proposed to be within both onsite and on-street facilities and accessed from 12th Street. The 1500–1540 Market Street Project (i.e., One Oak) would provide onsite loading facilities, which would be accessed from Oak Street. On-street commercial and passenger loading activities for One Oak would also be accommodated on Oak Street, not on Market Street. The Hub Plan, which is within the vicinity of the project corridor, would require large development projects within the plan area to prepare a Driveway and Loading Operations Plan (DLOP) to reduce potential conflicts with people bicycling and walking as well as transit and other vehicles. The DLOP would require offsite loading activity to be considered in the design of new buildings. Applicable projects would prepare the DLOP in accordance with guidelines issued by the planning department. The DLOP would be reviewed and approved by the planning department, in consultation with the SFMTA. The DLOP is currently a planning code requirement (Planning Code section 155[u]) for development projects within the Central SoMa Plan area, which is south of the Better Market Street project corridor.

COMMENT TR-6: PARKING IMPACTS

- I-Strassner-6

"F) Unfortunately Planning continues to analyze parking demand and then thankfully appropriately concludes that parking demand is not an environmental impact in San Francisco. It is past time to stop counting parking in an EIR." (*Howard Strassner, Individual, Letter, April 5, 2019 [I-Strassner-6])*

RESPONSE TR-6

This comment states that the parking should not be included in the EIR.

This response provides information and clarification on the type of parking impact analysis that was conducted for the proposed project in the Draft EIR, which were determined to be less than significant. This assessment is supported by substantial evidence, and no additional analysis is required.

The Draft EIR does not analyze parking demand. The proposed project is an infrastructure/ transportation project. Therefore, the Draft EIR includes analysis to determine whether the project would result in a substantial parking deficit. The methodology for the parking impact analysis is presented on Draft EIR pp. 4.B-42 and 4.B-43, while the parking impact analysis is presented in Impact TR-8 on Draft EIR pp. 4.B-90 and 4.B-91 and C-TR-8 on pp. 4B-108 and 4.B-109. The proposed project would permanently remove the six existing on-street parking spaces on Market Street east of Spear Street and would convert 261 on-street parking spaces along the Market Street corridor on side and cross streets from general vehicular parking to commercial loading spaces and passenger loading/unloading zones. However, this would not result in a substantial loss in vehicular parking.

COMMENT TR-7: EMERGENCY ACCESS IMPACTS

- I-Anne-4

"I would like to know what provision has been made for emergency vehicle access to Market Street, particularly with regard to BART. I can't see how a fire engine is going to get down that mess if there is anything like standard bus rush hour traffic and a delivery vehicle blocking the outside lane." (*K. M. Anne, Individual, Email, March 13, 2019 [I-Anne-4])*

RESPONSE TR-7

The comment raises concerns about maintaining emergency vehicle access along Market Street after implementation of the proposed project.

The response provides information and clarification on the proposed project's emergency vehicles access impacts presented in Impact TR-9 on Draft EIR pp. 4.B-92 and 4.B-93, and which were determined to be less than significant. This assessment is supported by substantial evidence, and no additional analysis is required.

As indicated in the discussion in Impact TR-9, the proposed project would generally maintain two travel lanes in each direction within the Market Street project corridor, similar to existing conditions. In the segment of Market Street between 11th and Franklin streets, the number of travel lanes would be reduced from four under existing conditions to two lanes under the Western Variant. Private vehicle and turn restrictions would generally limit motor vehicle access on Market Street to public transit vehicles, emergency vehicles, taxis, paratransit vehicles

and bicycles. Under both the proposed project and Western Variant, emergency vehicles would be able to access properties, including BART stations, by also traveling within the Muni-only lanes, which would have fewer vehicles than the existing mixed-flow lanes. Therefore, both the proposed project and Western Variant would not preclude emergency access along Market Street, and, as noted above, impacts on emergency access would be less than significant.

COMMENT TR-8: WESTERN VARIANT

- O-SFBC2-4

"The DEIR notes that the Western Variant would "further enhance the bicycle network along Market Street", but it is unclear whether this statement refers to the baseline or the proposed project. Regardless, the safety potential of the Western Variant and associated private vehicle restrictions needs to be robustly studied relative to the proposed project." *(Charles Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-4])*

RESPONSE TR-8

The comment requests clarification of impacts of the Western Variant on bicycle conditions, and states that the safety potential and private vehicle restrictions that are part of the Western Variant need to be studied relative to the proposed project.

The response provides information and clarification on the impacts of the Western Variant on bicycle conditions are presented in Impact TR-6 on Draft EIR pp. 4.B-77 to 4.B-83, which were determined to be less than significant. This assessment is supported by substantial evidence, and no additional analysis is required.

As described on Draft EIR p. 2-78, the Western Variant seeks improvements beyond those of the proposed project related to pedestrian and bicycle safety, comfort, and mobility through additional reductions to conflicts between different modes of transportation on the segment of Market Street between Ninth Street and Octavia Boulevard, and states that the EIR fully and separately evaluates the proposed project and Western Variant. Impacts of both the proposed project and Western Variant are compared to the baseline conditions, however, where differences between the proposed project and the Western Variant exist, these conditions are noted.

The potential impacts of both the proposed project and the Western Variant related to potentially hazardous conditions for bicyclists and bicycle accessibility for are presented in Impact TR-6 on Draft EIR pp. 4.B-77 to 4.B-83. This assessment evaluates both the physical changes to Market Street bicycle conditions with respect to bicycle facilities and effect on bicycle travel and safety resulting from restrictions to private vehicle travel along the Market Street project corridor. Evaluation of bicycle conditions due to the additional improvements included

as part of the Western Variant on the segment of Market Street generally between Ninth Street and Octavia Boulevard are presented on Draft EIR pp. 4.B-82 and 4.B-83. Similar to the proposed project, the Western Variant would provide continuous 2.2 miles of protected bicycle facilities and supporting features that would enhance bicycle circulation and safety in both directions of travel on Market Street, and improve connectivity with other north-south bicycle facilities. Implementation of the proposed project would reduce the number of vehicles on the Market Street project corridor through private vehicle restrictions and turn restrictions, thereby reducing the potential for vehicle-bicycle conflicts. In addition, the Western Variant would reduce the number of westbound travel lanes between Hayes/Larkin/Ninth streets and 12th Street from two to one travel lane, and in the eastbound direction from 12th Street to 11th Street, from two to one travel lane. This would allow for a sidewalk-level bikeway facility in the eastbound direction between 12th and 11th streets, and in the westbound direction between 11th Street and Van Ness Avenue. The sidewalk-level bikeway would be separated from the adjacent vehicle lane by a raised curb and horizontal buffer and would be wider than the existing class II bike lane. No additional discussion or analysis related to bicycle impacts for the Western Variant is needed.

In response to the comment, the following clarification was made to Draft EIR p. 4.B-83 (deleted text is shown in ~~strikethrough~~ and new text is double underlined).

> For the above reasons, the Western Variant would further enhance the bicycle network along Market Street and reduce the potential for conflicts between bicyclists and turning vehicles in the western segment of Market Street between Octavia Boulevard and Ninth/Larkin/Hayes streets relative to the proposed project. Therefore, similar to the proposed project, impacts of the Western Variant on bicyclists would be ***less than significant.***

This change is also included in RTC Chapter 5, *Draft EIR Revisions*. The revision does not change the analysis or conclusions presented in the EIR.

COMMENT TR-9: ENFORCEMENT OF PRIVATE VEHICLE AND TRANSPORTATION NETWORK COMPANY RESTRICTIONS

- I-Hestor-3
- I-Hestor-6
- I-Hestor-8
- I-Pearce-2
- O-WSF1-3

"**Uber and Lyft THINK they are taxis**. With untrained drivers who may not live, be familiar with, OR CARE ABOUT, restrictions on movement, turns prohibited, or lanes they may not

drive in. The City has not been able, or cared to enforce the rules. Licensed taxi drivers are EXPECTED to know the rules and the City has enforcement powers through their LICENSES. Instead of motto of move fast and break things." (*Sue C. Hestor, Attorney at Law, Letter, April 15, 2019 [I-Hestor-3])*

"Page 2-5 - maneuvering of vehicles on street. Unstated is the problem that because of non - enforcement of traffic rules, private Uber and Lyft drivers often just make illegal U-turns, in the middle of Market Street, wherever, so the hazards faced by pedestrians are multiplied. 5th and Market has been particularly challenging because of re - routing of 30 - Stockton and other south - bound busses onto Market, then south on Fifth.

Project Background

Missing task – if state legislation needed, this should be high-priority mitigation measures.

All vehicles carrying passengers for hire, or hired to provide private busses for their workforce, should be required to turn on "vehicle locators" while they are on San Francisco. AND send that information to CITY TRACKING SYSTEM. The MUNI tracks location of buses for NEXT BUS ability. Private buses (to/from Silicon Valley), ones operated by entities such as UCSF, Lyft, Uber, all have ability to track/locate their vehicles. It could enable REAL-TIME information on traffic jams. Provide information THAT CAN BE TRANSMITTED in REAL-TIME to people with ability to write tickets to violators. This should include (illegal) double-parking in middle of street for passenger pickup and drop-off. Which slows down MUNI buses.

Also, if there is any problem with SAN FRANCISCO having the legal ability to restrict "taxi" lanes to SF licensed taxis and not private vehicles operated by Uber and Lyft, this should also be priority for state legislation.

Term "necessary motor vehicle traffic" on 2-6 is meaningless unless SF has legal ability to define what vehicles can operate in what lanes." (*Sue C. Hestor, Attorney at Law, Letter, April 15, 2019 [I-Hestor-6])*

"Page 2-46 – Private Vehicle Access, the statement in first paragraph that Uber and Lyft are considered private vehicles and thus restricted from using Market Street, is the first time I saw it so plainly stated in their DEIR. Unless that restriction it is ENFORCED it is meaningless. Waiting at a MUNI stop on Market and seeing "transportation network company vehicle" after vehicle come to the curb to drop off or pick up passengers, while the MUNI struggles to get down Market, makes that statement meaningless. With ZERO or almost zero enforcement, Uber and Lyft drivers will make all improvements for speedier MUNI and public transit meaningless." (*Sue C. Hestor, Attorney at Law, Letter, April 15, 2019 [I-Hestor-8])*

"I would like to hear about how the city plans to manage cross traffic blocking Market St as it is already an issue, and only going to get worse with all these re-routes." (*Mike Pearce, Individual, Email, March 12, 2019 [I-Pearce-2]*

"We do think, though, enforcement is needed to make this the maximum effect possible." *(Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-3)*

RESPONSE TR-9

These comments raise concerns regarding enforcement of traffic regulations, including restrictions to private vehicle and transportation network company vehicle access along the Market Street project corridor, the need for a mitigation measure to facilitate enforcement of proposed private vehicle access and turn restrictions, and concerns regarding the effects of private vehicle and turn restrictions on traffic crossing Market Street.

This response provides information regarding enforcement of traffic regulations as it pertains to the operation of private vehicles on Market Street, including transportation network company vehicles. In addition, this response presents information and clarification regarding the transit travel time analysis contained in the Draft EIR related to effects of traffic crossing Market Street as a result of the proposed vehicle restrictions along the Market Street project corridor. The transit travel time analysis is supported by substantial evidence, and no additional analysis or mitigation measures are required.

Concerns regarding lack of enforcement of traffic regulations, in particular transportation network company vehicles, are noted. As described on Draft EIR p. 2-50, the proposed project would include signage and traffic striping to reinforce the turn restrictions and provide clear demarcation for various travel modes: vehicles, transit, bicycles, loading, and parking. In addition, the proposed project would include installation of additional closed-circuit television (CCTV) cameras at intersections along the project corridor that would be connected to the SFMTA's Transportation Management Center (TMC). These cameras would allow TMC personnel to monitor traffic conditions and to dispatch traffic enforcement officers to locations as needed, such as when there are collisions, vehicle queues extending into an intersection, or other unplanned events. However, the proposed project would not change existing procedures for enforcement of traffic laws in San Francisco, including turn restrictions and proposed restrictions to remove private vehicles (except trucks loading/unloading, and paratransit and emergency vehicles) along the Market Street project corridor. Enforcement would be consistent with current procedures for monitoring and citing moving violations.

The SFMTA would develop a plan for increased education and enforcement for the public during the first few months following implementation of the proposed project's vehicle restrictions, turn restrictions, and parking and loading changes. In the past, implementation of larger-scale traffic and parking changes has included deployment of Parking Control Officers (PCOs) to a project area from 7 a.m. to 7 p.m., followed by an assessment of outcomes. Pending results, PCOs would be deployed during the a.m. and p.m. peak periods, followed by another assessment of outcomes. Pending those results, the SFMTA would move onto more sporadic deployment of PCOs. In the past, the SFMTA has also requested that the San Francisco Police Department increase its presence in project areas during initial project implementation to provide support for the PCOs. The SFMTA also works with global positioning system (GPS) providers to update their routing and account for vehicle and turn restrictions.

Following initial enforcement efforts, traffic and parking changes are enforced through SFMTA's standard enforcement procedures. Currently, PCOs are deployed to the intersections of First Street/Market Street and Montgomery Street/New Montgomery Street/Market Street every weekday during the peak period to direct traffic. PCOs are also deployed as needed, which, on average, is twice a week, at two intersections along Market Street from 3 p.m. to 6 p.m. weekdays to enforce traffic restrictions. With respect to parking enforcement, there is currently one dedicated PCO along Market Street between Ninth and Steuart streets who is responsible for issuing citations to people who park illegally within commercial loading bays. The San Francisco Police Department also provides routine enforcement crackdowns. Furthermore, the SFMTA has worked with app-based ride-hailing services, such as Uber and Lyft, to create geofencing[24] and enforce vehicle restrictions. In addition, all Muni buses are equipped with forward-facing cameras, and vehicles parking within the bus right-of-way (e.g., bus stop or transit-only lane) could be ticketed. The SFMTA is working with state authorities to pursue state legislation that will enable it to ticket moving vehicles within Muni facilities. These existing and potential changes to use of cameras on Muni buses to cite vehicles would further facilitate enforcement of the proposed Muni-only lanes and vehicle restrictions along the Market Street project corridor. The comment regarding changes to state legislation is not under the purview of the City or this CEQA document.

With respect to vehicles crossing Market Street, the proposed project would continue to allow private vehicles to cross Market Street northbound and southbound at all intersections along the project corridor where vehicles can currently cross Market Street (see Figure 2-5, Existing

[24] Geofencing refers to the use of global positioning systems (GPS) or radio frequency identification devices (RFID) to create a virtual geographic boundary, enabling software to trigger a response (e.g., text message, email alert, or app notification) when a mobile device enters or leaves a particular area. This information can be used by app-based ride-hailing services to redirect or restrict drivers from a certain area.

and Proposed Vehicle Circulation, on Draft EIR p. 2-45).[25] However, vehicles would no longer be able to turn onto Market Street to use it to travel from one southbound street to another (e.g., from southbound Montgomery Street onto eastbound Market Street and continuing southbound on First Street), which would result in drivers shifting to alternate routes north or south of Market Street to reach their end destinations. As described on Draft EIR p. 4.B-59, vehicle queues crossing Market Street would not change substantially at most locations despite these restrictions because the proposed project is not a land use project and would therefore not generate additional trips nor change the total number of people traveling through the transportation study area, and any increase in vehicles on one street crossing Market Street would generally have a corresponding decrease in vehicles on another street. One location where congestion and vehicle queues would increase with implementation of the proposed project would be at the intersection of Market Street with Cyril Magnin and Fifth streets. As noted on Draft EIR p. 4.B-58, the closure of eastbound Ellis Street at Market Street would result in additional vehicles crossing Market Street at Fifth Street. As discussed on Draft EIR pp. 4.B-100 and 4.B-101, this would result in the proposed project contributing to a significant and unavoidable cumulative transit delay impact on the Muni 27 Bryant bus route.

As noted above, vehicle queues crossing Market Street would not substantially change compared to existing conditions at most locations. The proposed project would include elements that would address existing problem locations, including updated signal timing to manage vehicle queues. The transit travel time analysis accounts for changes in vehicle traffic due to the proposed project, including at locations where vehicles currently crossing Market Street do not fully cross during the signal cycle under existing conditions. Therefore, the transit impact analysis accounts for potential impacts on Market Street and cross streets where vehicle queues block transit vehicles.

The SFMTA currently monitors the traffic flow crossing Market Street on an ongoing basis and currently assigns parking control officers to Market Street intersections (e.g., parking control officers posted on Market Street at First Street and at New Montgomery Street) during the peak hours when queuing occurs. If queuing were to continue to occur with implementation of the proposed project, the SFMTA would continue to assign parking control officers to Market Street intersections as needed.

The intersection operations analysis used in estimating transit travel times accounted for the physical characteristics of intersections (e.g., travel lanes, traffic signals, turn restrictions) and

[25] As under existing conditions, with implementation of the proposed project vehicles would be able to cross Market Street at the following intersections with Market Street: at Gough Street, at Van Ness/South Van Ness avenues, at Tenth/Fell/Polk streets, at Ninth/Larkin/Hayes streets, at Eighth/Hyde/Grove streets, at Seventh Street/Charles J. Brenham Place/McAllister Street, at Sixth Street/Taylor Street/Golden Gate Avenue, at Fifth/Cyril Magnin streets, at Fourth/Stockton streets, at Third/Kearny/Geary streets, at Montgomery/New Montgomery/Post streets, at First/Bush/Battery streets, at Fremont/Front streets, at Davis/Beale streets, and at Main/Drumm streets.

the effects of vehicles blocking Market Street due to vehicle queues extending from adjacent intersections north and south of Market Street.. The transportation analysis assumed that drivers would comply with the California Vehicle Code and observe all posted signs within the project corridor.[26] As documented in Impact TR-3 (Draft EIR pp. 4.B-54 to 4.B-61) and Impact TR-4 (Draft EIR pp. 4.B-61 to 4.B-68), the proposed project's traffic hazards and transit impacts were determined to be less than significant, and therefore, mitigation measures such as those suggested in the comment to track transportation network company vehicles in real time, are not required.

D. CULTURAL RESOURCES

The comment and corresponding response in this section cover topics in Section 4.A, *Cultural Resources*, of the Draft EIR. The comments are grouped according to the following issue:

- CR-1: Historic Resources CEQA Findings

COMMENT CR-1: HISTORIC RESOURCES CEQA FINDINGS

- A-HPC-1
- A-SFPC-4
- I-Haas-4

"On March 20, 2019, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Better Market Street Project (2014.0012E). After discussion, which the transcript of the discussion is attached to this letter for informational purposes, the HPC arrived at the comments below:

- The HPC agreed that the analysis of historic resources and the range of alternatives studied in the DEIR was adequate. The HPC acknowledged that that the Full Preservation is almost a No Project alternative, but the alternatives address preservation goals. Commissioner Hyland noted that the proposed modifications to the Path of Gold would be reviewed by the HPC during the Certificate of Appropriateness process, so comment would be limited to the DEIR. The HPC had no specific comments regarding the analysis of the proposed modifications to Path of Gold in the DEIR." (*Aaron Hyland, President, Historic Preservation Commission, San Francisco Planning Department, April 2, 2019 {A-HPC-1])*

[26] The California Vehicle Code (CVC) dictates the rules that drivers have to follow on the road. The CVC contains instructions that must be followed by motor vehicle drivers and bicyclists.

"I would agree with Mr. Haas. I personally would like to see a brief recap of the history of Market Street in visual and narrative form. There is reference to Lawrence Halprin with the importance of this plan. There is no image or anything which speaks even about the design ideas, but which he transformed Market Street in 1976 at the time when it was opened. I thumb the book back and forth, and I always ask this. I like to see additional visual material really anchoring this project to what it is, the civic access and the role is going to be civic engaging throughout 1800 whatever to today.

I think we can pat ourselves a little bit on the shoulder, but also give anybody who wants to comment on the EIR sufficient background to really get the Ts into -- not just commenting on transportation and islands, et cetera." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript*, *April 4*, *2019 [A-SFPC-4])*

"The second thing I wanted to mention is that the in the historic section, it notes the major figures who were involved in the Market Street development program, but it doesn't at all talk about the politics or the issues that were raised by those projects. And in my book, which I gave you the flyer for which will be out on May 15th, in 1970 and '71, a number of people criticized those, including Ernest Born, the well-known architect who was head of the…. The famous sculpture Ruth Asawa, who called for the work of the fountain and the other work at UN Plaza brutal. A stark thing has no relationship to anything. You have to design places in the city for people to sit in the grass. And so if we're going to do a – highlight historic part of that in the area, we need to include the true story, so the consultants need to go and read the minutes of the art commission and include all that in the material." (*Jim Hass, Individual, Better Market Street working group, Draft EIR Hearing Transcript*, *April 4*, *2019 [I-Haas-4])*

RESPONSE CR-1

The first comment is from a summary of the Historic Preservation Commission's March 20, 2019 discussion following its March 20, 2019 public hearing on the proposed project. This comment notes that the HPC agreed that the Draft EIR's historic resources analysis and range of alternatives were adequate. The HPC also noted that the proposed modifications to the Path of Gold light standards would require a Certificate of Appropriateness from the HPC. The remaining comments suggest that a more detailed history of Market Street be included in the EIR, in both visual and narrative format, and that it include a discussion of the politics and other issues raised by the Market Street Redevelopment Plan.

The comments indicating the HPC's assessment of the Draft EIR's range of preservation alternatives are noted. An additional response to other comments from the HPC pertaining to

the range of alternatives considered in the Draft EIR can be found in the response to AL-1, Alternatives Considered in the Draft EIR.

The project sponsor is aware of the need to return to the HPC for a certificate of appropriateness regarding the Path of Gold. These comments do not require any changes to the Draft EIR.

The Draft EIR summarized a Cultural Landscape Evaluation (CLE) prepared for the proposed project. The CLE provides a detailed narrative and visual history of Market Street, including the Market Street Redevelopment Plan. Comments concerning the politics of the Market Street Redevelopment Plan are not necessary to establish Market Street's historic significance.

The following discussion provides references to the CLE prepared for the proposed project, with some additional details.

The CLE report, included as Draft EIR Appendix 6-3, was prepared by ICF in 2016. This illustrated technical report was prepared to evaluate Market Street as a cultural landscape and determine whether it qualifies as an historical resource under CEQA or as an historic property under the National Historic Preservation Act (NHPA). The CLE includes a chronological history, comparative contexts, historical themes relevant to Market Street, and an evaluation of Market Street's eligibility under the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) significance criteria. Following guidance from the National Park Service and best practices in cultural resource technical reports, the historic context section provides information about the "patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear."[27]

The historic context sections of the CLE provide an overview of the chronological history and development of Market Street over time, and summarize the major themes associated with Market Street's significance related to design, events, cultural history and more. The Market Street Redevelopment context section of the CLE provides information about the political and social factors that led to the development of the Market Street Redevelopment Plan, but does not include an extensive history of the politics or the issues raised by the plan. Although these historic context themes are interesting in their own right, they do not provide information necessary to understand the significance of Market Street under NRHP/CRHR Criteria A/1 and C/3 (the applicable criteria by which the historical resource was evaluated), and therefore, they have not been included in the CLE. These comments do not mention anything in the Draft EIR that is inconsistent with the CLE. Furthermore, these comments do not raise any specific environmental issues or questions regarding the adequacy or accuracy of the Draft EIR's analysis. As a result, no changes to the Draft EIR are required in response to these comments.

[27] U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* revised 1995: 7, https://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf.

In the CLE, the historic chronology includes the following periods, as illustrated with historical maps and other images (sample images are included after this summary for informational purposes):

- Spanish and Mexican Periods
- The Gold Rush and Early Urban Development, 1847–1860 (Image 1)
- Intensive Nineteenth-Century Urbanization, 1860–1906 (Images 2 and 3)
- Market Street at the Turn of the Twentieth Century (Image 4)
- The 1906 Disaster and Aftermath (Image 5)
- Market Street Reconstruction, 1906–1920 (Image 6)
- Market Street from Boom, to Bust, to World War II, 1920–1945 (Images 7 and 8)
- Decline and Redevelopment, 1945–1985 (Images 9–16)
    - Post-–World War II Decline of San Francisco
    - Modern and Postmodern Redevelopment
        - Early Transportation Redevelopment
        - Downtown Office and Residential Redevelopment
        - Market Street Redevelopment
        - Market Street Streetscape
    - Redevelopment of the Market Street "Transit Thoroughfare"
- Public Engagement on Market Street from Postwar to Postmodern

Comparative contexts were developed from the narrative chronological history in order to place Market Street within a larger historical framework. Each of the following context statements includes a definition of the geographic scale of the theme, a range of years that defines the context's period of significance, and a narrative description of the historical trend:

- Labor Movement, 1865–1902
- Women's Suffrage Movement, 1840–1920
- Modern Civil Rights Movement, 1954–1964
- Gay Liberation, Pride Celebration, and LGBTQ Political Protest, 1960–1995
- Protesting War and Celebrating Peace: World War I, World War II, Cold War, and Vietnam
    - World War I Protests and Celebrations, 1914–1918
    - World War II Protests and Celebrations, 1930–1945

  - Cold War and Vietnam War Protests, 1954–1975
- Urban Renewal and Revitalization through Landscape Design and Urban Planning in the United States and San Francisco, 1945–1980
- Market Street Redevelopment Plan: A Collaboration of Modern Design Masters
  - Mario Joseph Ciampi (1907–2006)
  - Lawrence Halprin (1916–2009)

The findings of the CLE determined that Market Street is an eligible historic property under the NRHP criteria and a historical resource under the CRHR criteria. These determinations were summarized in Section 4.A, *Cultural Resources*, of the Draft EIR.

An analysis of the history and trends related to the development of Market Street, in combination with an evaluation of its existing conditions, resulted in the finding that Market Street is an eligible historical resource. The following summarizes the NRHP/CRHR significance of Market Street, as outlined in the CLE and summarized in Section 4.A in the Draft EIR:

NATIONAL REGISTER OF HISTORIC PLACES/CALIFORNIA REGISTER OF HISTORIC RESOURCES EVALUATION:

THEME 1

Market Street appears to be nationally significant under NRHP Criterion A (events) and CRHR Criterion 1 (events) for its historic role as San Francisco's main circulation artery and facilitator of urban development, based on its association with the early urban and economic growth of San Francisco. As San Francisco's main circulatory artery, Market Street provided the physical foundation and transportation infrastructure mechanism that facilitated the city's development. Jasper O'Farrell's linear plan for Market Street, which formed an east–west axis joining the waterfront with the interior, helped spur early urban development from 1847–1860. Improvements to street paving, municipal infrastructure, and the introduction of multi-modal transportation prompted private investment along the corridor during a period of increasing urbanization from 1860–1906. Market Street provided the space needed to facilitate rapid reconstruction after the 1906 earthquake and fire. From 1906–1929, it was the venue where new progressive-era public urban infrastructure was most aggressively introduced and new private investment in the development of landmark-quality buildings was made.

Period of Significance: The period of significance is 1847–1929.

THEME 2

Market Street also appears to be nationally significant under NRHP Criterion A (events) and CRHR Criterion 1 (events) for its historic role as venue for civic engagement in San Francisco, based on its association with public demonstrations that elevated LGBTQ issues to national

attention, beginning in the 1960s and continuing through 1979. It is also locally significant for its association with public civic events and demonstrations that elevated civic discourse about other important themes related to civil rights. The route from Justin Herman Plaza to Market Street, as well as United Nations Plaza to city hall, was used as a ceremonial and processional route through the city for protest marches, community celebrations, and civic parades. Historically notable protests and celebrations that used Market Street as a venue for public engagement related to LGBTQ issues included the Gay Freedom Day Parade (later known as Pride Parade), with a procession along Market Street beginning in 1977, and the White Night Riot on May 21, 1979. In this role as a venue for large public civic events, such as political rallies, civic ceremonies, and public speeches, Market Street is also significant at the local level for its association with social history themes, including the labor rights and civil rights movements, war protest and peace celebrations, and women's suffrage.

Period of Significance: The period of significance is 1870s–1979.

THEME 3

Market Street appears significant at the national level under NRHP Criterion C (design) and CRHR Criterion 3 (design) for its association with the work of master architects John Carl Warnecke and Mario J. Ciampi as well as master landscape architect Lawrence Halprin. As a collaboration of these designers, the Market Street Redevelopment Plan is significant for its early application of an interdisciplinary approach to urban design, which helped elevate the influence of landscape architecture as a discipline that provides perspective on modern urban planning.

Period of Significance: The period of significance is 1979.



Image 1. Jasper O'Farrell's 1847 plan, illustrating Market Street's diagonal alignment, joining San Francisco's northern and southern grids. (San Francisco History Center, San Francisco Public Library)



Image 2. The character of Market Street changed dramatically in 1860 when the Hayes's Market Street Railroad Company completed construction of a steam-powered railway west of Montgomery Street. This image shows Market Street in 1865, view east toward San Francisco Bay. It shows the roadway before the introduction of railway transit east of Montgomery Street. (San Francisco History Center, San Francisco Public Library)



Image 3. Market Street, 1905, view west from the Ferry Building showing cable car routes down Market Street. (San Francisco History Center, San Francisco Public Library)

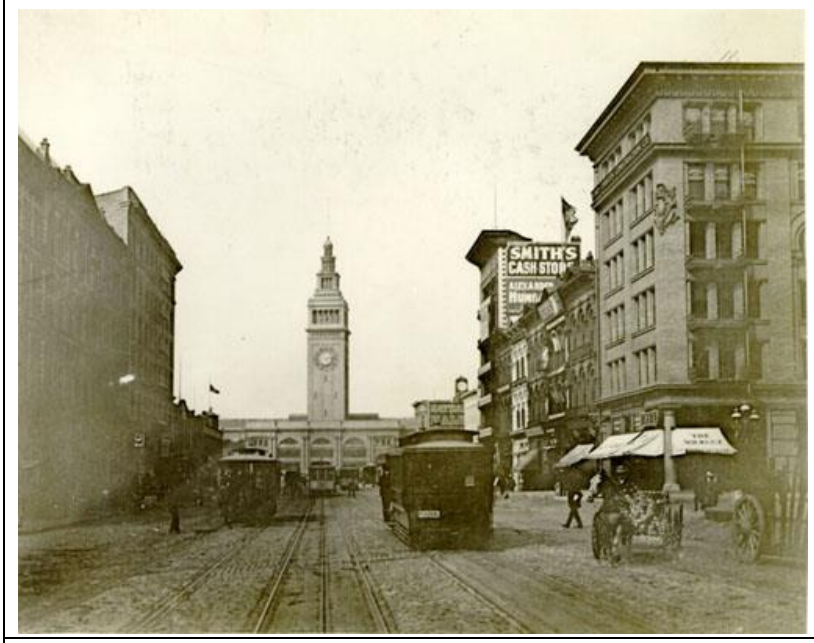


Image 4. Market Street, with view of the Ferry Building in 1906, showing the condition of the streetscape prior to the earthquake. (San Francisco History Center, San Francisco Public Library)



Image 5. Market Street, 1906, showing post-earthquake view of ruined buildings and extensive devastation. (San Francisco History Center, San Francisco Public Library)



Image 6. Market Street, 1911, showing how multi-modal transportation in the form of electrified streetcars and automobiles integrated with pedestrian traffic. This image also shows Lotta's Fountain at the corner of Market Street (foreground) and Kearny Streets (background). (San Francisco History Center, San Francisco Public Library)



Image 7. Market Street at Battery Street, 1934, showing four lines of electrified streetcars in the roadway. (San Francisco History Center, San Francisco Public Library)

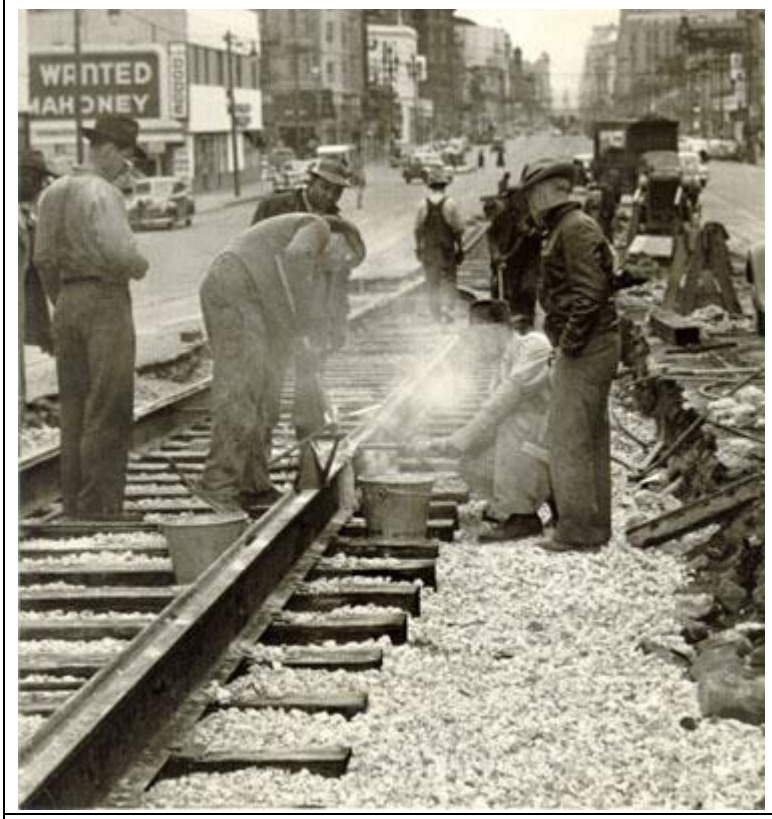


Image 8. Market Street, 1945, showing construction crews laying new track. (San Francisco History Center, San Francisco Public Library)



Image 9. Market Street, 1956, showing busy thoroughfare, including active sidewalks lined with Path of Gold light standards. (San Francisco History Center, San Francisco Public Library)



Image 10. Market Street, 1958, east view toward the Ferry Building, showing placement of Embarcadero Freeway. (San Francisco History Center, San Francisco Public Library)

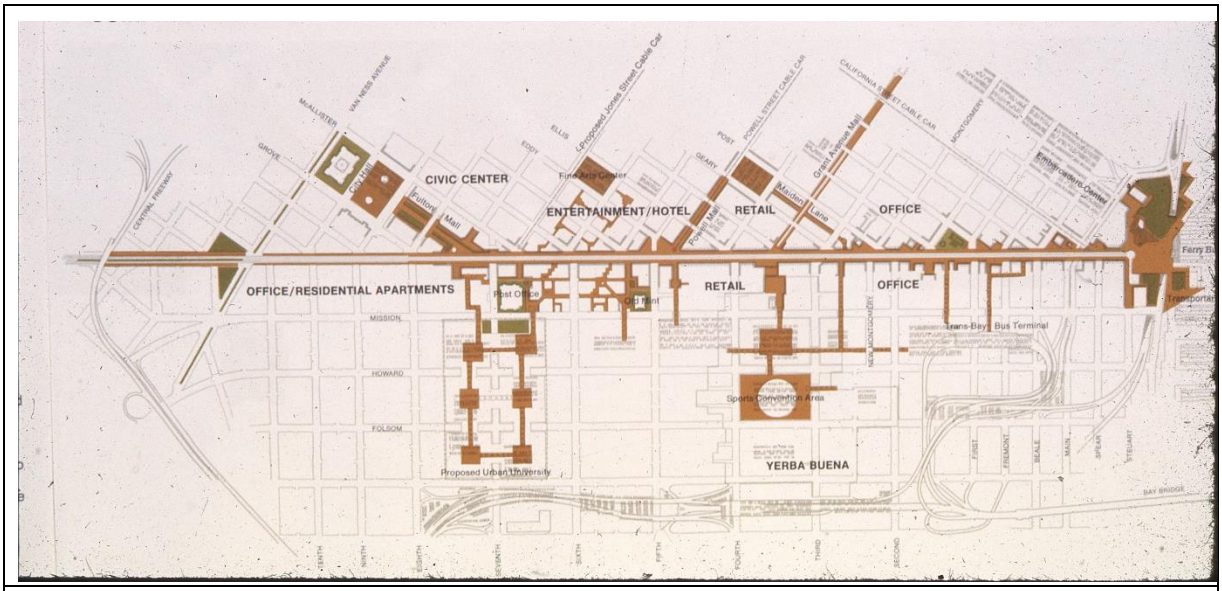


Image 11. Although the full extent of the pedestrian network envisioned in the Comprehensive Sketch Plan diagram (above) was not realized, as presented in the 1967 Market Street Design Plan, many of the plazas immediately adjacent to Market Street were retained as part of the implemented design. (Reproduced, copyright Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania*)*



Image 12. Market Street corridor, 1979, showing street furnishings clustered in the corridor, placed in the sidewalk space between the roadway and buildings. Furnishings included items such as phone booths (foreground), along with trash receptacles and bus shelters (background). (Photograph of slide sheet [cropped] by author. Slide E223, by Joshua Friedwald, dated 1979 [014.VI.5I.702-720], Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania)



Image 13. The California Statehood Monument was retained as part of the Market Street Redevelopment Plan. (Photograph contact sheet [cropped] by author. Sheet 1479R14-11, Joshua Friedwald, dated 1979 [014.IV.A.90], Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania)



Image 14. Lotta's Fountain at Kearny and Market streets was moved a short distance to accommodate Market Street Redevelopment Plan. (Photograph contact sheet [cropped)] by author. Sheet 1479R32-3, Joshua Friedwald, dated 1979 [014.IV.A.90], Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania)



Image 15. Street-level BART entrances featured a minimalist design that was varied in terms of detail. This image shows an example of the design for a bronze railing. (Photograph contact sheet [cropped] by author. Sheet 1479R22-9, Joshua Friedwald, dated 1979 [014.IV.A.90], Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania)



Image 16. BART entrances on Market Street, with brick interior finish. (Photograph contact sheet [cropped] by author. Sheet 1479R5-10, Joshua Friedwald, dated 1979 [014.IV.A.90], Lawrence Halprin Collection, The Architectural Archives, University of Pennsylvania)

E. AIR QUALITY

The comments and corresponding responses in this section cover topics in Section 4.D, *Air Quality*, of the Draft EIR. The comments are grouped according to the following issues:

- AQ-1: Policy and Plan Consistency
- AQ-2: Air Quality Emissions

COMMENT AQ-1: POLICY AND PLAN CONSISTENCY

- O-CRP-2

"This massive infrastructure project could act to significantly reduce demand for energy making the move to 100% Renewables for downtown businesses and residences more affordable. https://www.cleanpowersf.org/supergreen. Additionally, the BMS could directly improve public health through cooler streets and sidewalks and better air quality for the sensitive populations resident to plan areas (see Tenderloin Mid-Market Data Portal http://www.cmtldata.org/). According to Cal EPA Enviroscreen 3.0

(http://oehha.maps.arcgis.com/apps/View/index.html?appid=c3e4e4e1d1154683 90cf61d9db83efc4), BMS Phase 1 extends through the hottest blocks of San Francisco.

We therefore recommend that The City & County of San Francisco assure that BMS is aligned with CA SB 535 and AB1550, SF Environment's Renewable Energy Plan Goals (https://sfenvironment.org/energy/renewable-energy) and CAL FIRE and Urban Forestry Strategic Plan (http://calfire.ca.gov/resource_mgt/downloads/CA_UrbanForestPlan_20140109)_ FINAL.pdf)." *(Kasey Asberry, Climate Reality Project: SF Action Group, Letter, April 14, 2019 [O-CRP-2])*

RESPONSE AQ-1

The comment recommends that the proposed project be aligned with Senate Bill 535, Assembly Bill, 1550, SF Environment's Renewable Energy Plan, and CAL FIRE Urban and Community Forestry Program Strategic Plan.

As substantiated below, Senate Bill 535 and Assembly Bill 1550 are not applicable to the proposed project because the project would not receive any funding that would be administered through these laws. The proposed project is consistent with San Francisco's Renewable Energy Plan and the CAL FIRE Urban and Community Forestry Program Strategic Plan. This comment does not require any changes to the Draft EIR.

As discussed in Draft EIR Section 4.D, *Air Quality*, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and would not result in significant air quality or health risk impacts during construction or operation. As discussed on Draft EIR p. 4.D-38, construction on any one block of the project corridor would occur over approximately 1 year, which is far shorter than the exposure duration of 30 years that is typically associated with chronic cancer risk. Compliance with the Clean Construction Ordinance and Mitigation Measure M-AQ-1 would further reduce the magnitude of the project's contribution to local health risks during construction. In addition, health risks were modeled to determine the greatest anticipated increase in health risk because of project implementation (e.g., redistribution of traffic). The health risk assessment determined that the proposed project would not generate cancer risk or PM2.5 concentrations above thresholds of significance during operations.

As discussed in the proposed project's 2016 initial study and included as Draft EIR Appendix 2, the proposed project would not increase impervious surfaces relative to existing conditions and, therefore, would not contribute to any existing urban heat island effects. Paving materials would be sourced from Public Work's approved list and would be subject to regulations such as the Environmentally Preferable Purchasing Ordinance, which aims to reduce the environmental impacts of material purchases. Healthy street trees along the project corridor would provide shade, helping to lower ambient temperatures and reduce the urban heat island effect.

Senate Bill 535 and Assembly Bill 1550 requests that 25 percent of the proceeds from California's Greenhouse Gas (GHG) Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave the California Environmental Protection Agency responsibility for identifying impacted communities. The proposed project would not be funded by the state's GHG Reduction Fund and is therefore, not subject to the fund's administrative requirements.

As discussed in the 2016 initial study and included as Draft EIR Appendix 2, the proposed project would not encourage activities that would result in the use of large amounts of fuel, water, or energy. Furthermore, it would not use such resources in a wasteful manner. Project features would tie into the existing electricity grid and electricity would be provided by the San Francisco Public Utilities Commission (SFPUC), which is required to meet the state's Renewables Portfolio Standard (RPS). San Francisco's Renewable Energy Plan also stipulates a goal of having 100 percent of San Francisco's electricity demand met with renewable energy. The minor amount of electricity consumed by new streetlights and traffic signals operated by the project would not conflict with SFPUC's RPS compliance or San Francisco's Renewable Energy Plan.

The proposed project would not conflict with the goals and objectives of the CAL FIRE Urban and Community Forestry Program Strategic Plan, which include improving and managing the health of urban and community forests, as well as optimizing their community benefits.

Existing street trees along the project corridor have experienced an approximately 60 percent mortality rate. The proposed project would remove all existing street trees and install new street trees in the sidewalk areas paralleling the roadway. Replacement trees would be screened for use in the Market Street environment by the Public Works Bureau of Urban Forestry, in cooperation with the Urban Forestry Council, Friends of the Urban Forest, SF Environment, and local arboricultural experts.

This comment does not raise any specific environmental issues or questions regarding the adequacy or accuracy of the Draft EIR's analysis. As a result, no changes to the Draft EIR are required in response to this comment.

COMMENT AQ-2: AIR QUALITY EMISSIONS

- I-Katz-9
- I-Natvig-3

"Market St. would still be a forbidding place to bicycle because of extensive diesel bus and truck traffic (meaning poor local air quality);" (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-9])*

"These impacts would in turn reduce patronage and revenue, increase unnecessary stops, wear and tear on equipment, power and fuel consumption and collision damage to equipment. These factors together would consequently increase the use of motor vehicles, further increasing air pollution" (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-3])*

RESPONSE AQ-2

The first comment states that poor local air quality from diesel bus and truck traffic on Market Street would continue to make bicycling difficult, and the second comment states that the increased use of motor vehicles resulting from transit delays would further increase air pollution.

As discussed in Draft EIR Section 4.D, *Air Quality*, the proposed project would not expose individuals, such as bicyclists, in the project area (e.g., Market Street) to substantial pollutant concentrations and would not result in significant air quality or health risk impacts during operation. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR.

Operation of the proposed project could result in changes in travel patterns and vehicle distribution along Market Street and nearby streets. Although these changes to the transportation network would occur, the proposed project would not induce or generate new

vehicle trips in the project area that would result in a substantial increase in VMT or vehicle fleet mix (e.g., diesel traffic), thereby increasing pollutant emissions or degrading air quality. In addition, the proposed project would restrict private vehicles in the project corridor, resulting in a decrease in vehicle volumes on Market Street which would result in a reduced pollutants emissions and associated health risks, and improve air quality for individuals (including bicyclists) along Market Street from vehicle travel relative to no-project conditions.

The proposed project would relocate and create several new loading zones along Market Street where diesel vehicles could potentially idle and increase ambient PM2.5 and diesel particulate matter concentrations. However, all new loading zones on Market Street would replace existing bays at the same location or directly adjacent to the proposed location. The existing loading bays are used primarily (67 percent) by commercial vehicles, which are predominantly diesel-fueled vehicles, whereas the new loading zones would support active paratransit, taxi, and commercial vehicles. Although some paratransit vehicles and taxis may be diesel fueled, the majority use gasoline. The penetration of alternative fuels, including electricity, is also expected to increase in the future, further reducing localized idling emissions. Accordingly, air quality health risks associated with the new multi-use loading zones within the project corridor would be lower than the air quality health risks associated with the existing adjacent traditional commercial loading bays.

No changes to the Draft EIR are required in response to these comments.

F. ALTERNATIVES

The comment and corresponding response in this section cover topics Chapter 6, *Alternatives*, of the Draft EIR. The comments are grouped according to the following issues:

- AL-1: Alternatives Considered in the Draft EIR
- AL-2: New Alternative (Combination of A, B, C)
- AL3-: New Alternative (Market Street Transit Thoroughfare Project)
- AL-4: Combined Bike-Transit Lane
- AL-5: Mission Street Alternative
- AL-6: No Project Alternative

COMMENT AL-1: ALTERNATIVES CONSIDERED IN THE DRAFT EIR

- A-HPC-4
- I-Strassner-5

"Commissioner Black expressed that she would like to see a project alternative that includes protected bike lanes. The Commissioner found the DEIR otherwise complete and the alternatives evaluated appropriately." (*Aaron Hyland, President, Historic Preservation Commission, San Francisco Planning Department, April 2, 2019 {A-HPC-4])*

"E) The necessarily detailed discussion of construction phases and the projected immense impacts on transit and business indicates that the partial alternative will require immense justification to even be considered. The Project should find the capital or at least make all necessary provisions to minimize future impacts." (*Howard Strassner, Individual, Letter, April 5, 2019 [I-Strassner-5])*

RESPONSE AL-1

The first comment is from a summary of the Historic Preservation Commission's March 20, 2019 public hearing on the proposed project. This comment notes that HPC Commissioner Black would like to see an alternative that includes protected bike lanes, but otherwise found the Draft EIR to be complete, including the range of alternatives. The second comment notes that the impacts resulting from construction of the partial alternative (assumed to include both Alternative C, Partial Preservation Alternative 1, and Alternative D, Partial Preservation Alternative 2) would require immense justification to be considered, and that the project sponsor should either fund the project in its entirety or make other accommodations to minimize impacts from construction of one of these alternatives.

As described in Draft EIR Chapter 6, *Alternatives*, Section B, Alternatives Screening and Selection, p. 6-3, the consideration of alternatives carried forward for analysis in the Draft EIR was based on three key factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

With respect to the first comment, the project would implement raised bikeways (at sidewalk level), approximately 5 to 8 feet wide, in each direction on Market Street between the curb lanes and pedestrian through zone, as described in Draft EIR Chapter 2, *Project Description*, p. 2-59.

With respect to the second comment identifying concerns about the partial preservation alternatives, each alternative considered in the Draft EIR was developed to meet the three key factors listed earlier in this response. As described in Draft EIR Chapter 6, *Alternatives*, the two partial preservation alternatives were developed with the specific intent to minimize impacts on

the Market Street Cultural Landscape District, as required by CEQA. As it relates to Alternative C, Partial Preservation Alternative 1, this would primarily be achieved through replacement of the existing red brick sidewalk with materials that replicate the existing materials as closely as possible while still complying with accessibility requirements, and replacement of trees along Market Street with species that have similar characteristics to the existing trees. Alternative D, Partial Preservation Alternative 2, would achieve this through retention of existing streetscape features (i.e., existing red bricks in a herringbone pattern within the sidewalk area) on blocks where no modifications to center boarding islands or curbside transit stops would be needed. Draft EIR Chapter 6, *Alternatives*, discusses the impacts that would result from construction of both alternatives at an appropriate level of detail and compares these impacts to the proposed project, and this comment does not raise any specific environmental issues or questions regarding the adequacy or accuracy of the Draft EIR's analysis.

No changes to the Draft EIR are required in response to these comments.

COMMENT AL-2: NEW ALTERNATIVE (COMBINATION OF A, B, C)

- I-Katz-3

"A BETTER ALTERNATIVE

But a truly ideal alternative would look slightly different than anything you have proposed. This alternative would have minimal environmental impacts, and would offer far superior benefits to the community. It would rely primarily on Alternative A (No Project), while adding certain elements from Alternative B (Full Preservation) and Alternative C (Partial Preservation):

- Like Alternative C, it would add Copenhagen-/Køpenhavn-inspired raised bikeways. (However, as a fallback, it's entirely acceptable to keep the existing class II/class III bike lanes proposed in Alternatives A and B. I write this as a daily bicycle commuter.)
- Like Alternative A, it would impose no new restrictions on private-vehicle circulation. Don't kill off already-fragile businesses on Market St. – nor in the broader downtown – by restricting public access to them.
- Like Alternatives A and B, it would create no new intersection bulb-outs. Bulb-outs are a planning fad creates constant hazards and inconvenience for cyclists. After asking planners for years, I've still seen no empirical evidence that they provide any net safety benefit even to pedestrians. Actually, it's likely that they endanger pedestrians along with cyclists. Until some planner produces any empirical evidence that bulb-outs benefit anyone – and I mean empirical, longitudinal studies, not unproven theoretical assumptions based on shorter crossing distances – I'll rely on my real-world observation that they cause motorists to turn corners more erratically and unpredictably. As a

pedestrian, I feel much safer crossing a heavily-trafficked intersection without bulb-outs. And so should you.

- Like Alternative A, it would retain the current red-brick sidewalks. These were an important placemaking victory, which helped resurrect Market St. from its redevelopment-era low point. It would be idiotic sacrilege to replace them with drab, gray, urban-redevelopment junk, thereby plunging Market St. back to its seedy 1970s days. If there are genuine accessibility issues with the bricks – as identified by disabled-rights activists, not by bureaucrats – I'm certain that new materials are available to duplicate bricks' crucially vintage look in physically more-even surfaces.
- Like Alternative B, it would replace at least some of the Platanus monoculture – i.e., the drab, colorless sycamore/plane trees – with more-interesting trees of similar height & canopy spread. The goal should be to add fall and spring color to Market St., so as to make the street more welcoming. The plane trees were a mistake – they're hardy, but boring. I do not recommend killing any healthy trees, but I do recommend introducing colorful alternatives when unhealthy sycamores must be replaced. As models, look at the creative landscape architecture that has enhanced downtown San Rafael (liquid amber/sweetgum trees that turn a spectrum of colors in the fall) and downtown Walnut Creek (a diversity of carefully-chosen species, which together add a similar spectrum of colors).
- Like Alternative A, it would impose no new street furniture or Streetlife Zones. The existing street has plenty of life. Every mockup presented for this project would suck out that life, by imposing drab, uniform, institutional sidewalk blockages. Just preserve the street's life – don't mess it up with misguided bureaucratic planning.

DETRIMENTS AND NEGATIVE IMPACTS IN THE PROPOSED PROJECT

The alternative proposed above would make some aspects of Market St. better, without making anything worse. By contrast, Public Works'/SFMTA proposed project threatens many detriments." (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-3])*

RESPONSE AL-2

The commenter proposed an alternative; the commenter asserts that it would be additional and would have minimal environmental impacts but more benefit to the project.

As described in Draft EIR Chapter 6, *Alternatives*, Section B, Alternatives Screening and Selection, p. 6-3, the consideration of alternatives carried forward for analysis in the Draft EIR was based on three key factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible

- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

The proposed elements of the alternative suggested by the commenter exclude many components of the proposed project, would not be feasible, and would fail to meet several basic project objectives. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR, therefore no changes to the Draft EIR are required in response to this comment.

This section further details considerations regarding the sidewalk paving materials on Market Street, noting that the existing red brick sidewalks, though considered character-defining features of the Market Street Cultural Landscape District (an eligible historic resource) do not meet current federal or local accessibility requirements. This section of Draft EIR Chapter 6, *Alternatives*, summarizes difficulties for people in wheelchairs, who use canes, or have vision impairments to safely navigate existing sidewalks along the project corridor. Moreover, this section of Draft EIR Chapter 6, *Alternatives*, further notes that City policy requires that sidewalks be brought up to current accessibility standards in any location where the curb-to-curb width of the street is modified (expanded or reduced).

As described in Draft EIR Chapter 6, *Alternatives*, the preservation alternatives were developed with the understanding that, in any location where the curb-to-curb width of Market Street would be altered and/or other elements would entail removal of substantial areas of the red brick, the above-referenced federal and local accessibility regulations would require either a) the removal of all brick and replacement with more accessible sidewalk surfaces or b) retention of some brick, provided that a fully accessible and pedestrian access route of sufficient width (10 feet wide) was provided. The commenter's proposal to add sidewalk-level bike lanes similar to the proposed project (and Alternatives C and E) would thus be incompatible with retaining the existing red brick. Accordingly, the Draft EIR does not carry forward an Alternative that both a) provides physically separated bicycle lanes and b) retains the existing red brick sidewalks, because such an alternative would be inconsistent with City policies regarding meeting accessibility standards and thus is not feasible.

Alternative C was developed to provide the same sidewalk-level bicycle lane as the proposed project while replacing the existing red brick with paving materials consistent with Public Works Order 200369 included in Draft EIR Appendix 3. Public Works Order 200369 identifies standard paving materials, providing specificity on the shapes, sizes, and colors of paving materials which include a variety of color tones and which meet current accessibility standards for use in San Francisco's public rights-of-way. Materials that would be used in construction of the proposed project would comply with minimum requirements for public sidewalks identified in Public Works Order 200369, including requirements that call for pedestrian access

routes on new sidewalk surfaces to be as free of jointed surfaces and visually uniform as possible. The sidewalks would also be designed to meet the requirements of the California Building Code, and any further requirements of the Mayor's Office on Disability.

If sidewalk-level bike lanes are not feasible, the commenter states that the existing class II/class III bike lanes proposed under Alternatives A and B could instead be kept. Exclusion of the sidewalk-level bike lanes, along with exclusion of other changes under the project as suggested by the commenter, would effectively be the No Project Alternative (Alternative A) or the Full Preservation Alternative (Alternative B), which were both studied in the Draft EIR.

The commenter's proposed additional alternative would not impose any new private vehicle restrictions and would not entail the addition of bulb-outs at intersections. The additional vehicle restrictions and bulb-outs associated with the proposed project are directly connected to the basic project objectives of providing facilities that reduce the number of traffic fatalities, collisions, and severe injuries, as well as reducing conflicts between pedestrians and vehicles, and reducing pedestrian crossing distances. As stated in Draft EIR Chapter 2, *Project Description*, Section B, Project Objectives, p. 2-1, Market Street is a particularly high-injury corridor. Reducing the number of private vehicles while simultaneously providing pedestrian enhancements such as bulb-outs collectively contribute towards these project objectives.

Regarding the commenter's assertion that there is no empirical evidence supporting the use of bulb-outs to reduce crossing distances, the Federal Highway Administration documented in a 2016 study [28] that three leading transportation engineering organizations [29] each endorse reducing the width of crosswalks through intersections through curb extensions or bulb-outs. Such extensions not only enhance the visibility of pedestrians seeking to cross a street (i.e., they can better see if a car is approaching), the extensions reduce the width of the street a pedestrian must navigate and also act as a traffic calming measure by reducing vehicle speeds around corners and thus also can reduce the severity of vehicle-pedestrian and vehicle-bicyclist collisions. Similar findings were documented by the Oregon Department of Transportation in a 2005 study of curb extensions along a busy thoroughfare in Albany, Oregon.[30] This 2005 study concluded that curb extensions had the safety benefits of improving sight distance, shortening crossing distances, and reducing pedestrian exposure to turning vehicles.

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[28] Porter, C., et al., *Achieving Multimodal Networks: Applying Design Flexibility and Reducing Conflicts for Federal Highway Administration*, August 2016, https://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/multimodal_networks/fhwahep16055.pdf, accessed April 26, 2019.

[29] The three organizations are the American Association of State Highway and Transportation Officials, the National Association of City Transportation Officials, and the Institute of Transportation Engineers.

[30] Johnson, Randal S., *Pedestrian Safety Impacts of Curb Extensions: A Case Study for Oregon Department of Transportation and Federal highway Administration,* July 2005, https://nacto.org/docs/usdg/pedestrian_safety_impacts_of_curb_extensions_randal.pdf, accessed April 26, 2019.

With regard to trees, the commenter's suggestion that "some" of the existing trees should be replaced is noted and will be conveyed to the project sponsor and decision makers. The existing *Platanus* monoculture is a character-defining feature of the Market Street Cultural Landscape District. Removal of the monoculture as part of the proposed project (as well as removal and/or modifications of other character defining features) have led to the conclusion that the proposed project would have a significant adverse effect on the Market Street Cultural Landscape District. However, one of the objectives of the project is to correct the arboricultural deficiencies of Market Street, which are largely related to the presence of existing monoculture (see Draft EIR Chapter 2, *Project Description*, Section B, Project Objectives, p. 2-1).

Draft EIR Chapter 6, *Alternatives*, notes how some of the alternatives to the proposed project were formulated to contemplate avoiding or lessening the impacts to the cultural district through variations of the project design compared to the proposed project, including in terms of changes to street trees. The commenter's proposal to remove an unspecified number of trees and replace with "more colorful" trees is not clearly defined enough to enable precise comparison with the alternatives examined in Draft EIR Chapter 6. However, it should be noted that the trees identified to replace the existing *Platanus* monoculture were selected for a variety of characteristics, including resistance to disease as well as height and bulk characteristics to meet current City standards for tree maintenance requirements and safety.

Finally, the commenter states that there should be no new "streetlife" zones and no new street furniture. The proposed streetlife zones and the addition of street furniture help meet the project's objectives of making better use of the sidewalks, enhancing the sense of place, and furthering economic development objectives. Omitting streetlife zones and adding no street furniture would hinder achievement of these proposed objectives.

In accordance with CEQA Guidelines section 15126.6, an EIR need not evaluate every conceivable alternative to a proposed project; rather the EIR alternatives analysis must describe a reasonable range of alternatives that would feasibly obtain most of the basic project objectives and would avoid or substantially lessen the significant environmental impacts of the project. In summary, the Draft EIR did not and is not bound by CEQA to consider an alternative consistent with the commenter's proposal because that proposed alternative would not be feasible (i.e., cannot construct sidewalk-level bicycle facility without replacing the brick), and it would fail to meet several basic objectives of the proposed project.

No changes to the Draft EIR are required in response to this comment.

COMMENT AL-3: NEW ALTERNATIVE (MARKET STREET TRANSIT THOROUGHFARE PROJECT)

- I-Natvig-5
- I-Natvig-14

"It is also my opinion that the Market Street Transit Thoroughfare Project that was implemented in 1985 and operated from 1985 to 1989 and from 2003 to 2007 would be a superior and reasonable alternative, especially with minor modifications, that was not studied as discussed below.

I believe that the following facts and analysis fully support these conclusions:

DISCUSSION:

The "Market Street Transit Thoroughfare Project" implemented in 1985 grew out of the need to complete the Market Street Beautification Project" once the J, K, L, M, and N streetcar lines were moved into the new Muni Metro subway and from the existence of the new Transit First policy of 1973.

> Prior to 1985, all of the bus lines now on Market operated only in the curb lanes with the exception of the Geary lines inbound from 3rd to 1st. The result was chaotic with 3 and 4 buses attempting to load passengers at stops at once. Since there were a dozen or so different lines, patrons were constantly running back and forth trying to board their buses. There was no attempt to synchronize signals for transit even though the 1973 Transit First policy (Board of Supervisors Resolution 218 - 73) stated that "Municipal Railway vehicles and the vehicles of other transit systems will be given priority over all other uses, except for fire, police, or safety purposes, on designated "transit streets; and be it FURTHER RESOLVED, That all City agencies, In resolving conflicts between public transit and other uses of City streets, are hereby directed to resolve in favor of public transit; and be It FURTHER RESOLVED, the Department of City Planning, Public Utilities Commission in cooperation with the Department of Public Works, Is hereby requested to develop a complete system of transit preferential streets, to be completed within months of this date;… And be it FURTHER RESOLVED, That the Department of City Planning and the Department of Public Works shall include in this plan the following method of expediting transit service on the designated streets: Synchronization of traffic signals to the speed of transit vehicles, and…"

Implementation of the Transit First Policy was under the purview of the Transit Preferential Streets committee, later re - titled Downtown Streets Management committee around 1990, consisting of staff representatives from Muni operations and planning, Traffic Engineering then part of DPW, City Planning, the Police Department, and the Fire Department as needed. Discussion of a revised plan of what to do with Muni on Market after the streetcar lines were moved into the Muni Metro subway began around 1978. Consultants were hired around 1980 to prepare studies for a Muni operating plan and a plan for the reconstruction of the overhead trolley wire system and support poles in conjunction with the operating plan.

The traffic engineers contended that it was not possible to synchronize signals for transit due to the excessive variability in loading time. When later measured on Van Ness and on Market, the

standard deviation in loading time was found to be about 6 seconds which means that over 95% of stops for passengers would fall within the length of the 30 seconds of the green and yellow phases, i.e. plus or minus 2 standard deviations.

(There are three basic components to traffic signal timing: cycle length, phase splits, and off‐sets. The cycle length is the time from the beginning of the green light to the beginning of the next green light at an intersection. Phase splits refer to the number of seconds allocated to each green, yellow, and red phase for each direction of travel including sub‐phases for left turns and pedestrians, etc. at an intersection. Off‐sets the refer to the time from the beginning of green at one intersection to the beginning of green at the next intersection down the street. In order for signals to be synchronized on a street with a series of intersections with signals, the signals have to be on the same cycle length.)

Since the numbered intersections between 1st and 8th on Market are evenly spaced at 907 feet, that the travel time from stop to stop including 25 seconds of travel, 10 to 15 seconds net for acceleration, deceleration, and 15 to 20 seconds for loading would be just under 60 seconds, if the stops were then at the numbered intersection, if the lights are all on the same cycle length, i.e. 60 seconds, if they turn green at the same time, and if the in‐between intersections, i.e. Sansome, Montgomery outbound, 2nd inbound, Grant, Powel, Mason, Jones, and U.N. Plaza, turn green a few seconds later, then a transit vehicle could move up one stop per minute in either direction, get a green light just as it finishes loading, and almost never get a red light at the in‐between intersections.

There are two intersections and 1075 feet between Main and 1st Street which now allows for delay‐free timing in the in‐bound direction, but with a signal delay at Fremont outbound; though, if the green phases at Beale and at Fremont were lengthened to 27 seconds, signals could be timed for delay‐free operation in both directions at the same time. The distance from 8th to 9th is only 632 feet resulting in a travel time including stopping and loading of only 50 seconds which would result in a minor delay if 8th and 9th turned green at the same time on a 60 second cycle.

In 1985, the signal systems on Van Ness and on Market from Main to Van Ness were on a 60 second cycle, and the signals from 9th to Van Ness could be synchronized with Market east of 9th. After the Loma Prieta earthquake, those signals were put on a 75 second cycle off‐peak and 90 seconds peak to allow for a longer green split for auto traffic on Van Ness and 10th to compensate for the removal of part of the Central Freeway. Even so, the signal at 9th (with the cycle lengths changed to 75 and 90 seconds).

and at 10th and Market could be synchronized with Market and Van Ness for transit in both directions at the same time, but are not

As an additional refinement, the system implemented in 1985, included a 3 second stagger from numbered intersection to numbered intersection outbound which allowed for 63 seconds of

travel time from stop to stop outbound and 57 seconds inbound to allow for longer loading times outbound as well as reducing the chance of too many electric trolley buses starting at the same time and tripping a circuit breaker.

Since 90 buses per hour in a single lane results in frequent bunching of 3 or 4 buses at stops and delays in loading which would in turn cause buses to miss green lights even if the lights were optimally synchronized for transit, 4 - lane operation was deemed to be absolutely necessary. Four - lane operation also meant that there were rarely more than two buses at a stop at once, sparing transit patrons a lot of aggravation.

An essential feature of this system was that since autos accelerate much faster than transit vehicles, then an auto leaving an island ahead of a transit vehicle could reach the next island before the end of the green phase, pass through the numbered intersection, leave any following transit vehicles behind loading at the nearside stop, and continue down the street until it catches up to the next transit vehicle down the street. Since it would not be possible to overtake and pass any transit vehicle, the auto would then just follow the transit vehicle down the street. This principle also applied to autos turning onto Market in front of transit vehicles.

The 1985 system worked quite well except for two problems. Not all of the time savings were removed from the schedules resulting in the Muni drivers sitting through green lights to avoid running ahead of schedule. Also, back - ups from the Bay Bridge onto 1st St. and sometimes Beale or 4th blocked Market from time to time, especially on Fridays. Continued construction on individual blocks sequentially on Market to complete the reconstruction of the roadway, granite curbs, and the overhead wire also made it difficult to remove the excess time from the schedules between 1985 and early 1989.

Later in 1989, instead of removing the excess running time from the schedules, the green phases for Market St. were shortened in order to increase the green phases on the cross streets. This was done by Traffic Engineering in 1989 in response to the removal of the Embarcadero freeway after the Loma Prieta earthquake to accommodate the displaced autos now crossing Market on the surface. The result was that transit vehicles were blocked from loading at the islands since the autos no longer had time to pass the islands at the numbered intersection at the end of the green phases. The Transit vehicle would arrive at the islands at the beginning of the red phases, be blocked from loading by a queue of autos, sit through the red phase doing nothing, move - up on the next green phase, load during the shortened green phase, and then sit through another red phase. The transit vehicles were switched from leading queues of autos up and down Market to following the queues.

This change was not necessary since the additional traffic backups on the streets crossing Market were not that great, notwithstanding it greatly inconvenienced about 10% of Muni's total riders mainly to reduce inconvenience to non - residents commuting by auto into the City.

The green phases were restored in about 2003, and the system worked traffic‐signal delay‐free until 2007 when the traffic engineers began gradually undoing the transit‐optimized synchronization. The traffic engineers have provided no explanation for the changes which now cause red light after red light for transit riders.

The signal timings which were in place from 2003 to 2007 which were a slightly modified version of the 1985 system should work very well for both bikes and transit vehicles, especially if the curb stops were moved up next to the islands." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-5])*

"REASONABLE ALTERNATIVE RECOMMENDATIONS:

‐‐Reinstate the "Transit First" signal timings in place from 2003 to 2007 which was slightly improved from the 1985 to 1989 system. Make sure that the green phases for Market are at least 27 seconds.

‐‐Convert the curb lanes from UN Plaza inbound and to Hayes outbound to joint bike and transit lanes. This should also include mandatory right turn in the curb lanes for general traffic for 200 to 300 feet where right turns are possible.

‐‐The curb transit stops should be moved to a position as close to the head of the islands as possible. Since the one‐minute travel time from stop to stop corresponds to an average speed of 10 mph, this would work well for bikes. A bicyclist waiting behind a curb‐lane bus loading next to an island would be able to catch up to the curb‐lane bus at the next curb stop just as the light turns green resulting in bikes not having to stop at all.

Leap‐frogging of bikes by transit vehicles and other vehicles would be almost eliminated, occurring mostly only when the 5‐Fulton or the 38‐Geary pulls onto Market inbound or when a bike turns onto Market and then only when there is a transit vehicle waiting at a red light at the same intersection in the curb lane.

‐‐Remove the excess time, "air", from the schedules.

‐‐Prevent auto back‐ups on 1st St., and on Beale, and on New Montgomery from blocking the box at Market.

‐‐Install outside loud speakers on the historic trolleys to inform tourists, waiting at the inbound stops, of the various tourist destinations of the car to speed loading and reduce delays to following transit vehicles.

‐‐Make the block between Folsom and Harrison on 1st St. into the HOV route. Make Bryant and Sterling the main route for general traffic onto the lower deck of the bridge. Have lane 5 on the lower deck start at Sterling. Have lane 1 begin at Essex with lanes 2, 3, and 4 feeding from Interstate 80. Currently, 1st and Essex feed into lanes 1 and 2 and Interstate 80 feeds into lanes 3,

4, and 5 with the HOV lane on Sterling having to merge into lane 5. These changes would relocate the queue on 1st Street to Embarcadero - Bryant - Sterling or Main - Bryant - Sterling rather than blocking one third of Muni's service at Mission and at Market along 1st.

- - - Separate the stop relocation, rail reconstruction, and bike treatments from the major capital portions of the project. This would allow other essential capital refurbishments and most of the expenditure plans to go forward.

- - - Banning autos from driving on Market east of 8th St. would be a further benefit for both transit and bikes. Taxis and deliveries would have to be exempted. However, banning taxies and delivery vehicles from the curb lanes except when loading should be required. Banning non - transit vehicles from driving in the curb lane should reduce the hazard to bikes and buses from taxis and delivery vehicle loading at the curb. Regardless, restoring the transit - optimal signal timing would result in nearly all non - transit vehicles on Market queuing behind the transit vehicles as they travel down Market street without blocking transit at the islands, as was the case from 1985 to 1989 and 2003 to 2007, even when there were no transit lanes.

IMPLEMENTATION

Reinstating transit first synchronization would take a few weeks.

Placing the curb stops next to the islands would take a few months.

Removing the air from the schedules would take 3 to 4 months.

Implementing the curb transit/bike lanes would take about 6 months.

Making Sterling the 5th lane on the bridge and making 1st St. the HOV route would take about 6 months.

Adding outside loud speakers to the historic trolleys would take about a year.

The costs of these improvements would be trivial.

EXTRAORDINARY BENEFITS:

The results of implementing these recommendations would be:

- - Travel time for transit and bikes from Main to Van Ness in either direction would be about 12 minutes instead of 16 to 20 minutes.

- - Elimination of most in - motion conflicts between bikes and motor vehicles and most likely elimination of most accidents. When the 4 - lane system and transit optimal signal timing were implemented in 1985, accidents between transit and other vehicles and pedestrians both dropped by 41%.

- - Retention of a classic transit priority project that should have been a model for the rest of the Muni system and should be in the immediate future. If transit - optimal signal synchronization were applied to the rest of the Muni, especially if combined with nearside

loading bulbs or nearside loading islands, the average speed of Muni would increase by approximately 5%, the equivalent of adding roughly $35 million to the Muni budget, almost for free.

CONCLUSIONS

The optimal plan is very simple: one stop, one cycle, one minute.

Restoring the transit optimal signal timing, moving the curb stops up next to the islands, making the curb lane a bike/transit lane, and taking the "air" out of the schedules has to be the lowest hanging fruit imaginable." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-14])*

RESPONSE AL-3

The first comment in the above comment grouping states that the aforementioned Market Street Transit Thoroughfare Project would be a 'superior and reasonable alternative, especially with minor modifications that was not studied.' The comment provides a history of the development, implementation, and two terminations (1989 and 2007) of the Market Street Transit Thoroughfare Project. The second comment here summarizes and reiterates the commenter's assertion that they are providing a "reasonable alternative" to the proposed project. The comment states that the "reasonable alternative" would consist of a number of elements (e.g., reinstating the "Transit First" signal timing, converting curb lanes from United Nations Plaza inbound to Hayes Street outbound to joint bicycle and transit lanes) and states that all of these elements could be implemented within a year, would have "trivial" costs, and would result in the "elimination of most in-motion conflicts between bikes and motor vehicles and most likely elimination of most accidents.

As described in Draft EIR Chapter 6, *Alternatives*, Section B, Alternatives Screening and Selection, p. 6-3, the consideration of alternatives carried forward for analysis in the Draft EIR was based on three key factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

The elements of the commenter's proposed alternative that is the focus of these comments exclude many components of the proposed project, would not be feasible, and would fail to meet several basic project objectives. These comments do not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to these comments.

The first comment establishes that the Market Street Transit Thoroughfare Project was focused on improving transit travel times amidst existing traffic signals and provides a demonstration of the complexity and challenge of optimizing traffic signalization for both transit and automobile modes.[31] However, as discussed in the response to TR-3, Transit Impacts, in the subtopic titled "Proposed Project Traffic Signal Timing Assumptions" on p. 4-31, the changes the SFMTA has been making to signal timing on Market Street are necessary to improve pedestrian and transit safety, in accordance with the City's Transit First and Vision Zero policies. Furthermore, these signal timing changes on Market Street are consistent with current national and state standards, which have evolved over the years to improve safety for all modes of travel. Reinstating the "Transit First" signal timing that was in place from 2003 to 2007 while, at the same time, adhering to current national and state standards for pedestrian signal timing and achieving the goal of improved pedestrian and transit safety, in accordance with the City's Transit First and Vision Zero policies, is not feasible.

As described by the commenter, the Market Street Thoroughfare Project was more narrowly focused on just the objective of surface transit enhancement, and thus would not meet the other basic objectives of the Better Market Street project (e.g., provide an accessible sidewalk that identifies Market Street as one of the city's pre-eminent ceremonial streets; 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). Although the commenter's experience and proposed ideas are appreciated, the alternative that would result from implementing his "reasonable alternative" would fail to meet numerous basic objectives of the proposed project, including those listed in the previous sentence and others set forth in Draft EIR Chapter 2, *Project Description*, Section B, Project Objectives, p. 2-1. An alternative such as proposed by the commenter may have merit in terms of improving transit timing compared to existing conditions but would fail to meet most other basic objectives of the proposed project as described below.

The commenter's proposal lacks sufficient detail to fully assess how, or to what extent, the project objectives would be achieved. For example, the commenter's alternative does not provide any information on how it would meet the basic project objectives of improving accessibility for all user groups along Market Street (including people with disabilities, who may not be able to use existing center transit boarding islands and/or may experience exacerbation of mobility impairments due to the existing brick sidewalk surfacing), is unclear on the replacement of aging infrastructure, and does not provide dedicated bicycle facilities.

[31] Although not related to the Draft EIR for Better Market Street, it should be noted that the commenter's summary history of operations on Market Street from 1985 to 1989 and 2003 to 2007 omits discussion of the 1995 implementation of the F Market and Wharves Historic Streetcar line and incorrectly implies that the Embarcadero Freeway was demolished in 1989 (although closed after the October 17, 1989, Loma Prieta Earthquake, demolition of the Embarcadero Freeway did not begin until February 1991).

The proposed alternative does not include any specific components that would address accessibility issues regarding sidewalk surface materials. An essential component of the proposed project is to provide an accessible sidewalk that identifies Market Street as one of the city's pre-eminent ceremonial streets. Furthermore, the commenter makes an unsubstantiated claim that reverting signal timing back to the "Transit First" signal timing that was in place from 2003 to 2007 would improve bicyclist safety; however, the proposed alternative includes no provisions for physically separating bicyclists from vehicular travel lanes on Market Street, which is an essential component of the proposed project (i.e., provide a bicycle facility that reduces the number of collisions involving bicycles as much as feasible from Steuart Street to Octavia Boulevard). The proposed alternative also does not include any means for achieving the basic project objective that calls for replacing aging infrastructure on this section of Market Street when it nears the end of its useful life to keep people, goods, and City services moving.

Additional related discussion in response to the commenter's proposal for signal timing changes is provided in Response TR-3, Transit Impacts. The commenter is also invited to review Chapter 6, *Alternatives*, Section E, Alternatives Considered but Rejected, pp. 6-60 through 6-68, which summarizes the multi-year public engagement process that involved consideration of more than 20 different design concepts, options, and alternatives in the lead-up to preparation of the Draft EIR.

The suggestion to add informational speakers on the existing historic streetcars is shared with the project sponsor and decision makers and will be shared with decision-makers; speakers are currently being added to the interior of existing historic streetcars.

No changes to the Draft EIR are required in response to these comments.

COMMENT AL-4: COMBINED BIKE-TRANSIT LANE

- I-Natvig-12

"It seems that it is more likely that retention of the existing very wide 14.5 foot curb lane and converting them to combined bike‐transit lanes (except for right turns) and moving the curb bus stops adjacent to the nearside islands in combination with transit‐favorable/bike‐favorable signal synchronization would be safer for bikes than the "Better Market" proposals. Also, more enforcement against reckless driving would be more effective and could be implemented immediately." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-12])*

RESPONSE AL-4

The comment states that it 'seems more likely' retaining existing 'very wide' 14.5 foot wide curb lanes, converting them to 'combined bike-transit lanes,' and moving curb bus stops adjacent to

nearside islands, all coupled with transit-favorable/bike-favorable signal synchronization 'would be safer for bikes' than the proposed project.

The range of alternatives required in an EIR is governed by a "rule of reason," which stipulates that an EIR shall set forth only those alternatives that are necessary for informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6(f)) and potentially feasible (CEQA Guidelines section 15126.6(a)). This comment suggests an alternative that is substantially similar to previous options considered by the project sponsor, and which have been found to not meet a basic project objective of providing a bicycle facility that is designed to reduce the number of collisions involving bicyclists on Market Street. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

The Draft EIR Chapter 6, *Alternatives*, Table 6-2, Ability of Project Alternatives to Meet Project Objectives, pp. 6-23 through 6-25, evaluates the ability of the alternatives to the proposed project to meet project objectives, including the objectives of providing clearly delineated and separate bicycle facilities and to reduce collisions between bicycles and other vehicles. Draft EIR Chapter 6, *Alternatives*, Section E, Alternatives Considered but Rejected, pp. 6-60 through 6-68, describes the various design concepts and options studied over the past several years that lead up to the identification of the proposed project. Of the initial 17 design concepts and options initially investigated, one concept (XII) called for curb lanes to be shared by transit buses, automobiles, and bicyclists. As described in Section E, p. 6-60, this concept evolved into an option (Option 1, Design Concept A) considered in the 2016 initial study for the proposed project. As described in Section E, p. 6-66, this option was dropped from further consideration because the proposal to continue having bicycles, buses, and other vehicles share the curb lanes would not meet basic objectives to (1) provide a bicycle facility that reduces the number of collisions involving bicycles as much as feasible from Steuart Street to Octavia Boulevard and (2) reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible. In addition, please refer to Response TR-9, Enforcement of Private Vehicle and Transportation Network Company Restrictions, for further information on SFMTA's plan for increased education and enforcement during the first few months following implementation of the proposed project's vehicle restrictions, turn restrictions, and parking and loading changes.

In summary, the record shows that an alternative similar to that contemplated by the commenter (involving shared use of curb lanes) was rejected from further consideration because of its failure to meet basic project objectives. The commenter asserts but does not support with evidence the assertion that transit signalization could improve bicycle safety, although the assertion that removing private vehicles from Market Street east of Eighth Street would likely contribute to a reduction in vehicle conflicts with both bicyclists and pedestrians.

No changes to the Draft EIR are required in response to this comment.

COMMENT AL-5: MISSION STREET ALTERNATIVE

- I-Hyland-2
- I-Katz-7

"The proposed project will turn our grand pedestrian promenade into a cyclist racetrack and reduce the pedestrian zone by as much as 50%. If the current transit zone can't be redesigned to accommodate buses and bicyclists, I would ask if the bicycles could be moved to Mission Street. It might also be possible that some of the bus traffic on Mission Street could be moved to Market Street." (*Aaron Jon Hyland, FAIA, Attorney at Law, Individual, Letter, April 15, 2019 [I-Hyland-2)*

"MISSION STREET ALTERNATIVE SHOULD BE RECONSIDERED

The DEIR mentions this deleted element:

MISSION STREET ALTERNATIVE

The alternative included plans for enhanced bicycle facilities and the addition of a cycle track in both directions on Mission Street.

It then states that this Mission St. Alternative was removed, for what read like exaggerated reasons:

This alternative would result in a substantial delay to some San Francisco Municipal Railway (Muni) routes. Relocating all transit currently on Mission Street to Market Street would have resulted in the removal of all loading spaces on Market Street and a significant number of loading spaces on Mission Street, and it would not provide the highest achievable quality bicycle facility that maximizes the safety of bicyclists on Market Street. As a result, this alternative was eliminated from further consideration because it would not have met most of the basic project objectives, including reducing fatalities, reducing conflicts between different modes of transportation, and providing a protected bicycle facility on Market Street.

I would urge reconsidering Mission Street as the priority route for cyclists – but relying on class II/class III bike lanes, which could overlap with transit lanes. This would not require re-routing transit, nor removing loading spaces." (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-7])*

RESPONSE AL-5

These comments express support for the considered, but rejected, Mission Street Alternative, which included plans for enhanced bicycle facilities and the addition of a cycle track in both directions on Mission Street. The first comment states that the proposed project would "turn our grand pedestrian promenade into a cyclist racetrack" and significantly reduce pedestrian space. The commenter also suggests the consideration of moving all bicycle traffic to Mission Street and allowing some Mission Street buses to operate on Market. The second commenter requests reconsideration of the Mission Street Alternative.

As described in Draft EIR Chapter 6, *Alternatives*, Section B, Alternatives Screening and Selection, p. 6-3, the consideration of alternatives carried forward for analysis in the Draft EIR was based on three key factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

These comments request that a previously dismissed alternative, or an alternative substantially similar to it, be reconsidered. Alternatives and options that included bicycle facilities on Mission Street did not meet the basic project objective of improving the safety of bicycling conditions on Market Street. These comments do not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to these comments.

Draft EIR Chapter 6, *Alternatives*, Section E, Alternatives Considered but Rejected, pp. 6-60 through 6-68, includes a detailed discussion of alternatives considered but rejected. This section summarizes the multi-year planning efforts that preceded the environmental review, as well as those alternatives which were presented in the 2016 initial study prepared for the project.

Among the 17 design options and concepts that were the product of the multi-year planning efforts, four involved substantial modifications to both Market Street and Mission Street. One of these options proposed the relocation of bicycle and bus operations from Market Street to Mission Street. Section E cites a 2013 report (Draft EIR Appendix 11) in which all but four of these 17 options and concepts were rejected for various reasons (conflicts, infeasibility, cost, etc.). One of the four options involved expanding bicycle facilities on Mission Street. Section E further describes that the 2016 initial study for the Better Market Street project incorporated the concept of expanded bicycle facilities on Mission Street, evaluated as Option 3: Market Street + Mission Street (Complete Street and Transit Priority Improvements on Market Plus Bicycle Facility Improvements on Mission). This Option 3 was later rejected because it would not meet basic project objectives:

- Optimize the surface public transit system's capacity and travel times in the project corridor and vicinity;
- Provide facilities that reduce the number of traffic fatalities, collisions, and severe injuries to the extent feasible; and
- Reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible.

Draft EIR Chapter 2, *Project Description*, Section B, Project Objectives, notes that two of the basic objectives of the proposed project are related to improving bicycling conditions on Market Street. Section B provides background on the formation of these objectives, including citations regarding studies of collisions citywide, which indicate that Market Street has a high percentage of cyclist injuries and fatalities. Draft EIR Section 4.B, *Transportation and Circulation*, Figure 4.B-4, p. 4.B-23, shows the concentration of bicycle collisions on the portions of Market Street that lack distinct bicycle facilities. Draft EIR Chapter 2, *Project Description*, Section F, further notes that the proposed protected bicycle lanes would have distinct paving and physical separation from pedestrian areas to improve the safety of all users of Market Street.

Even if Option 3 were feasible and capable of meeting most of the basic project objectives (see above for a discussion of the basic project objectives Option 3 would not meet), it would not avoid or substantially lessen the significant environmental impacts of the proposed project. Conversely, this alternative may result in more significant environmental impacts from the rerouting of transit from Mission Street to Market Street, which would cause substantial delays for Muni routes 14/14R (contrary to the comment), loading restrictions on Market and/or Mission Street because of space constraints, and potential construction-related impacts when both streets are under construction.

No changes to the Draft EIR are required in response to these comments.

COMMENT AL-6: NO PROJECT ALTERNATIVE

- I-Katz-2

"Of the alternatives presented, Alternative A (No Project) is superior in every respect. Your own analysis shows that, compared to your proposed project or any other alternatives, it has the fewest negative environmental impacts. (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-2])*

RESPONSE AL-6

The commenter states that Alternative A, No Project, "is superior in every respect." As stated in Draft EIR Chapter 6, *Alternatives*, Section B, Alternatives Screening and Selection, p. 6-55, CEQA

requires that an environmentally superior alternative be identified among the alternatives analyzed. The environmentally superior alternative is the alternative that avoids or substantially lessens some or all of the significant and unavoidable impacts of a project. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines section 15126.6).

On the basis of comparing the extent to which the alternatives avoid or lessen the significant and unavoidable impacts of the proposed project, the No Project Alternative would avoid two of the significant and unavoidable environmental impacts of the proposed project, would not contribute considerably to any significant cumulative impact, and would not result in any other significant impacts. Alternative A would be the environmentally superior alternative; however, the provisions of section 15126.6 of the CEQA Guidelines require the lead agency to identify another environmentally superior alternative among the other alternatives (see also Table 6-2, p. 6-23, which indicates that Alternative A would not fully or partially meet any project objectives).

This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment. This comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

G. General Environmental Comments

The comments and corresponding responses in this section cover general subjects not directly related to a specific section of the Draft EIR. The comments are grouped according to the following issues:

- GE-1: Public Meetings and Outreach
- GE-2: Construction Impacts and Mitigation Measures
- GE-3: Environmental Impacts Addressed in Initial Study
- GE-4: Cumulative Projects

Comment GE-1: Public Meetings and Outreach

- I-Majeski-1

"Regarding the market street makeover, the articles I've read said there's been community and stakeholder input, but I work in the Civic Center, use Market Street all the time with rideshare, public transportation and on foot and never once did I see any sort of outreach. No newspaper

articles, social media campaign, bus shelter ads, nothing. Plus, what "community" provided input? Market goes through lots of neighborhoods that have tons of businesses but not many homes. And who asked for the makeover? This is like the Civic Center realm plan that just magically came about without any input from those working in the area and a handful of city planners who probably don't even live in the City let alone the Civic Center, deciding on what will make things look "pretty." (*Nick Majeski, Individual, Email, March 15, 2019 [I-Majeski-1])*

RESPONSE GE-1

This comment expresses concern for the level of outreach and community and stakeholder input. The lead agency has exceeded the requirements of CEQA in notifying members of the community and stakeholders about the environmental process for the proposed project. This comment does not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to this comment.

The remainder of this response identifies CEQA requirements for public and stakeholder notification, summarizes the efforts of the lead agency to comply with these requirements, and describes efforts that the project sponsor has taken above and beyond what is required by CEQA.

CEQA Guidelines section 15082 requires that the lead agency shall send a notice of preparation that an EIR will be prepared to the Office of Planning and Research (OPR) and each responsible and trustee agency and file with the county clerk of each count in which the project will be located.

CEQA Guidelines section 15087 requires that public notice of review of a Draft EIR shall be mailed to the last known name and addres of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures:

(1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.

(2) Posting of notice by the public agency on and off the site in the area where the project is to be located.

(3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

The planning department published an NOP for an EIR and notice of public scoping meeting on January 14, 2015. In addition to providing the NOP to OPR, the NOP was made available for review in the following ways:

- Notice of Availability (NOA) of the NOP was published in a newspaper of general circulation on January 14, 2015).
- A NOA was mailed to a mailing list of approximately 6,500 addresses, including other public agencies and interested parties on January 13, 2015.
- Copies of the full NOP were mailed to public agencies and interested parties on January 13, 2015.
- Copies of the full NOP were placed in the Main Library in the San Francisco Public Library system on January 14, 2015.
- The scoping period and meetings were announced on the project's web site: www.bettermarketstreetsf.org and the Planning Department's website: www.sf-planning.org/bmseir.
- The scoping period and meetings were announced at the Better Market Street Project Citizens Advisory Committee meeting on January 26, 2015.

The planning department published a NOA for public review of the Draft EIR for the proposed project February 27, 2019. In addition to providing the notice of completion and NOA for public review of the Draft EIR to OPR, the NOA was made available for review in the following ways:

- Copies of the NOA were mailed to a mailing list of approximately 8,600 addresses, including public agencies, NOP commenters, nearby owners and occupants, and other interested parties on February 26, 2019.
- 68 poster-sized were placed on Market Street throughout the project corridor for the duration of the public review period.
- Copies of the Draft EIR were placed in the Main Library in the San Francisco Public Library system and were also made available at the Planning Information Center.
- Copies of the Draft EIR were also mailed to approximately 40 local, regional, and state public agencies on February 26, 2019. An electronic copy of the NOA was emailed to approximately 2,185 addresses.
- Availability of the Draft EIR was announced on the project's web site: www.bettermarketstreetsf.org and the Planning Department's website https://sfplanning.org/project/better-market-street-environmental-review-process.

Beyond fulfilling the notification requirements for the proposed project under CEQA, the project sponsor, SFMTA, and the planning department have conducted extensive community outreach efforts for the proposed project, and as part of the environmental process leading up to

preparation and circulation of the Draft EIR. As noted in Draft EIR Chapter 2, *Project Description*, p. 2-6, the proposed project has been developed through careful consideration of design drivers and input from an extensive public outreach process. Formal public outreach for the project's conceptual design began in early 2011 as part of phase I. Participants from all over the city, including stakeholders from immediately adjacent neighborhoods, provided broad input through a series of coordinated workshops, online comments, social media, and other outreach venues. Three rounds of public outreach workshops and webinars were conducted from May 2011 to July 2013. Public notices for the workshops and webinars were distributed citywide. The public notices included, but were not limited to, press releases; postcards and flyers (in several languages); public service announcement videos, which aired on SFGovTV; more than 1,000 hand-distributed postcards; multi-language bus posters placed in bus shelters on Market Street; Better Market Street email newsletter blasts distributed to more than 5,000 people per round; notices to property owners along Market Street; workshop announcements posted through social media; and announcements and updates provided on the Better Market Street website at *www.bettermarketstreetsf.org*. A Community Advisory Committee was established during outreach in this phase to provide feedback between the project team (i.e., the project sponsor, SFMTA, and the planning department) and local residents, business owners, and community representatives. Additionally, at least 44 events were held with various stakeholder groups between 2014 and 2018 as part of the environmental review phase, including two public meetings held in March 2018 to present the refined proposal to the public.

COMMENT GE-2: CONSTRUCTION IMPACTS AND MITIGATION MEASURES

- I-Hong-3
- I-Hong-6
- I-Hong-8
- I-Hong-11
- I-Hong-13

"Is there a project time line for this work, i.e., from start to finish, Only to see how this project will impact the community, both north & south of Market Street and other adjacent projects.

• What provisions are being made to assist the business due to the loss of business along Market Street during Construction? These type of construction impacts have disrupted business with in the Central Subway (Chinatown), the Van Ness BRT projects.

Will this project include a Business Advisory Committee? Such as the Van Ness Business Advisory Committee (BAC) is made up of representatives from a diverse cross-section of Van Ness Project Corridor businesses. The Van Ness BAC meets monthly to provide

recommendations and advice on ways the City can support businesses during construction while providing a forum for businesses to resolve for issues related to construction. This committee also oversees development of marketing support for Van Ness corridor businesses." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-3])*

"**D. Construction Issues**

- There needs to be a better way to control construction dust, noise, vibration, control of both vehicle and pedestrian traffic during and after the on going construction work. At times both, Best Practices and mitigation does not work well.
- Will there be community notices communicating to the community as to what is happening with dates, and etc., such as the weekly MTA's weekly notices. I spoke to number of people and they too found this a wonderful tool. This included an on site Project Office.
- How or where will the construction workers park?
- Construction barriers/fencing should have some sort of mesh; both to hide the equipment, the staging of material and most to keep the dust/soil from impacting the areas." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-6])*

"• **Trees**: in a number of Figures it shows existing trees along Market Street to be either removed and or replaced. How will they be protected during the course of construction. If some are being replaced, maybe trees that do not shed as much leaves might be considered, it makes the street messy. Tree grates in some cases are not flush with the sidewalks walk ways, pedestrian are tripling [sic] over them" (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-8])*

"• During construction building get covered with dust and damaged, are there any provisions to fix this both during and after construction." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-11])*

"• **Construction work:** Like all these construction projects small and large - While there are Mitigation Measures in place, I feel there still needs to be more accountability with the Noise, Debris, Dust, staging of material and traffic control on this projects, including the use and operation of construction cranes. All to often history shows this type of work really impacts the business and residents and in some cases out of business. This is already a windy area. There is a need to coordinate this work, especially with the up

coming 1629 Market Street Project and a few others out there and to protect the adjacent brick buildings from construction vibration.

- **Construction projects/etc.:** small or large - I feel there needs to be more accountability with the; Noise, Debris, Dust, staging of material and traffic control all to often really impacts the business and residents. Should there be an in place joint type of communication process for meetings, notices, signs, person to contact for ongoing issues etc., with the local business', neighbors, agencies and etc. with dates and etc. Similar to the MTA Weekend Traffic notices, Construction Forecast Van Ness Improvement Project or Rain ReadySF. Just a loose thought. As I see it, Communication is a key to any projects success." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-13])*

RESPONSE GE-2

These comments address various construction impacts, provide suggestions for mitigation measures to reduce the project's impacts during construction, or request further details about the proposed mitigation measures. These comments do not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to these comments.

Comments request information about the construction approach for the proposed project, including the construction schedule, and the impact of the project's construction activities on other nearby projects and buildings. As discussed in the construction discussion in Draft Chapter 2, *Project Description*, p. 2-72, of the Draft EIR, construction of the proposed project is expected to commence in 2020, occurring at up to seven location-specific segments of multiple blocks along Market Street over at least a six-year period, including inactive periods. The overall duration of construction and selection of the phased approach for the proposed project are based on funding availability. If funding is not available, the overall duration of construction may be as long as 14 years. This assessment of construction activities under the phased approach presents a "worst-case," yet potentially realistic, evaluation of potential construction-period effects.

Other comments suggest that best management practices and mitigation measures do not work well at all times, and requests additional information regarding community outreach during construction and parking for construction workers. As described in Draft EIR Chapter 2, *Project Description*, p. 2-74, the project sponsor requires all construction contracts to include Public Works' standard construction measures (SCMs) in bid packages for the purposes of protecting human health and safety as well as environmental resources. Draft EIR Appendix 4 contains a copy of the SCMs and other measures. In addition, the Draft EIR includes robust mitigation measures addressing construction-period noise and vibration, air quality, and transportation impacts. Public Works SCMs would be legally enforceable through construction contracts, and

the project sponsor would be required to strictly adhere to the mitigation measures proposed in the Draft EIR as a condition of project approval. In addition, the mitigation monitoring and reporting program prepared with the project approvals discloses the scheduling, implementation responsibilities, and lead agency monitoring for all mitigation measures, as required by CEQA.

With respect to community outreach during construction, Mitigation Measure M-TR-1 requires the project sponsor to conduct construction coordination with adjacent businesses, which would include procedures developed with the Office of Economic and Workforce Development. The proposed outreach and engagement efforts would include the project website, Public Information Officer and ongoing communication support, and Business Impact Brochure describing possible impacts of upcoming project and resources available.

Other comments request that barriers and fencing be erected during construction to hide construction equipment and minimize the dispersal of dust. As stated in Draft EIR Chapter 2, *Project Description*, p. 2-73, of the Draft EIR, Market Street construction zones would vary in size but would always be separated from traffic and pedestrians by a buffer that would include a temporary barrier. In addition, as part of the historic resources SCMs, Public Works would develop a Construction Best Practices for Historic Resources Plan and Construction Monitoring for Historic Resources Program, which would include implementation of protective measures (e.g., protective barriers during construction) to prevent inadvertent collisions with and damage to adjacent historic architectural resources by construction equipment. In the case of historic structures, Public Works SCMs would require consultation with San Francisco Planning Department staff to determine if construction-related vibration has the potential to result in physical damage to those structures, and where such damage could occur, to document the existing conditions of the building and prepare a plan for construction monitoring. If damage to historic structures from construction-related vibration occurs, construction activities would be modified to avoid further impacts, and the building would be repaired to the pre-construction condition.

The specific material for the barriers and fencing that would be used during construction of the project would depend on the type of project construction activity underway, the proximity of nearby resources, and would comply with all applicable regulations and requirements. With respect to dust generated during construction, as described in Draft EIR Section 4.A, *Air Quality*, pp. 4.D-33 and 4.D-34, the project would be subject to the Construction Dust Control Ordinance, which requires construction contractors to minimize visible dust on construction sites through mechanisms such as watering construction areas, covering inactive soil stockpiles, and using dust enclosures, curtains, and dust collectors. Public Works SCMs, which would be included in construction contracts for the project, also include detailed dust control measures.

Another comment requests information about tree protection measures during project construction. As discussed in Draft EIR Chapter 2, *Project Description*, p. 2-62, the proposed

project would include the removal of all existing street trees on Market Street within the project corridor.

COMMENT GE-3: ENVIRONMENTAL IMPACTS ADDRESSED IN INITIAL STUDY

- O-CRP-3

"Our comments to the Better Market Street DEIR formally request that the BMS design team demonstrates how the BMS project will mitigate identified environmental impacts in these components of the plan:

- Paving – reduce the amount of impermeable surfaces to capture rainwater and conserve cleaning water and to encourage near-surface evapotranspiration
- Sequester storm water from sewage lines
- Capture fresh water from Market Street's high water table through landscaping and other methods
- Electrification - pocket parks and plazas to reduce use of internal combustion diesel-powered generators for food trucks and public performances
- Lighting – high efficiency LED with focused throw (also reduces light pollution)
- Landscaping – Increase clusters of multi-species plantings to create complex canopy anchored by maritime evergreen shade trees and encourage near -surface evapotranspiration" *(Kasey Asberry, Climate Reality Project: SF Action Group, Letter, April 14, 2019 [O-CRP-3]*

RESPONSE GE-3

This comment provides suggestions regarding the potential environmental impacts of the project that were addressed in the 2016 initial study. These comments do not specifically point to any deficiency in the analysis or conclusions of the Draft EIR. Therefore, no changes to the Draft EIR are required in response to these comments.

This comment requests documentation for how the proposed project would mitigate environmental impacts related to hydrology and water quality, including a reduction in the amount of impermeable surfaces and a suggestion for alternative tree planting techniques which would encourage evapotranspiration. As discussed on p. 80 of the 2016 initial study prepared for the project, the project could decrease the amount of existing impervious areas on Market Street with additional landscaping in the Streetlife Zones. Therefore, the amount of stormwater flowing to the combined sewer system would not increase, and may decrease. The

project may require the relocation or reconstruction of stormwater catch basins and combined sewer lines, as discussed in Draft EIR Chapter 2, *Project Description*, p. 2-66; constructing separate sewer lines and stormwater lines as suggested by the commenter is not proposed as part of the project.

Other parts of this comment states that the electrification of parks and plazas along the project corridor could mitigate the associated environmental impacts of the proposed project by reducing fossil-fuel consumption and greenhouse gas emissions. Electification of parks and plazas within or adjacent to the project area is not an activity proposed as part of the project. As discussed in the proposed project's 2016 initial study and included as Draft EIR Appendix 2, the proposed project would not result in significant GHG or energy impacts and no mitigation is required.

Another part of the comment suggests the use of LED lighting, which would reduce light pollution. As stated in Draft EIR Chapter 2, *Project Description*, p. 2-86, the proposed project would include pedestrian-scale lighting. The proposed project also includes removal, partial restoration, reconstruction, and realignment of the 236 Path of Gold light standards. The existing poles would be reinstalled with new interior lighting systems. Although the project would not include lighting with focused throw, the proposed changes to the Path of Gold light standards would not increase the potential for light and glare, consistent with Impact AE-4 in the 2016 initial study prepared for the proposed project.

No changes to the Draft EIR are required in response to this comment. Nevertheless, this comment will be provided to the project sponsor and decision makers for consideration in more detailed design of the project.

COMMENT GE-4: CUMULATIVE PROJECTS

- I-Haas-3
- I-Hestor-7
- I-Hong-4

"But even above that, the MTA and BART has a program to build canopies, as you know, for the openings. They have two finished, one near Powell Street and the other at 7th. They have, I understand, a contract out to build several, more one of which will be at 8th and possibly in front of the theater. The EIR needs to be adjusted to accommodate that development" (*Jim Hass, Better Market Street working group, Draft EIR Hearing Transcript, April 4, 2019 [I-Haas-3])*

"Project Setting - 2 - 11

Middle of page - commercial uses dominating along Market St. See above comment. Please provide list showing size of cumulative residential development approved and pending + cumulative HOTEL development for study area in this EIR. BOTH ARE SUBSTANTIAL." (*Sue C. Hestor, Attorney at Law, Letter, April 15, 2019 [I-Hestor-7])*

"• How will any of the Cumulative Projects be listed in the RTC? There are a number of major on going projects during the course of this Better Market Street renovation. Including overlapping and new projects. Will these be put in a table? Projects such as; 10 South Van Ness, 30 Otis, 1629 Market Street, 30 Van Ness, 1500 Mission Street, One Oak, 1554 Market Street. Not sure what guidelines were used to list these projects.

This list should include the HUB, Central SOMA, Western SOMA, Van Ness BRT, the Central Subway BRT and most recently the Geary BRT project. Only because most of these projects will be impacted by the Better Market Street work in some way or other." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-4])*

RESPONSE GE-4

These comments request information about the cumulative projects analyzed in the Draft EIR or suggest projects that should be considered cumulative projects. One comment pertains to a separate project involving modifications to select BART/Muni subway entrances on Market Street. One comment suggests the list of cumulative projects should include all of the pending and approved hotel and residential uses in the vicinity of the project corridor. Another comment identifies numerous development projects as well as transportation and area plan projects.

The cumulative analysis in the Draft EIR is complete, and these comments do not change the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

The first commenter is correct in noting that there is a separate but related project involving modifications to select BART/Muni subway entrances. This project, the BART Market Street Canopies and Escalators Modernization Project, has already modified some BART entrances on Market Street. Draft EIR Appendix 5 lists past, present, and reasonably foreseeable projects in and near the project corridor that potentially warrant consideration in determining cumulative impacts. Page 18 of Appendix 5 specifically identifies the BART Market Street Canopies and Escalators Modernization Project.

Draft EIR Section 4.A, *Cultural Resources*, examines the potential for significant cumulative impacts on cultural resources. On pp. 4.A-96 and 4.A-97 of Section 4.A, the BART Market Street Canopies and Escalators Modernization Project is noted as current/future project that is vital to consider in determining whether there is a significant cumulative impact on select cultural resources (i.e., the Market Street Cultural Landscape District, the Civic Center Landmark District, United Nations Plaza). The analysis in Section 4.A indicates significant cumulative impacts on all of these resources and concluded that the proposed project would contribute considerably to the significant cumulative impact on the Market Street Cultural Landscape District.

The remaining comments pertain to pending and approved hotel and residential uses in the vicinity of the project corridor, and other transportation and area plan projects. As stated in Draft EIR Chapter 4, *Environmental Setting and Impacts, Approach to Cumulative Impacts*, p. 4-16, discussion in the analysis of the potential cumulative impacts, including the potential for the proposed project's incremental effects to be cumulatively considerable, is based on past and present projects, described as part of the Environmental Setting, and a list of related proposed projects and plans identified by the City and neighboring jurisdictions and/or on full implementation of the San Francisco General Plan and/or other planning documents, depending on the specific impact being analyzed. Draft EIR Appendix 5 describes the proposed plans and projects that were considered in the cumulative analysis, in compliance with CEQA Guidelines section 15130(b)(1). The list of cumulative projects identified in the Draft EIR was most recently updated in February 2019 (prior to publication of the Draft EIR). The list of projects considered includes all of those identified in the comment.

H. GENERAL NON-ENVIRONMENTAL COMMENTS

The comments and corresponding responses in this section cover general subjects not directly related to a specific section of the Draft EIR. The comments are grouped according to the following issues:

- GNE-1: General Comment
- GNE-2: Scope of Project

COMMENT GNE-1: GENERAL COMMENT

- A-CT-1
- A-CT-3
- A-GGBHTD-1
- I-Anne-5

- I-Avallone-4
- I-Cauthen-4
- I-Folsom-1
- I-Hong-1
- I-Miguel-2
- I-Natvig-1
- I-Strassner-1
- I-Yates-1
- O-CRP-1
- O-WSF2-1
- O-WSF2-5

"Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR.

Project Understanding

Project proposes to implement the Better Market Street Project. The proposed project would redesign and provide a program of transportation and streetscape improvements on Market Street from US 101/Octavia Boulevard (Blvd) to The Embarcadero. The proposed project would introduce changes to the road way configuration and private vehicle access, traffic signals, surface transit including San Francisco Municipal Railway only lanes, stop spacing and service, stop locations, stop characteristics, and infrastructure, bicycle facilities, pedestrian facilities, streetscapes, commercial and passenger loading, vehicular parking, and utilities. Regional access is provided on the US 101/0ctavia Blvd on- and off-ramps and US 101/S Van Ness Avenue and US 101/Mission Street on- and off-ramps 1000 feet south of Market Street. *(Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review, Caltrans District 4, PO Box 23660, Oakland, CA 94623, April 15, 2019 [A-CT-1])*

"**Lead Agency**

As the Lead Agency, San Francisco Department of Public Works is responsible for all project mitigation, including any needed improvements to the STN [State Transportation Network]. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures, prior to the submittal of an encroachment permit. Potential mitigation measures that include the requirements of other agencies-such as Caltrans-are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the Lead Agency.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit http://www.dot.ca.gov/hq/traffops/developserv/permits/." *(Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review, Caltrans District 4, PO Box 23660, Oakland, CA 94623, April 15, 2019 [A-CT-3])*

"The Golden Gate Bridge, Highway and Transportation District (District) has reviewed the Better Market Street Project Draft Environmental Impact Report (DEIR) and offers the following comments.

The District operates Golden Gate Transit service connecting San Francisco with North Bay communities across a network of 24 bus routes that cross the portion of Market Street that is the subject of the DEIR." (*Ron Downing, Director of Planning, Golden Gate Bridge Highway & Transportation District, April 11, 2019 [A-GGBHTD-1])*

"Please don't tell me to attend a meeting; it is very difficult for me to do so." (*K. M. Anne, Individual, Email, March 13, 2019 [I-Anne-5])*

"I am copying Janice at SF Bicycle Coalition in hopes these improvements get into the plan in some way. Thank you for the consideration and the opportunity to make Market Street a safe street for all" (*Vince Avallone, Individual, Email, March 24, 2019 [I-Avallone-4])*

"It is hoped that the new entrances to the Market Street subway stations will add to, rather than detract from the ambiance of S.F.'s main street." (*G. Cauthen, Individual, Email, March 21, 2019 [I-Cauthen-4])*

"I've lived in San Francisco (in the Sunset) for over 40 years. For 30 of those years I worked mainly for the City and County. I had polio as a child, and have walked on crutches for most of my life. My church, where I go 3 times a week, is located at 9th and Market. I am active there in a project to help the homeless and those on the street in our neighborhood." (*Bruce Folsom, Individual, Email, March 14, 2019 [I-Folsom-1])*

"Thank you for the opportunity to continue to comment on the above Projects DEIR (February 27, 2018). In addition to my email comments to the SF Planning Commission of 4/15/2019 and others, here are my comments to this Projects – Due date of 4/15/2019. Please continue to include my emails to the Project file. Sorry if they continue to be redundant to my past and present comments. Only because I believe several Planners were involved with this Project from the very start. Should anyone have any questions to my comments, please feel free to reach out to me at the above email. I trust this email works, only because the internet on my side is barley hanging on. I have tried to put my comments in to some sort of logical sections as follows, no specific order: " (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-1])*

"And aside from the comments on the DEIR, I would like to thank Commissioner Moore and Director Rahaim for recognizing the passing of Corinne Woods. It has been my pleasure to work with her for many, many years on waterfront-related situations. She is -- has been a font of knowledge. I don't think anyone understands the waterfront in the manner in which she did. It is a tremendous loss for the city." (*Ron Miguel*, *Individual*, *Draft EIR Hearing Transcript*, *April 4*, *2019 [I-Miguel-2])*

"I was a planner at Muni from 1976 to 2012 and attended around 300 transit priority planning meetings with Traffic Engineering, City Planning, police, fire, and Muni Planning and Muni Operations staff. I also attended another 300 or so internal Muni staff meetings with planning, operations, schedules, and public communications staff where transit priority, and other operations and safety issues were discussed. Also, I attended around 250 trolley overhead wire planning and design meetings. These include nearly all of the meetings where Market Street planning and operations were discussed. I was a co‐recipient of the 1986 MTC Grand Award for my part in developing and implementing the Market Street Transit Thoroughfare Project. (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-1])*

"Thank you for the opportunity to comment on the subject DEIR. I appreciate your electronic publishing of the DEIR to save paper, printing and mailing cost. This large document includes useful details describing provisions for transit, pedestrians, bicyclists and automobile drivers that describe the scope of the Project. The comments below include suggestions for additional provisions for transit and transit riders as well as some the usual requests for additional study:" (*Howard Strassner, Individual, Letter, April 5, 2019 [I-Strassner-1])*

"Upon reviewing the artists rendition of the utopian partial market street closure to cars I believe the renditions to be false advertising. There is a critical and real omission from the artists rendition: There are no bums depicted hassling pedestrians or flopped about. Additionally, there are no urine stains, feces, discarded hypodermic needles or trash in the "park" or streets. Complete fraud." (*Gene Yates, Individual, Email, March 14, 2019 [I-Yates-1])*

"The Better Market Street Project, in Draft Environmental Impact Review (DEIR) until April 15 5PM, is a phased infrastructure project on Market St extending between Steuart St & Octavia St. The BMS will remove bricks and repave sidewalks, replace lighting and street furnishings, redirect traffic flow, renew storm water and sewer lines, replant street trees and other landscaping. Phase 1 is funded for 5th through 8th Streets and is slated to begin in Fall 2019.

The CRP SF Action Group advocates seizing all opportunities to achieve a carbon neutral City infrastructure as immediately as possible. In the context of the Better Market Street Plan which is designed to endure for the next fifty years this public backbone will have a profound impact on all other public and private development during the precise period of time where deep changes must occur in order to mitigate catastrophic climate changes due to global warming." *(Kasey Asberry, Climate Reality Project: SF Action Group, Letter, April 14, 2019 [O-CRP-1])*

"Walk San Francisco is San Francisco's only pedestrian advocacy organization speaking up for the city's 884,000 residents, 265,000 weekday commuters, and 24.6 million visitors who walk in the city each year. Our vision is to make walking in San Francisco safe for everyone, so our community is healthier and more livable. Walk SF has closely followed the Better Market Street (BMS) project and has participated in regular meetings with project staff. We have also been an active member of the BMS CAC I Community Working Group." (*Jodie Medeiros, Executive Director, Walk San Francisco, Letter, April 15, 2019 [O-WSF2-1])*

"LOS measures the flow of people, but it is up to regulatory entities to specify the appropriate level that will meet the goals of a given project. The City's selection of D as an acceptable LOS

for Market Street seems arbitrary. One of the goals of the proposed project is to "Provide an appropriate pedestrian throughway" (2-2). What is unclear is how the City decided that an LOS of D or higher would allow them to meet this goal and what they are measuring "appropriateness" against." (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-5])*

RESPONSE GNE-1

Comments were received that are general in nature and do not address a specific environmental issue in the Draft EIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

The first comment is an introductory comment indicating that the California Department of Transportation (Caltrans) has reviewed the Draft EIR and summarizes the proposed project. The second comment reiterates the City and County of San Francisco's (City's) responsibility for project mitigation and states that details regarding the project's fair-share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be discussed for all mitigation measures. The City acknowledges and accepts this responsibility. The Draft EIR discloses the fair-share contribution and financing information for the proposed project, its variant, and alternatives, while the mitigation monitoring and reporting program prepared with the project approvals discloses the scheduling, implementation responsibilities, and lead agency monitoring for all mitigation measures. In addition, the project sponsor would adhere to all Caltrans procedures and permit requirements. As indicated on Draft EIR p. 2-91, a temporary encroachment permit is among the required permits listed in Table 2-2, Anticipated Permits and Approvals that are Reliant Upon Certification of the EIR. Another comment identifies the current number of Golden Gate Transit buses serving San Francisco. Information on Golden Gate Transit bus routes in San Francisco is presented on Draft EIR p. 4.B-14.

The comment regarding entrances to the BART/Muni stations has been acknowledged, however improvements to the station entrances themselves are not part of the proposed project. Please refer to Response GE-4, Cumulative Projects, for further information on the BART Market Street Canopies and Escalators Modernization Project.

Other comments include a request to not be asked to attend meetings, acknowledgement of the opportunity to provide comment on the proposed project, biographical information on living and working in the City, an observation for the passing of Corrine Woods, an acknowledgement of the publication of the Draft EIR, and commentary on a subjective experience of Market Street. The final comment requests an explanation of how the City decided on an LOS standard for measuring the flow of people on sidewalks.

No changes to the Draft EIR are required in response to these comments.

COMMENT GNE-2: SCOPE OF PROJECT

- O-WSF1-7
- A-HPC-3
- A-SFPC-3
- I-Anne-3
- I-Berggren-2
- I-Cauthen-1
- I-Haas-2
- I-Hong-7
- I-Hong-10
- I-Hong-12
- I-Karren-1
- I-Medel-1
- I-Strassner-2
- I-Strassner-4

"The final thing I'll say is this is a new design, to have a sidewalk-level bike lane, so we really want the city to be careful in the design process and really thoughtful for all the places that bicyclists will mix with pedestrians. So, we want all of those places -- the intersections, the mid-block crossings, and even on the sidewalk to be tested before implemented" (*Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-7])*

"The HPC made the following general comments on the Draft Environmental Impact Report:

Commissioner Johnck commented on the importance of a plan to maintain and preserve the landscape and questioned whether a maintenance plan was included in the project." (*Aaron Hyland, President, Historic Preservation Commission, San Francisco Planning Department, April 2, 2019 {A-HPC-3])*

"Look very carefully at existing, but also at future transit gateways. If we look at Paris, where each transit access is a piece of art on its own, I do think that we can use this moment to not only emphasize and simplify how we get into transit, but how we also mark the succession of Market Street with those portals.

"There is Embarcadero, Montgomery, Powell, Van Ness, Central Subway, et cetera. I believe that the EIR should kind of put a big mark into having that addressed in a way that anticipates the design theme and the rhythm about what happens in these gateways. I'm not saying that they need to be all immediately redesigned, but we have to anticipate what will work well in the future." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript, April 4, 2019 [A-SFPC-3]*

"Speaking of bins, I hope that recycling bins will be re‐introduced. The green solar bin things are all very well, but they will not recycle my aluminum beverage cans, and they are difficult for less‐mobile users to use. (Also: I'm very tired of being told that ramp improvements must wait until this already delayed plan goes through, but somehow new bins, bike lanes, and other features sneak onto Market frequently.)" (*K. M. Anne, Individual, Email, March 13, 2019 [I-Anne-3])*

"I am deeply concerned, however, by the state of streets adjacent to the project, especially the SOMA side of Market Street. Most of the streets are designed to favor high-velocity, feeder traffic in that they are multi-laned, one way conduits of cars and are quite unsafe as well as noisy and unappealing for walkers and cyclists. This is the super-block neighborhood of the city, with lengthy distances from street to street, another unfavorable element of urban planning in terms of walkability and general scale.

While the BMS plan is commendable, in and of itself, it will be launched with a drag in its effectiveness in as much as the adjacent streets are not traffic-calmed by such mitigations as robust network of bike pathways (such as the raised lanes proposed in BMS from 2020) that tie into Market Street and the rest of the city, and the changing over of automobile traffic from one-way to two-way.

Also, the use of bikes by intercity commuters will greatly increase if the paradigm is 'reset' so that the planning takes into account the whole set of criteria that constitute bike friendliness that attracts large numbers of two-wheeled commuters in other places. I therefore urge the city and its SFMTA to look at the bicycle as a decongestant tool in its planning of the city's streets, bearing in mind that topography is a false argument given the rise of the electronic assist bicycle.

Please check out the 14 criterion for bicycle planning here:

http://copenhagenizeindex.eu/criteria.html." (*Christopher Berggren*, *Individual*, *Email*, *March 14*, *2019 [I-Berggren-2])*

"Placing bicyclists where they are safe from moving vehicles and parked vehicles, and where they cannot impede bus travel, should be a prime objective. Bicyclists should not be permitted to weave in front of a bus, or turn in front of a bus (except legally in crosswalks), or slow down a bus in any other way. This should apply on all bus streets, not just on Market." (*G. Cauthen, Individual, Email, March 21, 2019 [I-Cauthen-1])*

"So, it makes a comment on page -- I think it's -- it would be 4A, 63 and 64, letting the cultural resources, that the existing portals to the underground transit stations will not be disturbed. That is not accurate. First of all, the city has had a policy of getting rid of these stone or cement portals where it could. DPW removed two and replaced them with a fence-like structure which is safer and also doesn't attract graffiti, and so that policy should be continued." (*Jim Hass, Better Market Street working group, Draft EIR Hearing Transcript*, *April 4*, *2019 [I-Haas-2])*

"**F: Miscellaneous Issues:**

- Can the recent Planning Commissions meeting of 4/11/2019 - Adopted measures be included:

    - City wide culture resources survey.

    - Biodiversity Design Guideline/Urban Forest Plan.

• There is a need to clean up the over head wiring, cameras, wireless devices, etc. along this route. *(Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-7])*

- Vacant store fronts with bill boards should not be allowed. If roll down grills are used, some get graffiti painted over these roll down grills.
- Convention Center, can a satellite version of this be stationed some where along Market Street? The older location at Powell was convenient. Only that the new relocated center is inconvenient to the tourist. Especially if they are not attending a convention. What will the old convention center be used for (Powell)?" *(Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-10])*

"• Utility boxes, ATT boxes, trash bins, Street Signal boxes etc., needs to be painted with graffiti proof paint or even better allow some art work on some of them. In Oakland at the 12th Street BART station they used this process along Broadway and it is nice to see. The newer trash bins are nice to.

• The corner of Market and Grant & O'Farrell is a unique place for a musician to play some wonderful music, can this be part of the project?

• Some of the news stands have a unique electronic advertisement on the back of the news stands, They work nicely.

• There should be standards to the street signage and adjusted to be visible, in some case they get obstructed by too many signs and trees, etc.

• **Retail Space:** The project will also bring the much needed new retail that will revitalize and help keep the Market Street corridor area alive, including the current retails shops. As a starter, how about some small pop ups, maybe have the SF SBA help secure a few new business in the now vacant City Center at 6th and Market (?), possibly the visitors convention center." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-12])*

"I have take a look at the report and the concern that I have brought up a few times has not been fully addressed.

In the report you mention the concerns about vehicles exiting the garage at One Bush and how you are going to allow them to still make the right turn on Market and then the right on Sutter. Thank you for that.

However, what about those like myself that park in the Shell Building garage or the One Front Street garage and need to make that same turn? Both of these garages exit on Battery and if we have to go up the hill we the best way for us is to use the Battery Street Bridge to make that same turn One Bush uses onto Market and then Sutter. The report mentions that the bridge will be closed. Will we be allowed to use that dip for the One Bush Street garage to make the turn or will we be forced onto First and go several blocks out of our way?" (*Leslie Karren, Individual, Email, March 25, 2019, [I-Karren-1])*

"Please put more 4 way crossing intersections on market street, especially one on 5th and market. The 30 Stockton bus turn there is a hazard for both the bus driver and pedestrians crossing." (*Alex Medel, Individual, Email, April 15, 2019, [I-Medel-1])*

"A) It is good that pedestrians will have the right-of-way relative to cars exiting the One Bush parking garage. This can be easily accomplished with a pedestrian push button and a traffic

light for the cars. Buses on Market Street, which have provisions for transit signal priority, should also be able to control this light for priority right-of -way." (*Howard Strassner*, *Individual*, *Letter*, *April 5*, *2019 [I-Strassner-2])*

"C)The EIR includes descriptions of bicycle and pedestrian facilities that will enhance safety and convenience. But, Market Street is also a major transit resource. The following Transit First suggestions, should be added to the EIR as provisions which will enhance the convenience of pedestrians who are about to become Muni riders. At a minimum the Project should include all necessary provisions so that future expensive disruptions will not be required:

C-1) Center Boarding Islands will have to be long enough for two or three transit vehicles. Therefore the Project should provide at least two safe marked paths for a pedestrian/Muni rider to get from the sidewalk across the bicycle lane and traffic lane to every island.

C-2) The Project should provide signs showing which bus will stop where, for both curb and center boarding islands, so that Muni riders will able to wait where their bus will arrive. This will speed up boarding and reduce running time.

C-3) The Project should provide large legible route signs, at every boarding area that are visible to a potential Muni rider from across the street.

C-4) Many potential Muni riders can take more than one route to get near their ultimate destination, but on Market Street optimizing where to wait for a bus can be difficult. The Project should include provision for multiple next bus signs on both sides of Market Street so that potential Muni riders can select the best route for their trip, whether in or out bound, and where to efficiently cross Market Street or a lane to access a boarding island.

D) Late, late night use of Commercial loading zones could be further incentivized by allowing parking on the sidewalk as long as there was some minimum pedestrian passage space. (*Howard Strassner*, *Individual*, *Letter*, *April 5*, *2019 [I-Strassner-4])*

RESPONSE GNE-2

These comments relate to the scope of the proposed project. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

Comments request that the project sponsor be careful in the design process for spaces where bicyclists will mix with pedestrians and keep bicyclists safe from moving vehicles and parked vehicles, and not impede bus travel. The design of the proposed project includes a 1 to 3 foot buffer between the proposed sidewalk-level protected bikeway to maintain separation between

people walking on the sidewalks and bicycles, which would also separate bicycles from the transit lanes on Market Street.

One comment expresses the importance of a plan to maintain and preserve the landscape and asks whether a maintenance plan was included in this project. At this time there is no maintenance plan associated specifically with the project; however, Public Works will continue to maintain trees and other landscaping features, consistent with current maintenance agreements.

Other comments relates to other statements by the commenter and other speakers at the Planning Commission regarding the project's proposed "rhythm" of transit stops along Market Street. The proposed project would indeed modify the spacing of above-ground transit stops (curbside transit stops and center transit boarding islands) along Market Street, although it would not modify existing BART/Muni station portals. Regarding opportunities to include artistic elements and otherwise enhance the sense of place at different points along Market Street, this portion of the comment is highly consistent with the placemaking objectives of the proposed project, discussed in Draft EIR Chapter 2, *Project Description*, Section B, Project Objectives, p. 2-1. These placemaking objectives seek to instill a "memorable and active identity" for the project corridor, which is recognized as the City's "pre-eminent ceremonial street," which calls for the use of high-quality materials. Draft EIR Chapter 2, Section F, "Streetscapes," notes that the proposed project would incorporate public art elements. While neither specific art installations nor locations have been determined at the current level of project design, the suggestion that entrances to public transit (i.e. Muni and BART stations) themselves represent opportunities to incorporate public art is noted and would be shared with the project sponsor.

One comment requests that recycling bins be reintroduced. The proposed project would include standard trash and recycling bins. The next comment notes the difficulties in physically attending meetings. This concern has been noted. The next three comments, from Vince Avallone and Christopher Berggren, regarding design improvements and suggestions for bicycle planning, have been noted and provided to the project sponsor and SFMTA for their consideration.

One commenter cites Draft EIR Section 4.A, *Cultural Resources*, pp. 4.A-63 and 4.A-64. These pages include the analysis of potential project effects on the Market Street Cultural Landscape District (an eligible historic resource). The pages cited by the commenter accurately indicate that the "repeating pattern" of BART/Muni subway entrances is one of many character-defining features of the Market Street Cultural Landscape District. These pages also correctly state that the proposed project would have no effect on the repeating pattern of BART/Muni subway entrances.

Other general comments suggests that the citywide cultural resources survey and recent efforts to bolster the 2018 Citywide Biodiversity Policy, both of which were discussed at the April 11, 2019 Planning Commission hearing, be included as part of the proposed project. One comment also suggests that overhead wiring and other aboveground infrastructure should be cleaned up as part of the project. Other portions of this comment relate to private storefronts and provide a suggestion for a new convention center on Market Street. Although the proposed project would replace the overhead contact system (OCS) wires as discussed in Draft EIR Chapter 2, *Project Description*, p. 2-55, no other provision is made to specifically address the visual look of existing features in the streetscape other than those proposed as part of the pedestrian through zone and Streetlife Zones. The remainder of these issues are outside of the purview of the proposed project.

Other comments are related to streetscape features, including utility boxes, trash bins, and news stands. The use of graffiti-proof paint was also suggested. As noted in the Draft EIR Chapter 2, *Project Description*, p. 2-61, the proposed project would include "Streetlife Zones" along Market Street. These Streetlife Zones would allow the installation of features such as street trees, street furniture, benches, moveable tables and chairs, sidewalk planting areas, small retail stands (e.g., flower sellers, food carts), public restrooms, advertising kiosks, wayfinding signs, real-time transit information, newsstands, bike-share stations, dockless bicycle-/scooter-share parking, and bicycle racks. The project would also include wayfinding signage. All site furnishings would receive graffiti-resistant coatings.

One comment noted appreciation for an existing space on Market Street where musicians perform. Although the project would not include any dedicated spaces for musicians, one purpose of the Streetlife Zones is to encourage the public to use the spaces in a variety of ways. This could include spaces where musicians could perform and the public could enjoy their performances.

The comment notes difficulties for the Muni 30 Stockton bus route and asserts hazardous conditions for people walking at the intersection of Market Street/Fifth Street. Since reopening of Stockton Street in February 2019, the Muni 30 Stockton route was rerouted back to Stockton and Fourth streets, and therefore the turning challenges for bus drivers at Fifth Street noted in the comment no longer exist. Refer to Chapter 2, *Project Description*, Figure 2-3, pp. 2-23 to 2-42 for an illustration of the proposed intersection improvements along the Market Street project corridor.

One comment suggests that a traffic signal could be installed at the location of the One Bush Street parking garage driveway. As discussed on Draft EIR Section 4.B, *Transportation and Circulation*, p. 4.B-69, the One Bush Street parking garage exit driveway onto Market Street would be reconfigured to intersect the pedestrian through zone at the Market Street sidewalk grade, with a ramp at the curb rather than the existing uniform grade from the garage exit through the entire width of the sidewalk. In addition, the signal controlling the parking garage

driveway and Battery Street between Bush and Market streets would be removed. It would not be possible to include a traffic signal for the exiting driveway, as suggested in the comment, without also providing a traffic signal for people walking and bicycling along the Market Street sidewalk and sidewalk-level bikeway. A midblock pedestrian signal within the sidewalk with the proposed sidewalk configuration would not meet city and state standards. Furthermore, because a green light for the exit driveway would indicate vehicle right-of-way, it could result in conflicts with people walking who may not be aware that they are required to stop and yield to the exiting vehicle. Under the proposed design, drivers exiting the parking garage via the Market Street driveway would need to yield to people walking and bicycling along Market Street.

For informational purposes, the project sponsor is working with the One Bush property owner regarding operation of their existing driveway in relation to the proposed project. As part of those conversations, the One Bush property owner may include measures on their property (e.g., a garage exit gate that would limit the Market Street exit to 60 vehicles per hour, "Yield to Bikes" and "Yield to Pedestrians" signs that would prioritize pedestrians and bicyclists over exiting vehicles, and traffic diverters [which could be in the form of safe hit posts] that would prevent other vehicles from using the One Bush Street parking garage entrance as a cut-thru to get onto Market Street).

A commenter provided a recommendation to signage to assist transit riders on Market Street access their desired stops and provide clear pathways for access. These comments will be considered by the project sponsor and SFMTA during preparation of the detailed design of the project. The final comment pertains to incentives for late night loading. At this time, the City does not have any plans to allow commercial loading vehicles to park on sidewalks.

No changes to the Draft EIR are required in response to these comments. Nevertheless, these comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

I. MERITS OF THE PROJECT

The comments and corresponding responses in this section are related to merits of the proposed project. The comments are grouped according to the following issues:

- ME-1: Support for the Proposed Project
- ME-2: Opposition to the Proposed Project
- ME-3: Economic/Business Impacts
- ME-4: Support for the Western Variant
- ME-5: Opposition to the Western Variant

- ME-6: Opposition to Private Vehicle Restrictions
- ME-7: Transportation Network Companies and Taxi Access
- ME-8: Transit Stop Spacing
- ME-9: Retention of Materials

COMMENT ME-1: SUPPORT FOR THE PROPOSED PROJECT

- I-Anne-2
- I-Avallone-1
- I-Berggren-1
- I-Bowers-1
- I-Doyle-1
- I-Haas-1
- I-Hong-2
- I-Hong-14
- I-Mauro-1
- I-Oatman-Stanford-1
- I-Robertson-1
- I-Schlansker-1
- I-Thorsen-1
- I-Weiner-1
- O-SFBC1-1
- O-SFBC1-3
- O-SFBC1-5
- O-SFBC2-1
- O-SFBC2-6
- O-SFTR1-1
- O-WSF1-2
- O-WSF1-4
- O-WSF1-8

- O-WSF2-3
- O-WSF2-7

"I am pleased to see that the pedestrian - unfriendly accessibility - hazard red bricks have been scrapped; I hope the alternative will be sensitive to the needs of cane, crutch, and wheelchair users. I am also glad that the center boarding islands will be widened (and presumably all of them will be ramped), as it is often difficult to board a bus lift from those platforms safely. Bus drivers have to position themselves precisely to make sure I can get on the lift between the clutter of fencing, trash bins, and bus shelters. Many bus operators give up and board/off - board wheelchair users in the street." (*K. M. Anne, Individual, Email, March 13, 2019 [I-Anne-2])*

"I have been tracking the Better Market Street project for years. I am glad it continues to move forward, even though I'd prefer to be in construction already. I understand, a project like this takes time to capture the vision, community outreach and the coordination with many agencies and stakeholders. I appreciate all the time and effort from many people. I am a bicycle commuter along the Market Street corridor every weekday from Castro to Battery. My main interest is for the safe travel of cyclists as we work towards SF's Vision Zero. With the recent safety incidents, we have a lot of work to do and the sooner the better." (*Vince Avallone, Individual, Email, March 24, 2019 [I-Avallone-1])*

"Regarding the Better Market Street project's next steps' probable proceeding next year, as reported by Hoodline.com earlier this week, I am 100% in favor of the elimination of private automobile traffic so that this iconic S.F. street is made safer for all and becomes closer to what it should be - a hub of shopping, business, transit, and community." (*Christopher Berggren*, *Individual*, *Email*, *March 14*, *2019 [I-Berggren-1])*

"I am a San Francisco resident, and I approve of the plans to close Market Street to private cars. In addition, there should be fees put into place for bringing your private car to the downtown area." (*Scott Bowers*, *Individual*, *Email*, *March 14*, *2019 [I-Bowers-1])*

"I endorse this plan to close Market from Octavia to the Ferry Building. I live in Bernal Heights (6 Montezuma 94110)." (*Doyle Hunte, Individual, Email, March 13, 2019 [I-Doyle-1])*

"I'm Jim Haas. I live at 100 Van 7 Ness. I am a member of the Better Market Street working group, and I've been a member of its predecessor committees. And, as you know, I'm involved

in the Civic Center in many ways. Generally, I'm strongly in favor of the plan and I think the EIR draft is by and large accurate and inclusive. I do -- it took forever to prepare, as you know, and things have changed in the interim" (*Jim Hass, Individual, Better Market Street working group, Draft EIR Hearing Transcript, April 4, 2019 [I-Haas-1])*

"**A. General Comments:**

- My initial comments to this projects DEIR of February 27, 2019, including the DEIR-IS. I have reviewed this document and I fully support this long over due project.
- As of this date, my full support remains unchanged.
- Planning Commission: Both the 4/4/2019 and the April 11, 2019 Planning Commission meeting went well and with great support. Will this meetings trans-script be documented in the RTC?" (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-2])*

"In closing: I'm a native and a property owner of San Francisco for seventy plus years. Studied both City Planning and Architecture, a retired Construction Project Manger. Currently living in District seven (thirty-five plus years prior to that in District 3 for thirty years. Worked in the HUB area for twenty five plus years. Again, to me and in my opinion, this is another win win project for the city. The San Francisco Planning Department has done a fine job with this DEIR and cove

In the rush to get these comments out I hope this makes your dead line of 4/15/2019 by 5PM. Looking forward to - RTC. I can only hope this DEIR is placed on a fast track approval process." (*Dennis Hong, Individual, Email, April 15, 2019 [I-Hong-14])*

"Saw a post on nextdoor telling people to email you to say they don't want market blocked to cars, so figured I'd put my two cents in the other direction. I think it's great! I'm honestly in favor of taking cars off of every road possible, so you'll always have my support in these endeavors." (*Jacqueline Mauro, Individual, Email, April 10, 2019 [I-Mauro-1])*

"I strongly support this project to improve Market Street and make it more friendly to people walking, biking, or taking transit.

As our supervisors declare a climate emergency and we plan to add thousands more housing units to the central city to accommodate jobs and avoid sprawl, Market Street will become an even more important backbone for our city. For too long, it has been unattractive and unfriendly for pedestrians, and clogged with private vehicles and dangerous ridehail drivers. I do have some concerns that the plan's intersections are still not adopting safe enough standards

for people on foot or on bike (i.e., protected intersections as is the norm in major European cities), but overall it is a definite improvement.

I urge the Planning Dept. to approve the document and speed the construction of Better Market Street ASAP. The more delays, the more people who will be harmed (and even killed) by Market Street's unsafe conditions today." (*Hunter Oatman-Stanford, Individual, Email, April 5, 2019 [I-Oatman-Stanford-1])*

"Thank you! Godspeed!!." (*David Robertson, Individual, Email, March 12, 2019 [I-Robertson-1])*

"I am writing in support of restricting private traffic on large sections of Market Street.

I work above Market and Taylor and commute from Glen Park via BART. Discouraging private car usage and encouraging pedestrian and bike usage is key to revitalizing the historic San Francisco downtown. Cars generate noxious fumes (and we continue to find out that the manufacturers lie about how noxious they are!) and leak oily residue everywhere, and the honking is as incessant as the stop and go traffic. Prioritizing Muni service, safer bicycle‐ways, streetcar improvements, and pedestrian usage will give us happier and healthier residents and visitors on a more equitable basis than simply prioritizing those of us who choose to own a private vehicle or pay for simultaneously expensive yet VC-subsidized "ride-sharing" services. Access to spontaneous customers would hopefully spur revitalizing the currently shuttered storefronts of mid‐upper Market.

Market Street has long been the pride of San Francisco. It's time to give it a much needed investment and update to once again be the gem of the West Coast of the United States." (*Steven Schlansker, Individual, Email, April 7, 2019 [I-Schlansker-1])*

"I saw the EIR report for the Better Market project, and I am totally in support of it. I have been commuting by bicycle every weekday along the length of that corridor (starting from Glen Park) for three years, and it's clear to me that private drivers don't know how to manage the mix of taxis, busses, and bikes. Especially the Uber drivers.

I've seen and experienced a lot of close calls. Implementing this plan will vastly improve the safety of Market street for all and will get us closer to Vision Zero. Let us not delay in implementing it." (*Holly Thorsen, Individual, Email, March 13, 2019 [I-Thorsen-1])*

"Just wanted to say the plan looks great!" (*Rockwell Weiner, Individual, Email, March 13, 2019 [I-Weiner-1])*

"Good afternoon, Commissioners. Charles Deffarges, senior commute organizer on staff at the San Francisco Bicycle Coalition, here to speak in support of the Better Market Street project on behalf of our 10,000 plus members as it will finally create a safe place for people biking on San Francisco's main thoroughfare where right now basically we have nothing." (*Charles Deffarges, San Francisco Bicycle Coalition, Draft EIR Hearing Transcript, April 4, 2019 [O-SFBC1-1])*

"Better Market Street is the most important project for the safety of people biking in San Francisco today, really, so we need to take this opportunity to create a street that is safe and inviting for all users to prevent future lives lost.

The proposed project will make Market Street safer for people biking with the sidewalk-level bike lanes, which we are in full support of." (*Charles Deffarges, San Francisco Bicycle Coalition, Draft EIR Hearing Transcript, April 4, 2019 [O-SFBC1-3])*

"Ultimately, the Better Market Street project is key to the future of San Francisco not just for people biking, but for everybody that uses the street, and we need to do everything we can to create a safe street so everyone in the city can feel safe using Market Street. This will determine how safe and inviting Market Street is for decades to come, so we really can't squander this opportunity by limiting safety measures. We need to do as much as we can for a really great project Thank you for this project to comment on the project. We'll be submitting more detailed written comments to address the draft environmental report directly." (*Charles Deffarges, San Francisco Bicycle Coalition, Draft EIR Hearing Transcript, April 4, 2019 [O-SFBC1-5])*

"On behalf of the San Francisco Bicycle Coalition I am writing to provide feedback on the Better Market Street Project Draft Environmental Impact Report (DEIR), released February 27, 2019.

With over 10,000 members supporting our mission of promoting the bicycle for everyday transportation, our vision for Market Street, the backbone of San Francisco's transportation system, is simple: A corridor that provides a safe, inviting bike route for everyone, regardless of age or ability.

This project addresses the fundamental issues that make Market Street the third most dangerous corridor in San Francisco and one of the top priorities for the city's Vision Zero strategy. Thousands of people ride Market daily, each one of them risking injury or death as they navigate the street unprotected. Collisions are frequent on Market and about 60 percent of the collisions on Market involving people biking occur between Third and Eighth Streets, where bicycle facilities do not currently exist.

The Better Market Street project will finally address the safety needs of the many people who bike on Market Street. Protecting people riding from traffic with sidewalk-level bike lanes will

provide a space that is calm, comfortable and safe for everyone. Private automobile restrictions along the corridor will keep Market street open to people while also helping San Francisco achieve our mode share and climate goals." (*Charles Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-1])*

"Beyond our above comments, the Better Market Street Project will greatly enhance the safety of people riding bikes along our main thoroughfare. The project's bicycle facilities are a significant improvement from baseline conditions and the proposed improvements will help San Francisco achieve Vision Zero. The San Francisco Bicycle Coalition fully supports the project and we look forward to riding a transformed Market Street that better reflects our city's values and priorities." *(Charles Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-6])*

"**Segregated Bike lane and general traffic changes:**

We are strongly in support of the concept of establishing segregated bike lanes along Market Street to reduce impacts of bike riders on Market Street transit operations, assuming they can be created without denigrating transit operations. We are similarly in support of restrictions proposed on general traffic movements to reduce delays due to the volume of general traffic on Market." (*Rachel Hyden, Executive Director, and Peter Straus, Member, Board of Directors, San Francisco Transit Riders, Letter, March 29, 2019 [O-SFTR1-1])*

"First, I want to say we support the proposed project along with the Western Variant. We're extremely excited to see private vehicles off the street because we know that's going to keep people safer." (*Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-2])*

"We're also really excited that the crossings on the north side of the street are going to be improved for pedestrians.

As we all know, it's kind of hard to navigate that north side of the street if you're a pedestrian. You have to cross once and then cross again, and what that does is it puts you in conflict with vehicles twice, and it's a travel burden for people.

So, we're really excited to see those intersections closed up. It's a fantastic improvement for pedestrians." (*Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-4])*

"So, in summary, the devil is in the details, so please get those right for pedestrians, but, in general, we think this is a great project that will make Market Street better for everyone thank you." (*Cathy Deluca*, *Policy and Program Director*, *Walk San Francisco*, *Draft EIR Hearing Transcript*, *April 4*, *2019 [O-WSF1-8])*

"It is time for the city to make Market Street the grand boulevard it is meant to be, so we applaud the city departments for addressing the safety needs that the Better Market Street Project is poised to deliver." (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-3])*

"Beyond our comments, Walk SF firmly believes the Better Market Street Project will bring vital and 1ong-awaited safety improvements to Market Street, and we are grateful to see the City prioritizing people walking, biking, and taking transit.

Thank you for the opportunity to comment on this document. Please feel free to contact us for clarification or additional comments." (*Jodie Medeiros*, *Executive Director*, *Walk San Francisco*, *Letter*, *April 15*, *2019 [O-WSF2-7])*

RESPONSE ME-1

The comments provide personal observations and support for the proposed project. Some of these comments state specific support for proposed vehicle restrictions, sidewalk-level bikeway; improvements designed to improve bicyclist safety and help to achieve Vision Zero; pedestrian intersection crossing improvements; and other safety measures associated with the proposed project. One comment states support for the proposed project and the Western Variant.

The comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments. These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-2: OPPOSITION TO THE PROPOSED PROJECT

- I-DeLong-1
- I-Dora-1
- I-Hennig-1
- I-Judith-1

- I-Katz-1
- I-Katz-11
- I-Kohn-1
- I-Majeski-2
- I-Natvig-9
- I-Wright-3

"Your plan to stop traffic on Market Street is the most foolish thing I've ever heard of. Leave things alone, they have been fine for 100 years" (*Frank DeLong, Individual, Email, March 13, 2019 [I-DeLong-1])*

"Perhaps before making any "betterment" projects a reality, City officials should drive the expected changed routes. Shutting off Market Street to Octavia would steer all traffic to Hayes Valley, which ALREADY is COMPLETELY dysfunctional with traffic concerns.

If you want a City full of bikes and no cars, just let all the parents know and shut down all the schools. Parents have been BACKED AGAINST THE CORNER with each "improvement" project made. DON'T FORGET WHO PAYS TAXES.

The City complains of low enrollment in public schools, yet continue to push parents out of the City. The quality of education is abysmal because all the funding is going towards UNNECESSARY street projects that just keep making life worse.

It's easy to recommend "betterment" when it doesn't affect you personally. DON'T FORGET WHO PAYS TAXES. Make a calculation of all the tax reductions if all families have moved out of this city that DOES NOT CARE ABOUT FAMILIES" (*Dora-Dora-Bo-Bora, Individual, Email, March 13, 2019 [I-Dora-1])*

"Don't do it. As it is it is almost impossible to get south of Market and without escape options on Market in high traffic times one will never have access to that area." (*Warren Hennig, Individual, Email, March 13, 2019 [I-Hennig-1])*

"Thank you for allowing me to state some of my whimsical comments for your new immense traffic dystopian plan. I am thrilled by this no car development. Maybe now the city will finally fill the foot deep potholes that litter the road scape, turning bicycles and scooters into projectiles splashing people all over the road breaking bones. While I am musing, how about a collective of

autonomous free ridership on on - time buses with walk on and walk off floating platforms? Segway that into free electric bikes or scooters on Market to get us to where our actual cars are parked two miles away? No Uber or Lift or Taxi's? I don't think so, says our resident automaton laughing Sal until you say so, so we can get the hell away from this mess you will be creating? Who knows? Maybe we'll adjust to more traffic jams brought to us by the city that knows how to make significant traffic jams because our traffic lights are not interlinked or timed for people to get to wherever they are free to roam?

What are you trying to do? Take away free choice? What are you trying to fix with this plan? Do you know? Why not make the electric underground trains free below Market, paid for and powered by free plastic recycled into gas powering the city's electric utilities? Imagine, recycling plastic into gas and oil into perpetuity and a car free boulevard?

Okay? I guess the proof is in the yeasty parts of all the dough needed to pull off this boondoggle that will last years and take out more businesses and store fronts like Van Ness? Where's the Boring Company when you need them? Stuck in Cow Hollow?" (*Judith, Individual, Email, March 13, 2019 [I-Judith-1])*

"Thank you for accepting these comments on the Draft Environmental Impact Review.

I work around the corner from Market Street, and I'm a daily cyclist, transit rider, & pedestrian in the Market Street corridor. So I'm the intended client for the proposed project's claimed improvements. And I strongly reject what the sponsoring agencies (S.F. Public Works and the SFMTA) have proposed.

What would Jane Jacobs say about the proposed project? It's disastrous. It proposes to repeat the wretched errors of 1950s redevelopment folly, and to produce similarly sterile, barren, and uninhabited results. It proposes a gray monoculture. banishing red bricks and excluding vehicle access. It would restrict and uglify Market St., making people go away. It's designed for bureaucrats, not for people. It would degrade conditions for street users, small businesses, entrepreneurs – and everyone else who makes a city live, breathe, and work for its residents. It would replace life with death in the heart of a great American city.

Therefore, it must not be implemented." (Michael Katz, Individual, Email, April 4, 2019, [I-Katz-1])

"The proposed project obliges a small, vocal faction of cyclists who've gained outsized influence with City government, and who insist on claiming Market St. from the icky cars. This is childish identity politics. Most people who commute by bikes just want to ride our bikes in safety and convenience. We'd be much better off on Mission St.– or on any of several other streets that parallel to, or tangent from, Market St.

Instead of wrecking Market St.'s economy and vitality, planners should be focusing on providing basic amenities (like un-rutted pavement) on these alternative routes. And on encouraging cyclists to use them." (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-11])*

"I am sick of you people making this city worse and worse for a handful of selfish bicyclists. This city needs better traffic and fewer bicycles. You don't seem to care at all about the tens of thousands of residents who drive in this city every day – the people who make this city actually work for all the people who won't work. You have already destroyed Valencia Street and Van Ness Avenue with this idiocy, and I intend to do all I can to keep you from destroying the rest of the city." (*Bob Kohn, Individual, Email, April 1, 2019, [I-Kohn-1])*

"Market Street is a citywide asset, not just a Soma/Tenderloin/Waterfront/FiDi issue, and something this significant, which will cause HUGE problems for all the streets that run along Market, should be more of a topic decided on by the voters. I'm all for less cars, but I feel like this is a solution in a search of a problem." (*Nick Majeski, Individual, Email, March 15, 2019 [I-Majeski-2])*

"- - - Moving stops away from the numbered streets means that the many patrons walking south of Market would have to walk further, further cancelling any other time savings for them.

- - - The "better" Market Street proposal calls for removing the island stops where about one quarter of F‐line patrons board. Since half of transit patrons generally walk less than 1/8 mile to transit stops and a substantial portion of F‐line patrons are tourists and unfamiliar with Muni, this stop reduction could cause a loss of patronage of up to 25% for the F‐line.

- - - One justification for eliminating some of the islands is that they are not accessible to wheelchairs, and it is not possible to make them accessible. Removing them does not make them accessible. Rather, it should be possible to make the narrow islands adjacent to the BART entrances accessible by extending the islands upstream, narrowing the sidewalk a bit, and widening the island at that point. Also, not all handicapped people are in wheelchairs; spreading the stops further apart would force people who have difficulty walking to walk further.

- - - Splitting several of the routes into limiteds and locals, placing the limited stop buses at the reduced number of island stops and then relocating the local cohort of the routes now in the center lanes to the curb lanes would increase the number of routes loading at the curb stops, thereby, reinstating the pre‐1985 loading chaos and increasing the confusion and aggravation of patrons trying to find their bus from an increased number of routes trying to load at the same time and at the same stop.

Also, patrons would be further aggravated by not having stops where both local and limiteds board." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-9])*

"This is urbanism from the 1950s – trying to separate each kind of traffic. Instead of a 'grand civic boulevard' you are trying to turn it into dead space. If your goal is to rid the city of small businesses, you're on the right track." (*David S. Wright, Attorney at Law, Individual, Email, April 1, 2019 [I-Wright-3])*

RESPONSE ME-2

The comments express opposition to the proposed project, suggesting that the project has no merit, would drive residents out of the City, and would produce a sterile urban environment. Other comments suggest that the project is influenced by bicyclists to the detriment of other users, that the elimination of boarding islands would limit accessibility, and that the City should focus on providing other services.

One comment suggests that center boarding islands were removed because it is not possible to widen them at their current location to accommodate wheelchair users; however, this is not the case except at BART portals. The proposed project includes removal of 6 inbound and 6 outbound center boarding islands to provide stop spacing that supports rapid transit service, consistent with stop spacing on other rapid routes in the city. The remaining boarding island stops would all be reconfigured to accommodate wheelchair users in compliance with ADA standards. The commenter's suggestion to extend the narrow boarding islands adjacent to the BART entrances upstream by narrowing the sidewalk and widening the island at that point would not allow for boarding islands that would be ADA accessible in their entirety and would not address accessibility between the sidewalk and the ADA-compliant ramp. This would also result in wheelchair users being required to travel a longer distance on the platform to reach the ADA accessible area.

These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments. Nevertheless, these comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-3: ECONOMIC/BUSINESS IMPACTS

- A-HPC-5
- A-SFPC-6

- I-Hong-20
- I-Katz-4
- I-Khristie-1
- I-Maley-1

"• In response to public comment expressing concern regarding the proposed traffic pattern modifications near Zuni, a long-standing restaurant located at 1658 Market Street, the HPC urged the Planning Commission to review the potential impacts of the project changes to that business." (*Aaron Hyland, President, Historic Preservation Commission, San Francisco Planning Department, April 2, 2019 {A-HPC-5])*

"And last, but not least, I would support concerns that members of the public today also expressed, on Zuni and change of circulation of patterns around Zuni as a legacy or potential legacy business that means a lot to all of us." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript, April 4, 2019 [A-SFPC-6])*

"**FAILED TRANSIT MALL MODEL**

The proposed project is essentially a transit mall. This is far from a new idea: Transit malls were tried, and repeatedly failed, in the 1970s. They failed because they created sterile, uninhabited environments that people stayed away from. Here are just a few examples:

- Philadelphia's Chestnut Street: Before it was transit malled, it was Philadelphia's principal retail corridor. The transit mall basically killed the retail district. Commerce shifted to other streets, notably South Street, which maintained vehicle access.
- Toronto's Yonge Street: Reportedly North America's longest street. Its downtown core was transit malled in the 1970s. The experiment was deemed a failure, after it led to multiple business failures and made a lively area sterile and drab. It was undone before it claimed further victims.
- Vancouver's (B.C.) Georgia Street mall: This has been retained as a transit mall. As a result, one of North America's most beautifully-situated, densely populated, cities has a strangely sterile and unwelcoming downtown. Residents gravitate instead to interesting neighborhoods near the western beaches, like Kitsilano. (Where there is private-vehicle access.)

Why would San Francisco want to replicate this clearly failed model – and to kill many downtown businesses, in an experiment that will predictably fail? " (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-4])*

"Here is a radical idea fix the good damn streets and stop worrying about the impact on the environment. Because the economic impact is much more relevant to the people of SF.

I drive for a shuttle company and my customers complain about the city streets and overall look of the city in general." (*Art Khristie, Individual, Email, March 14, 2019, [I-Khristie-1])*

"Re: Proposed changes to Market Street traffic configurations, flow and access as described in the Better Market Street, Western Variant D - EIR, Octavia Street to 300' East of Hayes and Market Street intersection, and resulting impact on businesses and residents between Octavia and Van Ness Avenue.

The Better Market Street, Western Variant as described in the D - EIR proposes substantial changes in the traffic flow and access to the section of Market Street between Octavia and Van Ness Avenue.

The proposed changes include:

- No right turn from Southbound Van Ness onto Market St. preventing access for continuing westbound traffic on Market St.
- Southbound traffic on Van Ness would be re - routed before Market Street to Gough Street as access to continuing West on Market.
- Westbound Market Street traffic travelling via Gough Street, would be directed to left turn lanes onto Paige Street, and then a right turn onto Market Street to continue westbound on Market Street, or directed to right turn lanes off Gough Street to continue westbound on Market Street.
- Eastbound traffic on Market Street would be re - routed, to southbound 12th Street, and no traffic allowed beyond 12th Street.
- Eastbound traffic on Market Street would continue to be allowed left turns onto Franklin Street.
- Westbound traffic on Market Street will be diverted at Hayes Street and not allowed to continue Westbound beyond this intersection.

Current traffic patterns allow westbound traffic beyond the Hayes Street/Market Street intersection, Van Ness Avenue right turns onto Market Street for westbound traffic, providing

access to the commercial businesses, i.e. restaurants, bookstores, hotels, motels, retail stores and residences between Van Ness Avenue and Octavia.

The Better Market Street's Western Variant's, proposed changes to traffic configurations detailed in the D‐EIR do NOT adequately address mitigation of the potential impact on businesses and residents of Market Street between Van Ness Avenue and Octavia Streets within the Western Variant.

Market Street businesses and residents between Van Ness Avenue and Octavia Street rely on the current flow of traffic destined to these enterprises, and has been the access patterns customers/visitors have become accustomed to for decades.

The proposed changes described in the Better Market Street Western Variant, would dramatically alter flow patterns, inhibiting the current access between Van Ness Avenue and Octavia Street, severely impacting the local businesses and residents.

The majority of the businesses and residences in these blocks have been in place for decades, some more than 40 years, and have evolved a loyal following of customers and visitors.

Although the BMS Western Variant's proposed traffic flow changes will not completely prevent traffic access to this section of Market Street, the changes will require a substantial effort to re‐educate the public on accessing the businesses and residences in this section of the Western Variant.

RECOMMENDATIONS:

In advance (immediately as feasible) of the construction, implementing the proposed changes in the Western Variant, whatever the final changes may ultimately be, we strongly suggest the project's sponsoring City agencies and departments, confer with the affected businesses and residences to discuss implementation of new directional signage, a public 're‐education' campaign about the upcoming changes in traffic access and flow within the Western Variant." (*Ken Maley, Individual, Email, April 15, 2019, [I-Maley-1])*

RESPONSE ME-3

The comments express concern about the impacts of the proposed project on businesses in the vicinity of the project corridor, including those which could occur as a result of changes to traffic circulation patterns.

An economic effect by itself shall not be considered a significant effect on the environment unless it is related to a physical change that is significant. As stated Draft EIR Section 1, *Introduction*, p. 1-7, section 15131 of the CEQA Guidelines specifies that "the intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." The

issues raised in these comments relate to economic and business impacts which would not in turn result in physical environmental impacts, therefore this is not a CEQA issue and this response is provided for informational purposes.

The first three comments in this comment grouping provide general concerns that the proposed project would harm local businesses, but do not raise any specific concerns. The fourth comment includes a summary of circulation changes that would result from implementation of the Western Variant. While the Western Variant would include additional private vehicle restrictions on Market Street between Van Ness Avenue and Octavia Boulevard, as shown in Figure 2-10 on Draft EIR p. 2-81, both the proposed project and Western Variant would maintain vehicle access to Franklin/12th streets from eastbound Market Street and from Page/12th streets to westbound Market Street. Therefore, access to and from these streets would remain similar to existing conditions. In response to this comment, Figure 2-10 has been revised to clarify that a U-turn is allowed for eastbound vehicles at Franklin Street. The revised figure is included in RTC Chapter 5, *Draft EIR Revisions*.

The commenter's summary of the circulation changes due to the additional vehicle access restrictions for the Western Variant are only partially correct.

- It is correct that the Western Variant would restrict right turns from southbound Van Ness Avenue onto westbound Market Street. The commenter is incorrect about specific rerouting being implemented. Although specific rerouting would not be implemented as part of the proposed project, as discussed in the Draft EIR on p. 4.B-60, it is likely that drivers on Market Street who would otherwise be headed west of Gough Street would divert to southbound Gough Street and then turn right onto westbound Market Street. The Draft EIR does not state that drivers on southbound Gough Street would be directed to turn onto left turn lanes onto Page Street, where they would then turn right onto Market Street at Franklin Street.
- The commenter's assertion that westbound traffic would be diverted at Hayes Street and not allowed to continue westbound beyond this intersection is partially correct. As stated on Draft EIR p. 4.B-59, the Western Variant would extend the proposed private vehicle restrictions on westbound Market Street from Van Ness Avenue to 12th Street, however, taxis and paratransit vehicles would be allowed to continue westbound on Market Street.
- The commenter is correct in stating that the existing left turn lanes from eastbound Market Street onto northbound Franklin Street would not be affected.
- The commenter's assertion that existing eastbound traffic would be rerouted to southbound 12th Street under the proposed project is partially correct. On eastbound Market Street, all eastbound vehicles on Market Street east of Gough Street, besides Muni, emergency vehicles, paratransit vehicles, and taxis, would be required to turn

right onto 12th Street, which is a one-block local street between Market Street and South Van Ness Avenue/Otis Street. This would be the final opportunity for private vehicles on eastbound Market Street to comply with the proposed private vehicle restrictions to the east. However, the result of these eastbound Market Street restrictions would be that private vehicles using Market Street to reach Valencia Street or 10th Street would most likely instead shift to Gough Street, Duboce Avenue, and 14th Street upstream of the intersection of Van Ness Avenue/South Van Ness Avenue/Market Street (rather than rerouted to southbound 12th Street as stated in the comment).

While the Western Variant would include additional restrictions as described above, vehicular access to buildings in the affected segment would continue to be maintained via north-south streets and other east-west streets adjacent to Market Street. The proposed project and Western Variant include new commercial and passenger loading spaces on cross and side streets along the Market Street project corridor to accommodate existing and proposed uses, including ground floor retail uses.

For example, between Octavia Boulevard and Van Ness Avenue/South Van Ness Avenue, the proposed project would convert 33 vehicle parking spaces on cross and side streets to commercial loading spaces (15 spaces north of Market Street and 18 spaces south of Market Street). These spaces would support existing businesses such as Zuni Café on Market Street at Page Street, as well as new developments along this segment of the project corridor at 1699 Market Street (under construction), 1629 Market Street, 1546-1564 Market Street, 10 South Van Ness Avenue, and 1500 Mission Street.

Although economic and business impacts are not a CEQA issue, one mitigation measure presented in the Draft EIR includes some features that would help support businesses during construction. As discussed in Draft EIR Section 4.B, *Transportation and Circulation*, Mitigation Measure M-TR-1, Construction Management Plan – Additional Measures, p. 4.B-51, would be implemented to minimize significant construction-related transportation impacts, however, because project construction would still require travel lane closures, sidewalk closures, and detours for transit, bicyclists, and people walking over a prolonged period, substantial disruption to transportation would continue to occur. As part of Mitigation Measure M-TR-1, the project sponsor would conduct construction coordination with adjacent businesses, which may include procedures developed with the Office of Economic and Workforce Development. The proposed outreach and engagement efforts would include the project website, Public Information Officer and ongoing communication support, and Business Impact Brochure describing possible impacts of upcoming project and resources available.

No changes to the Draft EIR are required in response to these comments.

COMMENT ME-4: SUPPORT FOR THE WESTERN VARIANT

- I-Nick-1
- O-SFBC1-4
- O-SFBC2-3
- O-WSF1-5

"Evidence shows that protected bicycle facilities induce mode shift to biking (e.g., https://www.tandfonline.com/doi/abs/10.1080/15568318.2016.1249443) and a resulting drop in VMT/emissions. This shift has been found to be related to the improved perception of safety. The proposed project includes a significant increase in protected biking facilities, however, any proposed protection drops for inbound bicyclists at one of the busiest and largest intersections in the project area – Market and Van Ness. The proposed design is no different than existing conditions, with bicyclists and motorists forced to move across each others' path of travel at speed across a wide intersection. As both real and perceived danger to bicyclists corresponds directly to vehicle speeds and exposure to vehicles, this is an inherently unsafe design. The real and perceived safety of a bicycle facility is only as strong as its "weakest link", so the proposed unprotected project design at Market and Van Ness will reduce the amount of mode shift to biking when compared with the Western Variant.

The Western Variant would provide a far greater degree of protection as well as real and perceived safety. It would, therefore, result in increased mode shift when compared with the proposed project alone. The EIR should note this potential for increased mode shift, as well as the VMT reduction, emissions reduction, congestion reduction, and safety improvements that would be associated with that mode shift." (*Nick Smith, Individual, Email, April 9, 2019 [I-Nick-1])*

"I do want to echo Cathy's support for the Western Variant. This project's proposal could go farther for bicycle safety by including elements of that in the proposed project. So, strengthen vehicle restrictions, additional blocks of raised bike lanes, those would all support the goal of the project to create a continuous, protected and safe bicycle route through the corridor of our city. The entirety of this project, including the Western Variant, is a part of the Market Street high-injury corridor, so it is only fair to create safety for all users throughout the entire project" (*Charles Deffarges, San Francisco Bicycle Coalition, Draft EIR Hearing Transcript, April 4, 2019 [O-SFBC1-4])*

"Finally, the additional private vehicle restrictions proposed in the Western Variant would increase safety for people walking and biking along this crucial segment of Market." *(Charles*

Deffarges, Senior Community Organizer, San Francisco Bicycle Coalition, Letter, April 12, 2019 [O-SFBC2-3])

"And I mentioned we do support the Western Variant, but that variant is going to repeat that two-stage turn at Hayes and Larkin, so urge you to see if there's a way to close that up as well like the proposed project has" (*Cathy Deluca, Policy and Program Director, Walk San Francisco, Draft EIR Hearing Transcript, April 4, 2019 [O-WSF1-5)*

RESPONSE ME-4

The comments express support for the Western Variant, while other comments request additional discussion in the Draft EIR related to increased mode shift when compared to the proposed project alone. One comment requests that at the intersection of Market Street with Larkin and Hayes streets, the Western Variant include the same sidewalk and crosswalk changes included in the proposed project.

The comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

Comments supporting the Western Variant, which would seek additional improvements beyond those of the proposed project related to pedestrians and bicycle safety, comfort and mobility through additional reductions between different modes of transportation on Market Street generally between Octavia Boulevard and Hayes Street, are noted. Modeling of the proposed project, as presented in the Draft EIR, did not identify a noticeable change in travel modes along the Market Street project corridor. Therefore, any shift in persons choosing walking or bicycling, rather than driving or taking transit as a result of the additional transportation network changes included as part of the Western Variant would be minor. As noted on Draft EIR Section 4.B, *Transportation and Circulation*, p. 4.B-53, the quantitative analysis of changes to vehicular travel on transportation study area streets without and with the proposed project determined that total VMT within the study area would not substantially change with implementation of the proposed project. Therefore, it is not anticipated that the additional changes within the 0.6-mile segment of the Western Variant would substantially affect VMT, congestion levels, and safety beyond that discussed in the Draft EIR. No additional discussion or analysis related to mode shift for the Western Variant is needed.

One comment indicated that the Western Variant should include the same sidewalk and crosswalk changes at the intersection of Market Street with Hayes and Larkin streets as the proposed project. The Western Variant would extend the proposed private vehicle restrictions. Only Muni, paratransit vehicles, taxis, and emergency vehicles would be allowed to continue westbound on Market Street west of the intersection of Market Street with Hayes/Larkin streets.

Therefore, the design of the Western Variant includes a channelized right turn lane to direct non-permitted vehicles from Market Street onto Hayes or Larkin streets, as shown in Draft EIR Chapter 2, *Project Description*, Figure 2-9 on p. 2-79. This channelization was included as part of the Western Variant as it would self-enforce vehicles not permitted within the Muni-only lanes to exit Market Street. While this design would not allow for the expansion of sidewalks on Larkin Street and shorter pedestrian crossings, it would remove vehicles turning onto Hayes Street westbound or Larkin Street northbound from turning across the crosswalk across the terminus of Hayes and Larkin streets. The two-stage crosswalks noted by the commenter would be signalized, and no vehicles would turn across the crosswalk while pedestrians are crossing.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-5: OPPOSITION TO THE WESTERN VARIANT

- I-Flores2-2

"My biggest concern is the proposed variant to extend the ban to Octavia street. I feel this will create a sever hardship when driving down Gough from my daughters school to our home. Second, I feel the main purpose is to accommodate the SF Bicycle coalitions desire to have the car free path go right in front of their office. Please take into consideration that families with children have many obstacles when raising our children in the city. Unfortunately, we are not able to take our 3 children to school on a bike or bus. It seems San Francisco is not just reducing lanes they are restricting access. Yet, our auto tag fees are going to fund the reduction of access to the roads. Please reconsider these proposals overall and do not allow the ban to extend to Octavia Blvd." (*Lawrence Flores, Individual, Proactive Network Consulting, Email, April 10, 2019, [I-Flores2-2])*

RESPONSE ME-5

This comment expresses opposition to the Western Variant, suggesting that the Western Variant would create a hardship for some drivers. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to this comment.

As noted in Draft EIR Chapter 2, *Project Description*, on p. 2-78, the Western Variant would restrict access to Market Street for all westbound (outbound) private vehicles between Hayes Street and 12th Street. Although the Western Variant would restrict access for a longer portion

of Market Street compared to the proposed project, it would not extend the proposed private vehicle access restrictions to Octavia Boulevard, as suggested in the comments.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-6: OPPOSITION TO PRIVATE VEHICLE RESTRICTIONS

- I-Flores1-1
- I-Flores2-1
- I-Folsom-2
- I-Katz-5
- I-Katz-8
- I-Reinhard-1
- I-Walsh-1
- I-Wright-1

"Hello. Good afternoon, my name is Lawrence Flores. Hello, Commissioners. So, I work in the city, I have a business downtown. I have family. My kids go to school here. These types of projects are great for making the roads safer, but I would just like you guys to keep in mind that there are still families here and we have to get down to the high schools, and we have to get around because the schools are scattered all over. So, I just want to be here to say don't forget about us that have to get to work, get our kids to school, and we can't use bike lanes for that. We have to transport them because the schools are scattered all over the place, so please take that into consideration. Thank you." (*Lawrence Flores, Individual, Draft EIR Hearing Transcript, April 4, 2019 [I-Flores1-1])*

"I am writing to express my opposition to removing private automobiles on Market Street. I am a San Francisco resident, business owner in downtown financial district and have school aged children. I use Market street to get home to Noe Valley where I have lived for 20 years." (*Lawrence Flores, Individual, Proactive Network Consulting, Email, April 10, 2019 [I-Flores2-1])*

"My only reasonable transportation is by car. The continual pressure on car drivers these days makes it harder and harder for me to get around the city that I have loved for decades, and especially to get to church. I fear that the City's plan does not care much about the elderly and

disabled. Ironic, since as a social worker, I worked with the elderly for 22 years" (*Bruce Folsom, Individual, Email, March 14, 2019 [I-Folsom-2])*

"**UNFOUNDED RESTRICTIONS ON ACCESS TO MAIN STREET**

The proposed project would impose extremely complex and confusing private-vehicle restrictions, by direction. Underlying the complexity, private cars would basically be banned from San Francisco's main street.

There's no rationale for these vehicle restrictions. You are preserving the same count of vehicle lanes, while (laudably) proposing that bike lanes move toward sidewalk level. If you're shielding cyclists from cars (and getting us away from hazardous streetcar tracks), why is there any need to restrict, let alone ban, vehicle access?" (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-5])*

"I heard you are considering closing market street to traffic all the way to Octavia Street? That would make entry onto Franklin or from Gough impossible and a major blockage of needed vehicle access to the civic center area and of course across town all the way to the north and from Van Ness. This is a bad proposal. There are few or no options to effectively transverse the city if that proposal moves forward. It would produce major vehicle snarls elsewhere on streets that could not accommodate. Please reject that option entirely." *(Robert Reinhard, Individual, Email, April 10, 2019 [I-Reinhard-1])*

"The proposed project's basic bad idea – restricting private-vehicle access to San Francisco's principal street – is motivated by the tiny-minded, unfounded notion that icky cars must be removed from Market St. for the alleged benefit of saintly cyclists.

Here's the flaw in this notion, from my perspective as a daily bicycle commuter: Even if you removed every car from Market St. – including taxis – I'd still far prefer to bike on any parallel street. And so would any other sensible, intelligent cyclist. Senseless or stupid cyclists don't count – and Market St. should not be distorted on their behalf." (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-8])*

"I am a San Francisco native and I vote.

I think it is a bad idea to restrict cars as this idea does." (*Thomas B. Walsh, Individual, Email, March 13, 2019 [I-Walsh-1])*

"Thank you for the information about the City's plan to make changes on Market Street.

My office faces Market Street. All day long I see people getting dropped off or picked up at the Hotel Whitcomb across the street or downstairs from me at Fermentation Lab, a very popular beer-oriented restaurant. Banning all private vehicles will give taxi drivers a tiny boost (too little, too late) and it will screw up all the little business along the street. Hotel guests will need to schlep their baggage half a block to get to the front door. " (*David S. Wright, Attorney at Law, Individual, Email, April 1, 2019 [I-Wright-1])*

RESPONSE ME-6

The comments question the need for, or state opposition to, the restriction of private vehicles along the project corridor as a result of implementation of the proposed project.

Vehicle delay, by itself, is not a CEQA issue, as described in Section 4.B, *Transportation and Circulation*, on p. 4.B-29. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

As noted in Draft EIR Chapter 2, *Project Description*, on p. 2-2, a basic objective of the proposed project is to "reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible." Restrictions on private vehicles in the project corridor are important mechanisms for reducing congestion and improving transit travel speeds on Market Street. Furthermore, as demonstrated by the Safer Market Street project, described in Draft EIR Chapter 4, *Environmental Setting and Impacts*, p. 4-6, private vehicle restrictions are effective at addressing the safety of pedestrian and bicyclists by reducing conflicts between travel modes.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-7: TRANSPORTATION NETWORK COMPANIES AND TAXI ACCESS

- I-Chetan-1
- I-Esher-1
- I-Gibson-1
- I-Pearce-1
- I-Vedock-1

"Please make market street more bike friendly.

Maybe you should make the market street only accessible to public transit, pedestrians and bikes only." (*M. Chetan, Individual, Email, March 19, 2019 [I-Chetan-1])*

"I am currently 71 and I think not allowing ride hailing services like Uber and Lyft is a mistake and a disservice to seniors mostly. There actually are events on Market Street I like to attend. And I am on a limited income these days so getting to those events in the evening needs to be cost effective and still safe. While I can take the bus or Bart to get where I want to go (the cost effective part), I do NOT want to take public transportation (the safety part) to get home, so I rely on Lyft and Uber for that. I do not rely on Yellow Cab or the like because in the past they have not been reliable and are expensive. Or at least they used to be.

That is my main concern. I do think the transit first and bike friendly options are not considering seniors in general as we lose our abilities and hopping on a bike is not always an option.

Anyway, that is my $.02. In a way, I wish seniors could drive where younger people cannot as we are safer when driving. Because… we will not get beat up." (*Susan Esher, Individual, Email, March 12, 2019 [I-Esher-1])*

"Why are taxis allowed on Market and not ride share cars? Seems discriminatory." (*Joe Gibson, Individual, Email, March 13, 2019 [I-Gibson-1])*

"As the ride hailing market has transformed the taxi industry and reduced it to near obscurity, it doesn't make sense to continue to plan for exceptions for taxis in plans as big as this. BMS should be encouraging walking, biking, and public transit exclusively to increase safety and help manage enforcement of this zone" (*Mike Pearce, Individual, Email, March 12, 2019 [I-Pearce-1])*

"Great idea...but why do taxis get onto the street and not rideshare? I use and trust them way more then taxis." (*Tod Vedock, Individual, Email, March 14, 2019 [I-Vedock-1])*

RESPONSE ME-7

These comments express opposition to allowing taxi access on the project corridor, and question why taxis would be allowed in the project corridor but not transportation network company vehicles.

These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

As noted in Draft EIR Chapter 2, *Project Description*, p. 2-2, a basic objective of the proposed project is to "reduce conflicts between transit, taxis, paratransit, commercial vehicles, private vehicles, bicyclists, and pedestrians to the extent feasible." As described in Draft EIR Chapter 2, *Project Description*, p. 2-46, "transportation network company vehicles (e.g., Uber and Lyft) are considered private vehicles and thus... restricted from the above segments of Market Street." Taxis would be allowed in the project corridor as part of SFMTA's city-wide Transit-First Policy (San Francisco Charter Article VIIIA: The Municipal Transportation Agency Section 8A.155).[32] Per the SFMTA's Transit-First Policy Section 8A.115 (a)(2), public transit, including taxis and vanpools, is an economically and environmentally sound alternative to transportation by individual automobiles.

In addition, taxis are part of SFMTA's paratransit program, "San Francisco Paratransit" or "SF Paratransit", which is a van and taxi program for people unable to independently use or access public transit because of disability or disabling health condition. SF Paratransit provides two services – the SF Access Service and the SF Taxi and Ramp Taxi Service. The SF Access Service (which is designed to meet ADA paratransit requirements) provides door-to-door, shared-ride van services for people who are unable to use Muni's accessible buses, trains, and streetcars some or all of the time because of their disability. The SF Taxi and Ramp Taxi Service (which is not an ADA paratransit service because in some cases it does not meet minimum ADA requirements) serves to augment the SF Access Service in that it is similar to ADA paratransit service and may satisfy the transportation needs of many ADA-certified riders who may find that it better meets their transportations needs in that it provides a direct route to the destination, same day scheduling, and subsidized fares.[33]

Taxis are regulated by the SFMTA; therefore, the SFMTA can regulate their compliance with the proposed project's goals and objectives as well as general public safety, economic and environmental sustainability, and accessibility.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

[32] https://www.sfmta.com/transit-first-policy

[33] https://www.sfparatransit.com/

COMMENT ME-8: TRANSIT STOP SPACING

- A-SFPC-2
- I-Natvig-7

"The point that Mr. Miguel made, I think, is extremely important, to look at the spacing of boarding islands because for many people, particularly elderly or movement impaired people, taking one or two stops, and then going back or strolling or going back to retail destinations is a part of how you move down Market Street.

So by having a reasonable rhythm, which is a comfortable walking distance, whichever way you define that, is one way to measure of how these islands are properly spaced. I do believe there is a great opportunity and Mr. Haas pointed it out." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript, April 4, 2019 [A-SFPC-2])*

" - - - The longer stop spacing increases the average walking time to the islands which further cancels the total travel savings for limited stop service." (*Carl Natvig, Individual, Letter, April 15, 2019 [I-Natvig-7]*

RESPONSE ME-8

These comments concern the spacing between boarding islands and the implications for increased walking distance where boarding islands are spaced further apart. A change in walking distance, by itself, is not a CEQA issue, and these comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. In addition, please refer to Response TR-3, Transit Impacts, for a description of how transit riders could use local routes to transfer to routes that serve center boarding islands at shared or adjacent stops, even though increased stop spacing could increase the physical effort required to reach a particular transit stop. No changes to the Draft EIR are required in response to these comments.

As acknowledged in Draft EIR Chapter 2, *Project Description*, p. 2-17, under existing conditions, the center boarding islands within the project corridor do not meet current ADA standards, and most do not include wheelchair ramps that are compatible with both buses and F-Line streetcar vehicles. As described in Draft EIR Chapter 2, *Project Description*, p. 2-55, the proposed project would include center boarding islands that would be widened and lengthened, relative to existing stops, to meet ADA standards to facilitate accessible loading and unloading of passengers from buses and streetcars. Some existing center transit boarding islands would be

removed or relocated, which may increase the distance between some transit stops and therefore increase the distance some individuals may need to walk to make transit connections.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

COMMENT ME-9: RETENTION OF MATERIALS

- A-HPC-2
- A-SFPC-5
- I-Cauthen-3
- I-Katz-6

"The HPC had the following comments on retention of materials:

- The HPC emphasized the need to retain the granite curbs and confirmed the project and the preservation alternatives include the retention of the curbs as feasible. Commissioner Johnck endorsed retention of the curbs after expressing concern over the use of the word "feasible" in the project description and the alternatives.
- The HPC commented on the importance of the brick to Market Street's identity. Commissioner Johnck noted the brick is a defining feature of Market Street. Commissioner Black noted the brick is a placemaking feature of Market Street that creates its identity
- Commissioners Black, Pearlman and Wolfram suggested that elements of the landscape, such as sections of brick or trees, be retained or incorporated into the design. Commissioner Black expressed she would like to see as much of Lawrence Halprin's plan preserved as possible
- Commissioner Pearlman supported the mix of trees included in the proposal after confirming the project description had not changed from the introduction of a number of species to maintaining the current monoculture.
- The HPC expressed that the new paving materials should be a material high in quality as the existing brick and compatible with the Market Street Cultural Landscape District and the entirety of Market Street. Commissioner Hyland recommended against a plain grey cement." (*Aaron Hyland, President, Historic Preservation Commission, San Francisco Planning Department, April 2, 2019 {A-HPC-2])*

"I would agree with the thoughtful comments made by historic preservation retention of materials, strong support for the retention of Granite Curbs, Granite Curbs with a capital G, with a capital C. The diminished look of Granite Curbs in San Francisco creates serious maintenance issues over the long haul.

I've lived on streets where the granite curbs disappeared, and I strongly hope we will maintain that as a major commitment to quality. And quality is what I also hope will be addressed in more detail in this example when it comes to complementing materials. Complementing materials are not only artificial materials, artificially made materials, but also natural materials. And I hope we step up to really do what needs to be done to revitalize this civic corridor.

The Historic Preservation Commission -- and, again, I appreciate that we got this ahead of time -- spoke about the importance of brick as a market identity. While that may not be an idea in today's standards, there should be some recall somewhere. And I don't know what that is, but it should be the path of gold light standards, in the alignment, in the visibility, in the refurbishing, I think are very important." (*Commissioner Moore, Coalition, Draft EIR Hearing Transcript, April 4, 2019 [A-SFPC-5])*

"The brick sidewalks on Market add a lot of class and should be maintained and protected." (*G. Cauthen, Individual, Email, March 21, 2019 [I-Cauthen-3])*

"Why would you replace Market St.'s signature, vintage red-brick sidewalks with ugly, urban-redevelopment gray? Dragging Market St. back to its seedy 1970s low point, before the bricks were installed? This is horribly misguided planning for bureaucrats, not for people." (*Michael Katz, Individual, Email, April 4, 2019, [I-Katz-6])*

RESPONSE ME-9

The comments suggest the retention of specific materials that are associated with the Market Street corridor, including the red brick pavers, the granite curbs, street trees, and other design components associated with Lawrence Halprin's Market Street Redevelopment Plan. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are required in response to these comments.

In Draft EIR Chapter 2, *Project Description*, under an overview of the Project Background on p. 2-6, it is stated that the proposed project was developed through the careful consideration of design drivers (or key goals) and priorities within the city. These key goals and priorities

include, but are not limited to, decreased travel times, and improving bicyclist and pedestrian circulation and safety. An extensive public outreach process began in 2011, and has helped the project sponsor, SFMTA, and the planning department identify the design drivers and City priorities. The proposed project's materials palette was selected to align with identified design drivers and to confirm with current standards for traction and accessibility consistent with Public Works Order 200369 in Draft EIR Appendix 3, the California Building Code, and the Mayor's Office on Disability. Existing streetscape materials in the project corridor were evaluated for consistency with project goals and priorities, and were identified for retention, replacement, or removal. A discussion of each of the categories of features identified in the comments is provided below.

Brick Sidewalks. The current brick sidewalks do not meet current standards for ADA accessibility; therefore, the project proposes to replace them throughout the project corridor. A key objective of the project is to make the sidewalks accessible to users by providing new sidewalk surfaces that meet current City standards for traction, are free of jointed surfaces, and are as visually uniform as possible. Draft EIR Chapter 2, *Project Description*, Section F, Project Characteristics, p. 2-21, describes proposed treatments for sidewalks, which require new sidewalk surfaces to meet current standards for traction and accessibility, consistent with Public Works Order 200369 in Draft EIR Appendix 3, the California Building Code, and the Mayor's Office on Disability.

Public Works Order 200369 provides specificity on a number of surfacing considerations, including shape, pattern, and color tone to enable consistency with federal and local accessibility requirements. The Public Works Order allows a number of different color tones of pavers and color-integrated concrete. Colors have not been selected at the current level of design for the proposed project, but the preference for a color different than gray is noted and will be conveyed to the project sponsor.

Granite Curbs. The granite curbs adjacent to United Nations Plaza are a contributing feature of the Civic Center Landmark District. As discussed under the Impacts Analysis in Draft EIR Section 4.A, *Cultural Resources*, regarding United Nations Plaza on p. 4.A-61 and Civic Center Landmark District on p. 4.A-74, a small segment of the granite curb would need to be removed in order to accommodate the installation of a corner curb ramp at Market Street and Charles Brenham Place. However, the intention of the project sponsor is to retain as much as the granite curbs as feasible. The project is still in design phase, but at this time it is estimated that approximately 20 percent of the existing granite curb on Market Street is 12 inches wide and in straight enough pieces so that it could potentially be reused. The remainder of the materials are anticipated to be damaged during removal, rendering it unusable. The project sponsor would perform a trial run for granite curb removal on a pilot project site. Where re-use of the granite curb is infeasible, and on curves, the project would use new granite curb of similar color. Both

the replaced and reinstalled curbs would continue to convey the materiality and design of those currently in place.

Lawrence Halprin's Market Street Redevelopment Plan. For low-vision and mobility-impaired pedestrians, existing brick sidewalks present additional challenges because they do not meet current City standards for compliance ADA standards for slip resistance, surface smoothness, and surface visual uniformity, as discussed in Draft EIR Chapter 2, *Project Description*, p. 2-5. The red bricks are a key component of Lawrence Halprin's 1979 redevelopment plan for Market Street and are a character-defining feature of the Market Street Cultural Landscape District identified in Draft EIR Appendix 6-3. As such, the removal of the red brick was analyzed in detail in the Impacts Analysis in Draft EIR Section 4.A, *Cultural Resources*, p. 4.A-55, and in the analysis of all three Preservation Alternatives presented in Draft EIR Chapter 6, *Alternatives*, p. 6-7. As described in the Cultural Resources section, the proposed project would have significant and unavoidable impacts on the Market Street Cultural Landscape District, due in part to the removal of the red brick pavers in combination with the loss of other character-defining features of the district. The project sponsor would select replacement pavers for the pedestrian through zones within the project corridor from the options included in Draft EIR Appendix 3, entitled Standard Paving Materials in San Francisco's Public Rights-of-Way (Public Works Order 200369). Public Works adopted these standards in January 2019 and the standards are ADA-compliant.

Some of the other character-defining features of Lawrence Halprin's 1979 Market Street Redevelopment Plan would be retained in place or restored as part of the proposed project, including the street alignment as well as the small plazas and monuments. Details on which features would be retained, altered, and removed are included in Draft EIR Section 4.A, *Cultural Resources*.

Street Trees. Both the species and arrangement of trees within the existing Market Street streetscape are character-defining features of Lawrence Halprin's 1979 Market Street Redevelopment Plan. As such, the proposed project's treatment of the street trees is analyzed in detail in Draft EIR Section 4.A, *Cultural Resources*, p. 4.A-58. The proposed project would include removal of the London plane trees (*Platanus acerifolia*), because they have experienced an approximately 60 percent mortality rate. The proposed project would install replacement trees in a variety of alternative species. As described in Draft EIR Section 4.A, *Cultural Resources*, the proposed project would have significant and unavoidable impacts on the Market Street Cultural Landscape District, due in part to the removal and replacement of the street trees in combination with the loss of other character-defining features of the district.

These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and Western Variant.

5. DRAFT EIR REVISIONS

This chapter presents text changes for the Better Market Street Project Draft EIR initiated by the planning department. Some of these are staff-initiated text changes that add minor information or clarification related to the description of the proposed project, some correct minor inconsistencies and errors in the impact analysis sections of the Draft EIR, and others are from the responses in RTC Chapter 4, *Comments and Responses*. Staff-initiated text changes are highlighted with an asterisk (*) in the margin to distinguish them from text changes in response to comments. Staff-initiated text changes pertaining to the description of the proposed project and the list of cumulative projects are also identified in RTC Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*, but have been repeated here to provide all the changes to the Draft EIR in one location. Revisions to Draft EIR Chapter 2, *Project Description*, and relevant environmental impact analyses and mitigation measures are presented in this chapter (new text is double-underlined and deletions are shown in ~~strikethrough~~). The text revisions clarify, expand, or update the information presented in the Draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR or any substantial increase in the severity of an impact identified in the EIR or the initial study prepared for the project, and therefore, recirculation of the EIR is not required.

As described in RTC Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*, the project sponsor (San Francisco Public Works [Public Works]) has initiated revisions to the proposed project that would expand the project corridor approximately 155 feet south on 11th Street to accommodate a new eastbound (inbound) Muni transit stop and center transit boarding island. The project sponsor has initiated similar revisions to the Western Variant. RTC Chapter 2 includes other revisions and clarifications to the proposed project. Because the revised proposed project would replace the proposed project and include the revisions introduced and analyzed in RTC Chapter 2, *Project Description and Mitigation Measure Revisions, and the Revised Proposed Project and Mitigation Measure Analysis*, the changed proposed project is referred to interchangeably throughout this chapter as either the "revised proposed project," or simply, the "proposed project."

SUMMARY

The impact statement on Draft EIR p. S-3 has been revised as follows:

- 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

~~and~~ accessibility to adjoining areas, and ~~could result in~~ potentially hazardous conditions.

* The first bullet in Mitigation Measure M-CP-1b in Table S-1 on Draft EIR p. S-17 has been revised as follows:

> 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.

The impact statement on Draft EIR p. S-25 in Table S-1 has been revised as follows:

> **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 ~~and~~ accessibility to adjoining areas, and ~~could result in~~ potentially hazardous conditions.

* The first bullet in Mitigation Measure M-TR-1 in Table S-1 on Draft EIR p. S-25 has been revised as follows:

> *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, which would permit only public transit, taxis, and commercial vehicles on Mission Street in the eastbound and/or westbound directions, could be implemented under the following conditions: (1) at least one travel lane is closed on Mission Street between 11th and Steuart streets, resulting in only one open lane in either the eastbound or westbound direction, or (2) construction activity on Market Street in the project corridor restricts transit operations. If implemented because of 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.

* The second bullet in Mitigation Measure M-TR-1 in Table S-1 on Draft EIR p. S-26 has been revised as follows:

Active Monitoring of Detours – When detours for transit, other vehicles, and/or people walking and bicycling are implemented, SFMTA shall require that police officers or parking control officers ~~shall~~ monitor critical locations along the detour to promote unobstructed travel by vehicular traffic, transit, and people walking and bicycling.

* The third bullet in Mitigation Measure M-TR-1 in Table S-1 on Draft EIR p. S-26 has been revised as follows:

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.

* The fourth bullet in Mitigation Measure M-TR-1 in Table S-1 on Draft EIR p. S-26 has been revised as follows:

Emergency Access Response Plan – The construction contractor(s) shall 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.

* The seventh bullet in Mitigation Measure M-TR-1 in Table S-1 on Draft EIR p. S-28 has been revised as follows:

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~~neighbors~~, as well as contact information for specific construction inquiries or concerns.

* The first paragraph in Mitigation Measure M-NO-1 in Table S-1 on Draft EIR p. S-32 has been revised as follows:

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 fourth bullet in Mitigation Measure M-NO-1 in Table S-1 on Draft EIR p. S-33 has been revised as follows:

o Prohibit ~~I~~idling of inactive construction equipment for prolonged periods ~~shall be prohibited~~ (i.e., more than 2 minutes).

* The sixth bullet in Mitigation Measure M-NO-1 in Table S-1 on Draft EIR p. S-33 has been revised as follows:

o 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.

* The eleventh bullet in Mitigation Measure M-NO-1 in Table S-1 on Draft EIR p. S-34 has been revised as follows:

> 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.

* The first paragraph in Mitigation Measure M-NO-3 in Table S-1 on Draft EIR p. S-36 has been revised as follows:

> **Mitigation Measure M-NO-3: Nighttime Construction Vibration Control Measures – Annoyance** Prior to issuance of a construction permit, a detailed pre-construction 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 impact statement on Draft EIR p. S-45 in Table S-2 has been revised as follows:

> 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 ~~and~~ accessibility to adjoining areas, and ~~as well as~~ potentially hazardous conditions. (SUM)

CHAPTER 2, PROJECT DESCRIPTION

* The following figures have been revised to show the revised project corridor boundary; the revised figures are provided at the end of this chapter:

  - Figure 2-1 on Draft EIR p. 2-3

- Figure 2-2 on Draft EIR p. 2-15
- Figure 2-3 on Draft EIR pp. 2-23 through 2-41
- Figure 2-5 on Draft EIR p. 2-47
- Figure 2-6 on Draft EIR p. 2-53
- Figure 2-7 on Draft EIR p. 2-57
- Figure 2-8 on Draft EIR p. 2-67
- Figure 2-9 on Draft EIR p. 2-79
- Figure 2-10 on Draft EIR p. 2-81

* Figure 2-3 has been revised to clarify some aspects of the proposed project features.

* Figure 2-6 has been revised to clarify the proposed transit service concept under consideration by SFMTA.

* Figure 2-9 has been revised to clarify some aspects of the proposed variant features.

Footnote 4 on Draft EIR p. 2-5 has been revised as follows:

> [4] *Better Market Street – Existing Conditions and Best Practices*, Part 1: Existing Conditions, Section 2.8, Safety, December 7, 2011~~; Trout, I. (personal communication)~~.

Footnote 5 on Draft EIR p. 2-6 has been revised as follows:

> [5] San Francisco County Transportation Authority, *Market Street Action Plan*, February 24, 2004, ~~*http://www.sfcta.org/transportation-planning-and-studies/current-research-and-other-projectsstudies/market-street-studies*~~ *https://archive.sfcta.org/sites/default/files/content/Planning/MarketStreet/action%20plan.pdf*, accessed June 1, 2015. This document (and all other documents cited in this report, unless otherwise noted) is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2014.0012E.

Footnote 8 on Draft EIR p. 2-11 has been revised as follows:

> [8] Perkins + Will, *Better Market Street Existing Conditions & Best Practices*, December 7, 2011**4**. Available: http://www.bettermarketstreetsf.org/about-reports-existing-conditions.html. Accessed: May 1, 2018.

* The third paragraph on Draft EIR p. 2-19 has been revised as follows:

> As shown in Figure 2-8, p. 2-67, Market Street has a limited number of designated on-street commercial and passenger loading bays, some with or near curb cuts. Within the project corridor, there are 23 existing loading bays on Market Street between Steuart Street and Octavia Boulevard, 20 of which are for commercial loading only; three are for a mix of passenger and commercial loading. Commercial loading bays on Market Street are restricted to commercial vehicles with six wheels or more. They have a 30-minute time limit but are unmetered. Paratransit vehicles may use all loading bays along Market Street. In current practice, paratransit vehicles load from the bicycle and travel lanes along much of Market Street. The length of the existing loading bays ranges between 40 and 173 feet. There are 11 bays on the north side of the street and 12 bays on the south side of the street. On-street commercial loading spaces are also provided on streets north and south of Market Street to allow commercial vehicles (typically trucks and service vehicles) to park along the curb to unload or load goods. In addition, there is one loading bay on the west side of Valencia Street. Furthermore, there are three loading spaces on the east side of 11th Street.

* The first and second paragraphs on Draft EIR p. 2-20 have been revised as follows:

> Existing on-street parking is not permitted on Market Street east of Octavia Boulevard, with the exception of six metered parking spaces on the north side of Market Street between Steuart and Spear streets. Existing on-street metered parking is available on adjacent cross streets.
>
> Existing on-street parking is available on both sides of the segment of Valencia Street between Market and McCoppin streets. Twelve existing motorcycle parking spaces are available on the east side of 11th Street.

* The first paragraph on Draft EIR p. 2-46 has been revised as follows:

> The proposed project would restrict all private vehicle access to Market Street along most of the project corridor between Steuart Street and Van Ness Avenue westbound (outbound) and between 10th and Main streets eastbound (inbound). Transportation network company vehicles (e.g., Uber and Lyft) are considered private vehicles and thus would be restricted from the above segments of Market Street. Taxis and commercial vehicles (see commercial and passenger loading discussion below for restrictions) would be permitted on the entire length of Market Street within the project corridor, except for eastbound (inbound) between Beale and Main streets. Existing required right-turn and left-turn regulations on Market Street would remain. Private vehicle access and turn restrictions would be implemented together across the entire corridor at the same time and implemented before construction of the infrastructure improvements.

* The third paragraph on Draft EIR p. 2-49 has been revised as follows:

> **Fifth Street to Eighth Street.** The following one-way streets would be converted to two-way streets: Jones Street between McAllister Street and Golden Gate Avenue, Turk Street between Taylor and Market streets, and Mason Street between Market and Eddy streets. The project would prohibit turns onto Market Street from McAllister/Jones streets, adding to existing turn prohibitions onto Market Street from Seventh Street, Golden Gate Avenue/Sixth Street, and Mason Street. Right turns would continue to be required for private vehicles on eastbound (inbound) Market Street at Sixth Street. The project would force right turns from southbound Jones Street onto McAllister Street, adding to the existing forced right turn onto Turk Street from southbound Mason Street. In addition, all vehicles, except Muni buses and bicycles, would be required to turn left from eastbound~~left turns would be required at~~ McAllister Street onto northbound Jones Street~~and at Turk Street~~. Muni buses and bicycles would be permitted to continue from eastbound McAllister Street onto Market Street.

* The third paragraph on Draft EIR p. 2-51 has been revised as follows:

> **Muni-Only Lanes**
>
> The proposed project would generally convert the existing center lanes on Market Street from *transit*-only lanes to *Muni*-only lanes. East of Third Street, the proposed project would convert the existing center lanes on Market Street from general purpose lanes to Muni-only lanes. In addition, a new northbound Muni-only lane would be created on 11th Street for approximately 155 feet south of Market Street. Between 12th and Gough streets, the eastbound lane would be converted from a general purpose lane to a Muni-only lane. A new Muni-only lane would be created on southbound Charles J. Brenham Place in association with the proposed F-loop.

* The third paragraph on Draft EIR p. 2-52 has been revised as follows:

> The F-loop would be in addition to the streetcar tracks in the travel lanes of 11th Street between Market and Mission streets that currently allow streetcars to turn around and layover. The proposed project would shift the track alignment slightly north and slightly west on 11th Street~~ not affect these tracks~~.

* The second paragraph on Draft EIR p. 2-55 has been revised as follows:

> The proposed project would increase the length and width of existing center transit boarding islands to meet ADA standards and better accommodate existing and anticipated future increases in Muni passenger volumes. Some existing center transit boarding islands would be removed or relocated. On remaining islands, the project would construct ramps for people with disabilities to access the F-Line. Specifically, the project would increase the length of islands to up to 210 feet (compared with 110 to 120 feet for

typical existing islands). The project would increase island width up to a total of 9.1 feet (compared with 6.5 feet for typical existing islands). Access to the islands would continue to be via marked crosswalks. The project would include the installation of railings between the boarding lane and the curbside travel lane. Furthermore, the project would construct new islands on Charles J. Brenham Place (northbound only, for Golden Gate Transit), McAllister Street (westbound only), 11th Street, and Seventh Street. The existing northbound curbside stop on 11th Street, which is separated from the curb by motorcycle parking, would be converted to a transit boarding island as part of the project.

* The third paragraph on Draft EIR p. 2-55 has been revised as follows:

Curbside transit stops would be maintained and upgraded with railings to provide separation from new sidewalk-level bikeways. (As shown in Figure 2-4, p. 2-43, the new sidewalk-level bikeways would be constructed between curbside transit stops and the pedestrian through zone, the area intended for pedestrians on sidewalks.) Access to curbside transit stops would be via marked crosswalks. Curbside transit stops in the inbound direction, east of McAllister Street, would be able to accommodate either two or three 60-foot Muni buses. Proposed curbside transit stops would be a minimum of 8 feet wide. In addition, the SFMTA is evaluating a transit service concept as part of the project that would have the outbound 5 Fulton and outbound 9 San Bruno bus routes stop at the curbside transit stop between O'Farrell and Stockton streets, which would require the proposed curbside transit stop to be lengthened by approximately 40 feet.

* Footnote 23 on Draft EIR p. 2-60 has been revised as follows:

[23] As feasible, straight pieces of granite curb would be reused within the proposed project. The project is still in the design phase, but at this time, it is estimated that approximately 20 percent of the existing granite curb on Market Street is straight enough for reuse. The remainder of the existing granite curb is likely to be irreparably damaged during removal and therefore assumed to be not suitable for reuse.

* The fourth paragraph on Draft EIR p. 2-65 has been revised as follows:

The proposed project would remove the existing loading bays within the project corridor to create new loading zones. New loading zones would be created either near or at the same location as the existing loading bays. Changes to loading would be implemented together across the entire corridor at the same time and implemented before construction of the infrastructure improvements. Figure 2-8, p. 2-67, shows the potential locations for the proposed loading zones within the project corridor.

* The second and third paragraphs on Draft EIR p. 2-66 are revised as follows:

New commercial and passenger loading zones would be established where possible on adjacent cross streets and along nearby alleys by converting general on-street parking spaces to commercial loading spaces, white passenger loading zones, and blue

accessible parking spaces. Commercial zones would accommodate truck loading and promote more use of the alleyways to access the rear of the buildings along Market Street. Nearby alleys could include Angelo's Alley and Jessie, Stevenson, and Annie streets. Up to ~~188~~ 198 new cross-street and alleyway commercial loading spaces would be created to provide alternative commercial loading options off of Market Street (see below for information regarding the removal of on-street parking spaces). In addition, existing parking spaces would be converted to create up to ~~46~~23 proposed new passenger loading zones (accommodating 46 vehicles) and ~~eight~~ nine new blue accessible zones on cross streets. In addition, the project would remove one passenger loading zone on the east side of 11th Street.

VEHICULAR PARKING

The proposed project would remove all parking from Market Street, which consists of about six metered parking spaces east of Spear Street. Additional loading zones on cross streets and in rear alleys, or on other streets, would result in part-time (i.e., time-of-day restricted) or all-day removal of parking spaces. The proposed project would convert ~~227~~ 243 existing on-street parking spaces on cross and side streets north and south of Market Street between Steuart and Valencia streets to commercial loading spaces. Changes to parking and loading could be implemented together across the entire corridor at the same time and implemented before construction of the infrastructure improvements.

* The third paragraph on Draft EIR p. 2-69 is revised as follows:

The proposed project would relocate or rehabilitate the underground AWSS lines within the project corridor to maintain a state of good repair or match curb movement. The project would retain the hydrants as streetscape features within the sidewalk area in proximity to their existing locations. However, hydrants would be moved to nearby locations, as required by Public Works contract specifications related to the protection of existing water and AWSS facilities (see Draft Water and AWSS Protection Procedures for Inclusion in Construction Contracts in Appendix 4), to accommodate the proposed pedestrian through zone. One AWSS hydrant located along the northern edge of Market Street between Front and Pine streets may be removed as a result of the project. ~~In addition, the proposed project would retain or replace in kind the utility covers on the AWSS cisterns within the project corridor~~ All utility covers within the project corridor, including AWSS cistern covers, that can be reused would be retained.

* The third paragraph on Draft EIR p. 2-84 is revised as follows:

Like the proposed project, the Western Variant would generally convert the existing center lanes on Market Street from *transit*-only lanes to *Muni*-only lanes. Muni-only lanes permit transit and emergency vehicles at any time; taxis, paratransit vehicles, bicycles, and all other vehicles would be excluded at all times with one exception.

Unlike the proposed project, the Western Variant would allow only Muni vehicles, taxis, paratransit, and emergency vehicles to continue westbound (outbound) on Market Street at Hayes Street. In addition, unlike the proposed project, the Western Variant would allow only transit vehicles, paratransit vehicles, emergency vehicles, and taxis to continue eastbound (inbound) on Market Street at 12th Street. Furthermore, as with the proposed project, the Western Variant would create a new northbound Muni-only lane on 11th Street, extending approximately 155 feet south of Market Street.

* The second paragraph on Draft EIR p. 2-85 is revised as follows:

The Western Variant's transit infrastructure improvements would generally be the same as those of the proposed project: full replacement of existing Muni streetcar rail tracks on Market Street, minor adjustments to the locations of existing streetcar tracks at limited locations, and replacement of the traction power system and OCS (i.e., overhead wires) to maintain a state of good repair. In addition to the improvements described for the proposed project, the Western Variant would also include a new F Market & Wharves historic streetcar line turnout on Market Street at 11th Street to allow westbound F Market & Wharves streetcars to turn directly onto southbound 11th Street.

CHAPTER 4.A, CULTURAL RESOURCES

* Figure 4.A-1 on Draft EIR p. 4.A-3 has been revised to show the revised historic resources and archaeological resources CEQA study areas. (Note: The revised figures are provided at the end of this chapter.)

The first bullet in Mitigation Measure M-CP-1.b on Draft EIR p. 4-A-69 has been revised as follows:

- 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.

CHAPTER 4.B, TRANSPORTATION

* The following figures have been revised to show the revised project corridor boundary; the revised figures are provided at the end of this chapter:

- Figure 4.B-1 on Draft EIR p. 4.B-3
- Figure 4.B-2 on Draft EIR p. 4.B-11
- Figure 4.B-3 on Draft EIR p. 4.B-19
- Figure 4.B-4 on Draft EIR p. 4.B-23
- Figure 4.B-5 on Draft EIR p. 4.B-39
- Figure 4.B-6 on Draft EIR p. 4.B-105

Figure 4.B-6 on Draft EIR p. 4.B-105 has been revised to show the planned Active Beale Street project. (Note: The revised figures are provided at the end of this chapter.)

Footnote 6 on Draft EIR p. 4.B-6 has been revised as follows:

> [6] City roadway designations include (listed in the order of potential vehicle capacity) Freeways, Major Arterials, Transit Conflict Streets, Secondary Arterials, Recreational Streets, Collector Streets, and Local Streets. Each of these roadways has a different potential capacity for mixed-flow traffic and changes that might alter traffic patterns on the given roadway. The General Plan also identifies certain Transit Preferential Streets from among the city's various roadways, each of which is identified as a Primary Transit Street—Transit Oriented, Primary Transit Street—Transit Important, or Secondary Transit Street. The Pedestrian Network is a classification of streets throughout the city used to identify streets developed to be primarily oriented to pedestrian use and includes Citywide Pedestrian Network Streets and Neighborhood Pedestrian Streets. City and County of San Francisco. 2007. San Francisco General Plan. Transportation Element. Available: ~~http://www.sf-planning.org/ftp/General_Plan/I4_Transportation.htm.~~http://generalplan.sfplanning.org/I4_Transportation.htm.

Footnote 17 on Draft EIR p. 4.B-25 has been revised as follows:

> [17] SFMTA. ~~2017~~2018. *Folsom Howard Streetscape Project Alternatives Transportation Analysis, Final Report,* ~~July~~ October 2018.

The bulleted list on Draft EIR p. 4.B-44 has been revised as follows:

- Active Beale Street Project
- 11th Street Improvement Project
- Central Subway Project
- Transit Center District Plan and Public Realm Plan
- Central SoMa Plan Street Network Changes
- Western SoMa Community Plan
- Eastern Neighborhoods Rezoning and Area Plans
- Market and Octavia Area Plan

The impact statement on Draft EIR p. 4.B-45 has been revised as follows:

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 ~~and~~ accessibility to adjoining areas, and ~~could result in~~ potentially hazardous conditions. (Significant and Unavoidable with Mitigation)

Footnote 29 on Draft EIR p. 4.B-46 has been revised as follows:

> [29] BART, *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*, ~~October~~ July 2003.

* The first bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-51 has been revised as follows:

> *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, which would permit only public transit, taxis, and commercial vehicles on Mission Street in the eastbound and/or westbound directions, could be implemented under the following conditions: (1) at least one travel lane is closed on Mission Street between 11th and Steuart streets, resulting in only one open lane in either the eastbound or westbound direction, or (2) construction activity on Market Street in the project corridor restricts transit operations. If implemented because of 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.

* The second bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-51 has been revised as follows:

> *Active Monitoring of Detours* – When detours for transit, other vehicles, and/or people walking and bicycling are implemented, SFMTA shall require that police officers or parking control officers ~~shall~~ monitor critical locations along the detour to promote unobstructed travel by vehicular traffic, transit, and people walking and bicycling.

* The third bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-51 has been revised as follows:

> *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.

* The fourth bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-51 has been revised as follows:

> *Emergency Access Response Plan* – The construction contractor(s) shall 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.

* The seventh bullet in Mitigation Measure M-TR-1 on Draft EIR p. 4.B-52 has been revised as follows:

> *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~~neighbors~~, as well as contact information for specific construction inquiries or concerns.

* The third paragraph on Draft EIR p. 4.B-55 has been revised as follows:

> **Redistribution of Vehicular Traffic on Local Streets.** As noted above, the proposed project is a transportation project and not a land development project; therefore, it would not be expected to generate new vehicle trips as would a new land use. However, the proposed project is expected to result in a redistribution of vehicles due to travel lane reductions and vehicle restrictions on Market Street, leading to increases in total vehicle volumes on Mission Street and on some cross and side streets throughout the study area. Other cross and side streets would experience decreases in traffic volumes as vehicles using Market Street to reach them would shift to other routes, while other streets that already operate at capacity during peak periods would have minimal changes in vehicle volumes but may have some additional queuing outside of the transportation study area. Proposed project changes on 11th Street between Market and Mission streets, including streetcar track replacement, conversion of the existing northbound curbside stop to a transit boarding island, and the provision of a Muni-only lane at the approach to Market Street, would not result in a substantial redistribution of traffic volumes because the travel lanes on 11th Street and permitted turning movements at the intersections of 11th Street at Market Street and at Mission Street would remain similar to existing conditions.

* The first paragraph on Draft EIR p. 4.B-62 has been revised as follows, followed by a new paragraph:

Other transit network changes within the Market Street project corridor include modifications to transit stop spacing and new stop locations (including sidewalk/curb stops and boarding islands), minor service changes to bus routes related to transit stop changes, reconstruction, removal or relocation of transit boarding islands to meet ADA standards, full replacement of the existing street streetcar rail tracks, modifications to Muni route terminal locations, replacement of the transit traction power system and overhead wires, and construction of the F-loop. This streetcar loop would be in addition to the streetcar tracks in the travel lanes of 11th Street between Market and Mission streets that currently allow streetcars to turn around and layover~~, which would not be affected by the proposed project~~. With construction of the streetcar loop, a new F-Short line would be implemented to provide service between the loop and Fisherman's Wharf. During the p.m. peak hour, service would be provided as often as every 10 minutes. Therefore, the combination of the existing F Market & Wharves streetcar line and the new F-Short streetcar line between the F-loop and Fisherman's Wharf would provide streetcar service as often as every five minutes.

On 11th Street, between Mission and Market streets, the proposed project would replace the existing streetcar tracks to the west, convert the existing northbound curbside stop to a transit boarding island, and provide a Muni-only lane at the northbound approach of 11th Street at Market Street (for about 155 feet). These changes would facilitate passenger boarding and northbound Muni bus turns from 11th Street onto Market Street. The existing streetcar layover operations would not be affected by these proposed changes.

The Regional Routes portion of Table 4.B-4 on Draft EIR p. 4.B-64 has been revised as follows:

		2020 Baseline-plus-Project Conditions	
Route/Direction[a]	**2020 Baseline Headways (min:sec)**	**Threshold**[b] **(min:sec)**	**Travel Time Change (min:sec)**
***Regional Routes**[e,f]			
Golden Gate Transit 24, 54, 92, 93 routes – inbound[f]	15:00	7:30	0:37
Golden Gate Transit 24, 54, 92, 93 routes – outbound	15:00	7:30	2:52
Golden Gate Transit Financial District routes – inbound	9:00 ~~12:00~~	4:30 ~~6:00~~	-2:59
Golden Gate Transit Financial District routes – outbound	9:00 ~~12:00~~	4:30 ~~6:00~~	0:01
Golden Gate Transit Salesforce Transit Center routes – inbound	20:00 ~~30:00~~	10:00 ~~15:00~~	-1:05
Golden Gate Transit Salesforce Transit Center routes – outbound	20:00 ~~30:00~~	10:00 ~~15:00~~	1:40
SamTrans 292 and KX – inbound[g]	20:00	10:00	-1:11
SamTrans 292 and KX – outbound	20:00	10:00	-0:47

[f] Within the transportation study area, Golden Gate Transit routes operate on the following streets: Routes 24, 54, 92, 93 routes operate on Hyde, Eighth, and Folsom in the inbound direction and McAllister, Seventh, and Harrison streets in the outbound direction; Financial District routes operate on Battery, First, and Howard streets in the inbound direction and Pine, Sansome, Fremont, Folsom streets in the outbound direction; Salesforce Transit Center routes operate on Hyde, Eighth, and Mission streets in the inbound direction and McAllister, Seventh, and Mission streets in the outbound direction. The 2020 baseline headways for the Golden Gate Transit groupings reflect the headway for the Golden Gate Transit route within the grouping with the shortest headway.

* The first paragraph on Draft EIR p. 4.B-71 has been revised as follows:

Boarding Islands and Curbside Stops. With the proposed project, transit routes would serve at least one of the new relocated or modified stops on Market Street, consisting of 18 curbside stops (nine inbound, nine outbound) and 11 center boarding island stops (six inbound and five outbound). The stop relocations and modification may require some passengers to walk farther to access a transit stop. The increased distance may inconvenience some passengers; however, the curb-lane stop spacing would be consistent with SFMTA's local stop-spacing standards. Real-time transit information signs, advertisements, and transit shelters would be provided at all transit stops along the corridor. The existing northbound curbside stop on 11th Street, which is separated from the curb by motorcycle parking, would be converted to a transit boarding island as part of the project.

The first paragraph on Draft EIR p. 4.B-77 has been revised as follows:

For the above reasons, the Western Variant would further enhance the pedestrian network along Market Street and reduce the potential for conflicts between people walking, bicyclists, and vehicles in the western segment of Market Street between Octavia Boulevard and Ninth/Larkin/Hayes streets relative to the proposed project. Therefore, similar to the proposed project, impacts of the Western Variant on people walking would be ***less than significant***.

* The first paragraph on Draft EIR p. 4.B-86 has been revised as follows:

On streets north and south of Market Street between Steuart and Valencia Street (i.e., referred to as cross and side streets), the proposed project would convert ~~227~~ 243 parking spaces to commercial loading spaces. However, proposed daylighting,[1] bulb-outs, a new Muni layover, accessible parking (blue) spaces, and new passenger loading/unloading zones on the north/south cross streets would eliminate ~~39~~ 45 existing commercial loading spaces on these streets (~~27~~ 33 loading spaces for daylighting, the new Muni layover, accessible parking space, and bulb-outs and 12 loading spaces for passenger loading/unloading zones). Therefore, the net total increase in the number of on-street

[1] *Daylighting* refers to restricting vehicle parking adjacent to corners to enhance visibility for people walking and drivers at the intersection.

commercial loading spaces on streets generally one block north and south of Market Street would be ~~188~~ 198 spaces (i.e., ~~227~~ 243 new spaces converted from general parking spaces to commercial loading spaces, less ~~39~~ 45 existing spaces removed for daylighting and passenger loading/unloading zones = ~~188~~ 198 net new commercial loading spaces).

* The second bullet point on Draft EIR p. 4.B-88 has been revised as follows:

- On cross and side streets, the proposed project would result in a net increase of ~~188~~ 198 on-street commercial loading spaces (i.e., ~~227~~ 243 new, less ~~39~~ 45 existing loading spaces removed for daylighting or passenger loading/unloading zones). However, some loading activities may require carting deliveries further between the loading space and the destination.

* The third paragraph and the first bullet point on Draft EIR p. 4.B-90 have been revised as follows:

There are six on-street metered parking spaces on the north side of Market Street between Spear and Steuart streets. With implementation of the proposed project, these parking spaces would be removed. ~~Nine~~ Ten additional general parking spaces on side and cross streets would be removed to allow for daylighting, two boarding islands, and a traffic calming island.

Implementation of the proposed project would convert on-street parking spaces as follows:

- The proposed project would convert ~~227~~ 243 on-street parking spaces on Market Street cross streets or side streets north and south of Market Street to commercial loading spaces (i.e., removal of ~~73~~ 85 spaces on streets between Steuart and Third/Kearny streets, ~~101~~ 105 spaces on streets between Third/Kearny and Eighth/Hyde streets, and 53 spaces on streets between Eighth/Hyde streets and Octavia Boulevard).

* The first bullet point on Draft EIR p. 4.B-91 has been revised as follows:

- The parking loss as a result of the proposed project would be spread out over the Market Street project corridor between Octavia Boulevard and Steuart Street both north and south of Market Street (i.e., about ~~32~~ 36 percent on streets between Steuart Street and Third/Kearny streets, about ~~46~~ 40 percent on streets between Third/Kearny and Eighth/Hyde streets, and about ~~22~~ 24 percent on streets between Eighth/Hyde streets and Octavia Boulevard).

* The second paragraph on Draft EIR p. 4.B-92 has been revised as follows:

Implementation of the proposed project would not preclude emergency vehicle access along Market Street. Emergency vehicles would be able to travel within the Muni-only lanes, which would have fewer vehicles than the existing mixed-flow travel lanes and

the transit-only lanes. If needed, fire and rescue vehicles would be able to deploy its fire truck apparatus onto the sidewalk-level bikeway to access buildings along Market Street. In addition, the physical changes proposed to the street network would be undertaken in consultation with the fire department and would still allow for emergency vehicle access. As discussed in Impact TR-3, the proposed street network changes would be required to undergo a more detailed design and review by multiple City agencies, including SFMTA's Transportation Advisory Staff Committee, the San Francisco Fire Department, Public Works, along with other agencies. The design and permitting process reviews potential safety issues~~, including whether private vehicles would be exempted from yielding the right-of-way to approaching emergency vehicles~~; therefore, emergency access concerns are resolved prior to the beginning of project construction.

* The third paragraph on Draft EIR p. 4.B-92 has been revised as follows:

Although the project would result in additional vehicles on adjacent streets, the increases would not impede or hinder emergency vehicles. The upgrade of existing signal equipment would include preemption equipped signals to accommodate emergency vehicles that are equipped with preemption equipment. The signal preemption allows the traffic signals in front of the emergency vehicle to change the green phase to allow vehicles to clear before the arrival of the emergency vehicle at the intersection. Because of the wider multiple travel lanes on streets in the vicinity as well as the presence of bicycle lanes on some streets (e.g., Howard, Folsom, Valencia, Second, Seventh, ~~and~~ Eighth, and 11th streets), vehicles would be able to pull over to the side of the street and provide a clear travel path when an emergency vehicle with lights and sirens approaches. Emergency vehicles are also permitted to use transit-only lanes (i.e., the center median right-of-way of the Van Ness BRT, and transit-only lanes on Third, Fourth, and Mission streets), if needed. Therefore, for the reasons described above, the proposed project's impact on emergency access would be ***less than significant***.

The fourth paragraph on Draft EIR p. 4.B-96 has been revised as follows:

A number of cumulative transportation network projects are currently underway or planned that would enhance the transportation network in the project vicinity, particularly for pedestrians and bicyclists. These include the Sixth Street Pedestrian Safety Project, Seventh Street Road Diet, Active Beale Street Project, and 11th Street Improvement Project; ~~and~~ the Transit Center District Plan, Western SoMa Plan, Market and Octavia Plan, Hub Plan, and Central SoMa Plan street network changes; and The Embarcadero Enhancement Project, among others not listed above. Cumulative projects, including the proposed project, would be designed to meet City standards. Other development projects proposing street changes in the area would be subject to these requirements as well. Similar to the proposed project, these street changes would be designed consistent with

City policies and design standards, including the Better Streets Plan, and therefore would not result in significant cumulative impacts related to traffic hazards.

The first paragraph on Draft EIR p. 4.B-103 has been revised as follows:

A number of bicycle projects are currently being proposed near the Market Street project corridor. The proposed project includes new separated bikeways on either side of Market Street between Octavia Boulevard and Steuart Street that would connect with bicycle facilities intersecting Market Street. These include both of the recently implemented separated bikeway projects on Polk and Eighth streets; planned separated bikeway projects along Valencia, 11th, Seventh, and Second streets; planned bike lane projects along Fifth Street; a proposed two-way protected bikeway on Beale Street; and a proposed two-way protected bikeway on The Embarcadero. Improvements facilitating bicycle turns on and off these intersecting bicycle facilities would improve bicycle connectivity to existing and planned class II and class IV bicycle facilities within the Central SoMa Plan area to the south on Howard, Folsom, Brannan, Third, and Fourth streets. These bicycle projects would enhance cycling conditions in the transportation study area. In addition, the proposed bicycle facilities along the Market Street project corridor would connect with recently completed parking-protected bicycle lanes on upper Market Street between Octavia Boulevard and Duboce Avenue (see Figure 4.B-6, p. 4.B-105).

CHAPTER 4.C, NOISE

* Figure 4.C-2 on Draft EIR p. 4.C-13 has been revised to show the revised project corridor boundary. (Note: The revised figures are provided at the end of this chapter.)

Footnote 6 on Draft EIR p. 4.C-9 has been revised as follows:

[6] California Department of Transportation. 2013. Transportation and Construction Vibration Guidance Manual. September. Table ~~19~~20. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf. Accessed: June 27, 2018.

The source in Table 4.C-13 on Draft EIR p. 4.C-44 has been revised as follows:

Source: California Department of Transportation. 2013. *Transportation and Construction Vibration Guidance Manual.* Table ~~19~~20. September. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

The source in Table 4.C-14 on Draft EIR p. 4.C-45 has been revised as follows:

Source: California Department of Transportation. 2013. *Transportation and Construction Vibration Guidance Manual.* September. Table ~~19~~20. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

The source in Table 4.C-15 on Draft EIR p. 4.C-46 has been revised as follows:

Source: California Department of Transportation. 2013. *Transportation and Construction Vibration Guidance Manual*. Table ~~19~~20. September. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

The source in Table 4.C-16 on Draft EIR p. 4.C-51 has been revised as follows:

Notes:

1. These values represent the loudest noise levels generated by each equipment type at a distance of 50 feet.
2. These values were calculated by subtracting 6 dBA from each L_{max} value at 50 feet, based on geometric attenuation for a point source.
3. Represented by Tractor from the Federal Highway Administration's *User's Guide*.
4. Represented by Dump Truck from the Federal Highway Administration's *User's Guide*.

dBA = A-weighted decibel

L_{max} = maximum sound levels

Source: Federal Highway Administration. 2006. *Roadway Construction Noise Model User's Guide*. Available: http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf. January. Washington, DC.

~~Mesikepp, Sam. Hathaway Dinwiddie Construction Company. August 31, 2016 – written communication.~~

* The first paragraph in Mitigation Measure M-NO-1 on Draft EIR p. 4.C-55 has been revised as follows:

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 fourth bullet in Mitigation Measure M-NO-1 on Draft EIR p. 4.C-56 has been revised as follows:

o Prohibit ~~I~~idling of inactive construction equipment for prolonged periods ~~shall be prohibited~~ (i.e., more than 2 minutes).

* The sixth bullet in Mitigation Measure M-NO-1 on Draft EIR 4.C-56 has been revised as follows:

o 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.

* The eleventh bullet in Mitigation Measure M-NO-1 on Draft EIR 4.C-57 has been revised as follows:

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.

* The first paragraph in Mitigation Measure M-NO-3 on Draft EIR p. 4.C-65 has been revised as follows:

Mitigation Measure M-NO-3: Nighttime Construction Vibration Control Measures – Annoyance Prior to issuance of a construction permit, a detailed pre-construction 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.

CHAPTER 4.D, AIR QUALITY

* Figure 4.D-1 on Draft EIR p. 4.D-5 and Figure 4.D-2 on Draft EIR p. 4.D-11 have been revised to show the updated project corridor boundary. (Note: The revised figures are provided at the end of this chapter.)

* A new paragraph has been added after the last paragraph on Draft EIR p. 4.D-38 as follows:

In addition, the project may result in detours of bus routes to other streets during the construction period, thereby reducing receptor exposure to PM2.5 exhaust and DPM emissions in certain areas while increasing exposure in other areas. However, these detours would be temporary in nature and bus routes would be restored upon project completion. Detours would utilize surrounding streets, such as Mission Street, maintaining the existing air quality conditions in the project area. SFMTA has also been modernizing its fleet from older diesel buses to cleaner, electric hybrid buses, which has substantially reduced associated emissions. Therefore, health risk impacts on nearby

sensitive receptors from detours during construction would be similar to existing conditions.

* The third paragraph on Draft EIR p. 4.D-40 has been revised as follows:

In addition to relocating general vehicle travel, the proposed project would create several new loading zones along Market Street. The loading zones would be designed to accommodate a variety of vehicle types, including paratransit, taxi, and commercial vehicles. Up to 22 loading zones would be created on Market Street, replacing the existing 23 commercial loading bays (with several of the new 22 zones overlapping in part or whole with one of the existing 23 bays). See Figure 2-8 in Chapter 2, *Project Description*. In addition to these loading zones, commercial loading spaces would be created on the east side of Fourth Street near Mission Street and in the alleys south of Market Street to accommodate truck loading (specifically, Angelo's Alley and Jessie [100 and 800 blocks], Stevenson [100, 200, 400, 500, and 600 blocks], and Annie [unit block] streets).[51]

* The second paragraph on Draft EIR p. 4.D-41 has been revised as follows:

As noted above, new loading spaces would be created on the east side of Fourth Street near Mission Street and in the alleys south of Market Street. Unlike the multi-use zones proposed on Market Street, these spaces could be used predominantly by diesel-fueled commercial vehicles. Receptors adjacent to these new loading spaces may be exposed to increased diesel emissions from vehicle idling. However, all loading and unloading involving commercial vehicles in these spaces would be subject to CCR title 13, section 2485, which limits idling to fewer than five minutes. Moreover, with the proposed project, fewer than four vehicles per hour would be expected on the east side of Fourth Street near Mission Street, Jessie Street, Annie Street, and Angelo's Alley; fewer than 11 vehicles per hour would be expected on Stevenson Street.[55]

* The third paragraph on Draft EIR p. 4.D-41 has been revised as follows:

The proposed project itself would not induce loading demand (e.g., by introducing a new land use). Furthermore, vehicles that would have otherwise idled at one of the loading bays on Market Street or in the alleys south of Market Street, including unauthorized locations (e.g., an alley travel lane or a parking lane), would be diverted from Market Street. Proposed side-street loading spaces on Angelo's Alley, as well as Stevenson, Jessie, and Annie streets, and a loading space on the east side of Fourth Street, near Mission Street would be adjacent (i.e., within the same block or in the vicinity) to existing loading bays, which would either be removed or relocated and converted into multi-use loading zones. Accordingly, the overall pollutant burden within 1,000 feet of the new loading spaces is anticipated to be similar to existing and

no-project conditions, and incremental health risks are not expected to exceed the cumulative project contribution thresholds.

CHAPTER 5, OTHER CEQA CONSIDERATIONS

The impact statement on Draft EIR p. 5-3 has been revised as follows:

- 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 ~~and~~ accessibility to adjoining areas, and ~~could result in~~ potentially hazardous conditions.

CHAPTER 6, ALTERNATIVES

The impact statement on Draft EIR p. 6-4 has been revised as follows:

- 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 ~~and~~ accessibility to adjoining areas, and ~~could result in~~ potentially hazardous conditions.

The second paragraph on Draft EIR p. 6-38 has been revised as follows:

> However, Alternative E would only partially meet the objective of replacing aging infrastructure to keep people, goods, and services moving. Although Alternative E would replace ~~existing surface rail as well as~~the OCS, ~~(~~along with partially restored, reconstructed, or realigned Path of Gold light standards~~)~~, Alternative E would leave in place all existing surface rail and below-ground infrastructure. Some of this infrastructure was found to be at or beyond its useful life.

The impact statement on Draft EIR p. 6-57 in Table 6-4 has been revised as follows:

> 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 ~~and~~ accessibility to adjoining areas, and ~~as well as~~ potentially hazardous conditions. (SUM)

APPENDIX 5, LIST OF PAST, PRESENT, AND REASONABLY FORESEEABLE PROJECTS

Table A in Draft EIR Appendix 5 on p. 3 has been revised as follows:

Case Number	Address/Project Name	Project Summary
2013.1049E	950–974 Market Street (Assessor's Block 0342/001)	The project would demolish the buildings and parking lot/structure and construct a 12-story mixed-use building with 242 dwelling units, a 232-room hotel, and approximately 16,600 gross square feet of commercial retail space. As part of the project, the sidewalk along the south side of Turk Street between Taylor and Mason streets would be reconstructed and widened (except at the pedestrian loading area) to remove conflicts and existing sidewalk elevators and accommodate new sidewalk transformer vaults at the western end of the Turk Street frontage. The project received CEQA clearance in 2016. The project is currently under construction.

Table A in Draft EIR Appendix 5 on p. 21 has been revised as follows:

Case Number	Address/Project Name	Project Summary
NA	Active Beale Street Project	The project is part of the South Downtown Design + Activation (Soda) Plan. Along Beale Street, the project would convert a general travel lane to a Muni and Golden Gate Transit–only lane between Market and Natoma streets to improve operations of Muni buses accessing the new Transbay Transit Center. To improve the transition to this new Muni and Golden Gate Transit–only lane, the westernmost lane on Davis Street at the approach to Market Street would be right turn only, except for Muni and Golden Gate Transit buses. In addition, a new southbound right-turn pocket would be created on Beale Street at Mission Street by eliminating some freight and passenger loading spaces to minimize conflicts between transit buses and vehicles queuing to make a right turn. Furthermore, a protected bikeway (class IV) would be built along the eastern side of Beale Street between Market and Folsom streets. This would be accomplished by eliminating parking and loading along the east side of Beale Street between Mission and Folsom streets and by converting the left-turn lane between Market and Mission streets into a left-turn pocket. The sidewalk bulb-out on the east side of Beale Street south of Market Street would be extended by approximately 65 feet to provide additional width for pedestrians. It is anticipated that the project would be constructed in winter 2020.

Table A in Draft EIR Appendix 5 on p. 21 has been revised as follows:

Case Number	Address/Project Name	Project Summary
NA	Eleventh Street Improvement Project	The project would include the following near-term improvements: Mission Street to Market Street northbound protected bikeway, Division Street to Harrison Street northbound protected bikeway, and continental crosswalks across alleys and intersections. Specifically, the project would convert the existing bicycle lane (class II facility) on 11th Street to a class IV separated bikeway. The project would include the following proposed long-term improvements: overhead wiring relocation and pole replacement, two travel lanes on 11th Street (one in each direction) between Market Street and Division Street, new bike lane configuration between Mission Street and Harrison Street, maintaining the existing left- and right-turn lanes, and two new Ford GoBike bike share stations at the intersection of 11th and Minna streets. It is anticipated that the project would be constructed in 2025.
2018-016691ENV	301 Mission Street Project	The project would involve a structural update, consisting of the installation of approximately fifty-two 24-inch-diameter piles, which would be placed under a portion of the sidewalk areas surrounding 301 Mission Street on Fremont and Mission streets and connecting to the existing mat foundation of 301 Mission Street. These piles would extend into bedrock, approximately 235 feet beneath the sidewalk. The piles and mat foundation would be approximately 15 feet beneath the sidewalk, with a vault approximately 12 feet beneath the sidewalk. The project is currently under environmental review.

Note A in Table A of Draft EIR Appendix 5 on p. 21 has been revised as follows:

Notes:

[a.] Project summaries are based on the best available information as of ~~January~~ September 2019.

APPENDIX 6-1B, HISTORIC ARCHITECTURAL RESOURCES MAP

* Appendix 6-1B (Historic Architectural Resources Map) has been revised to show the revised project corridor boundary; the revised map is provided at the end of this chapter after the revised figures.

APPENDIX 6-2, CEQA HISTORICAL RESOURCES SUMMARY TABLES

The citation in Table A-4 on p. 26 has been revised as follows:

> *San Francisco Landmarks Preservation Advisory Board. 201~~3~~2. Market Street Masonry Historic District, Ordinance No. 64-~~1~~3. September. San Francisco, CA*

The citation in Table A-5 on p. 68 has been revised as follows:

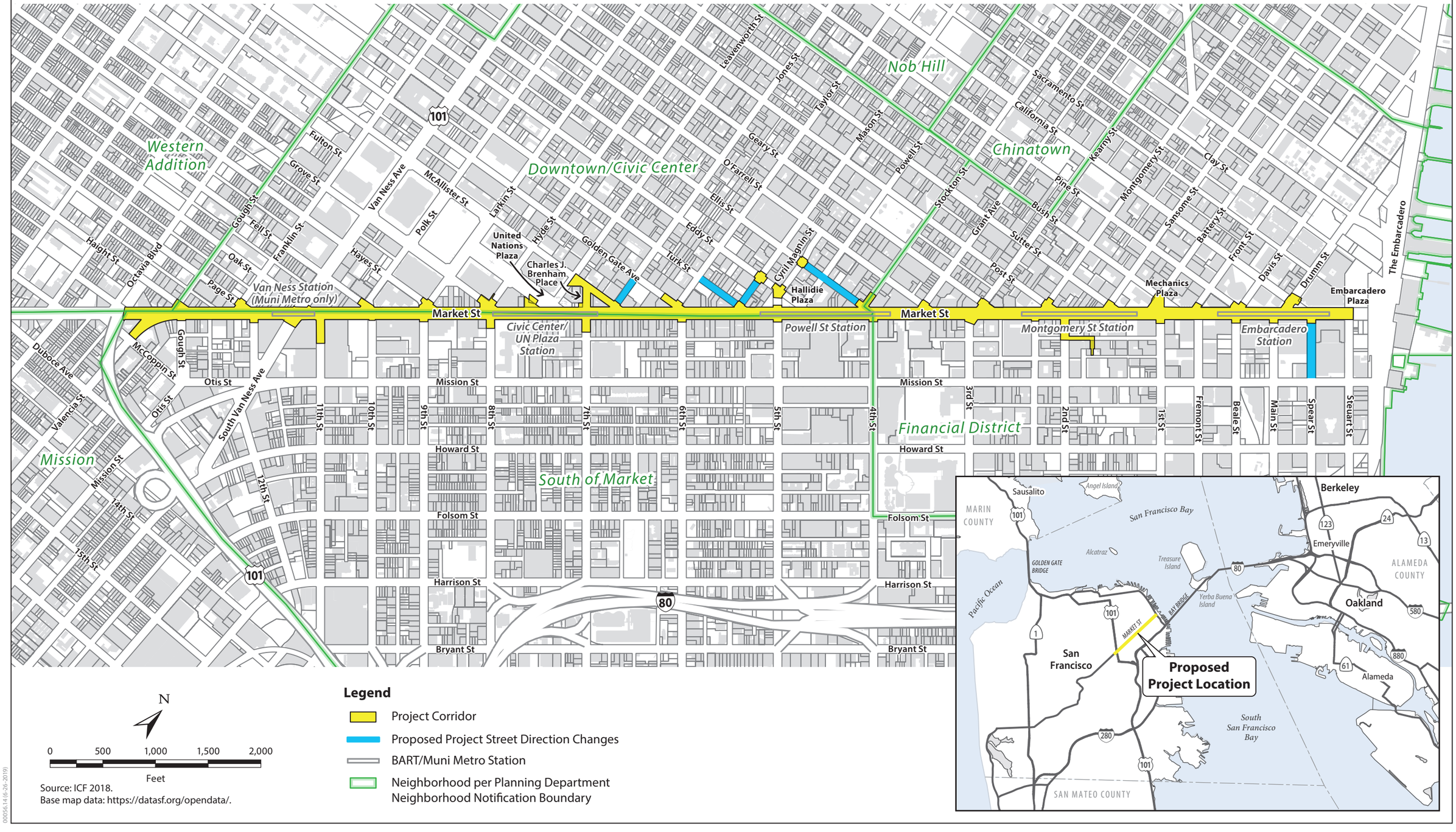
> *ICF ~~International and Caravaglia Architecture~~. 201~~6~~9. 1 Bush Street, Department of Parks and Recreation Form 523A, B, and L. ~~July~~January. San Francisco, CA. Prepared for the San Francisco Department of Public Works, San Francisco, CA;*
>
> *Cable Cars National Register of Historic Places Inventory—Nomination Form. April. Washington D.C.*

APPENDIX 7, TRANSPORTATION SUPPORTING INFORMATION

* Appendix 7 (Transportation Supporting Information) has been revised to depict various staff-initiated changes; the revised portions are provided at the end of this chapter after the revised figures. In addition, Appendix 7 includes a new table that identifies the parking loss due to the revised Mitigation Measure M-TR-1 discussed above.

REVISED ARCHAEOLOGICAL SENSITIVITY ASSESSMENT

* The Archaeological Sensitivity Assessment has been revised to depict the revised project corridor boundary.



00056.14 (6-26-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-1
Proposed Project Location

Continued on panel below

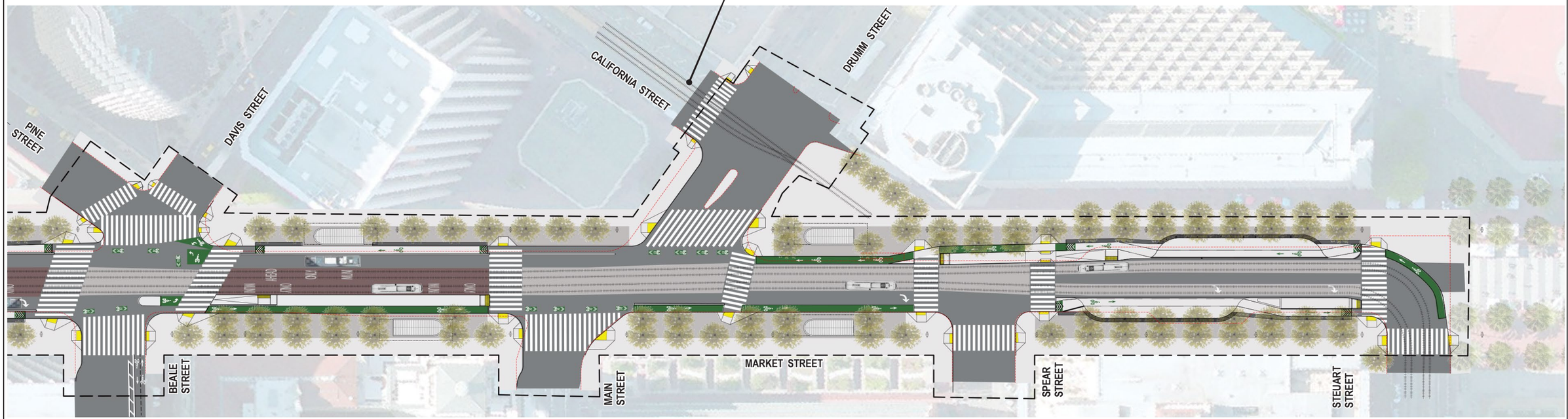
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Path: \\PDC\DTRDS\S1\Projects_1\CCSF\0006_14_BetterMarketStreet\mxd\Project_FIG_AHSS_20190218.mxd User: 90860 Date: 6/26/2019

Better Market Street Project
Case No. 2014.0012E

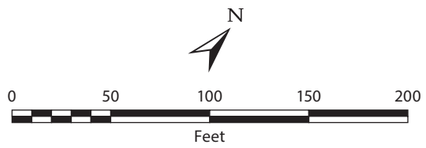
Source: Parcels, City and County of San Francisco 2014;
Streets, City and County of San Francisco 2014;
Building Footprints, City and County of San Francisco 2011;
Project Corridor, San Francisco Public Works 2018;
Path of Gold and Auxillary Water Supply System, City and County of San Francisco 2018; Golden Triangle and Path of Gold Associated Historic Utility Boxes, ICF 2019.

(Revised) Figure 2-2
Existing Historic Utilities and Shoreline Markers within the Project Corridor



Notes:

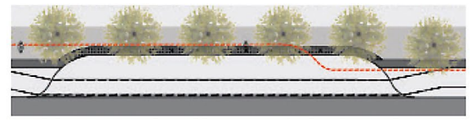
- Substations that would be upgraded as part of the proposed project are located within the project corridor but are not identified in this figure for security purposes.
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- This figure does not illustrate some project-related activities that would result in changes to existing cultural resources (e.g., relocating and rehabilitating underground Auxiliary Water Supply System lines). Refer to Section F of Chapter 2, *Project Description*, for a detailed discussion.



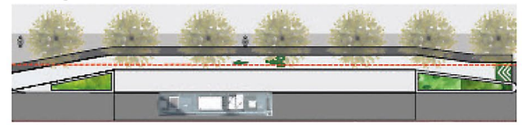
Source: San Francisco Public Works, 2019.

Legend

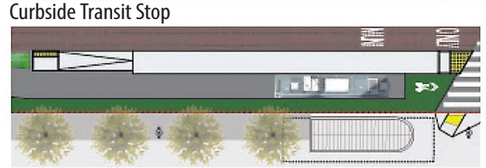
- Project Corridor (area of ground disturbance)
- Existing curb
- SIDEWALK
  - Buffer
  - Furnishings Zone
  - Pedestrian Through Zone
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- Street-level Bicycle Lane
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- BART/Muni Metro Portal
- Streetcar
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- Curb Ramp
- Street Tree (*Platanus* monoculture replaced with trees screened for use by the Public Works Bureau of Urban Forestry)
- Streetcar Tracks



Loading Zone



Curbside Transit Stop

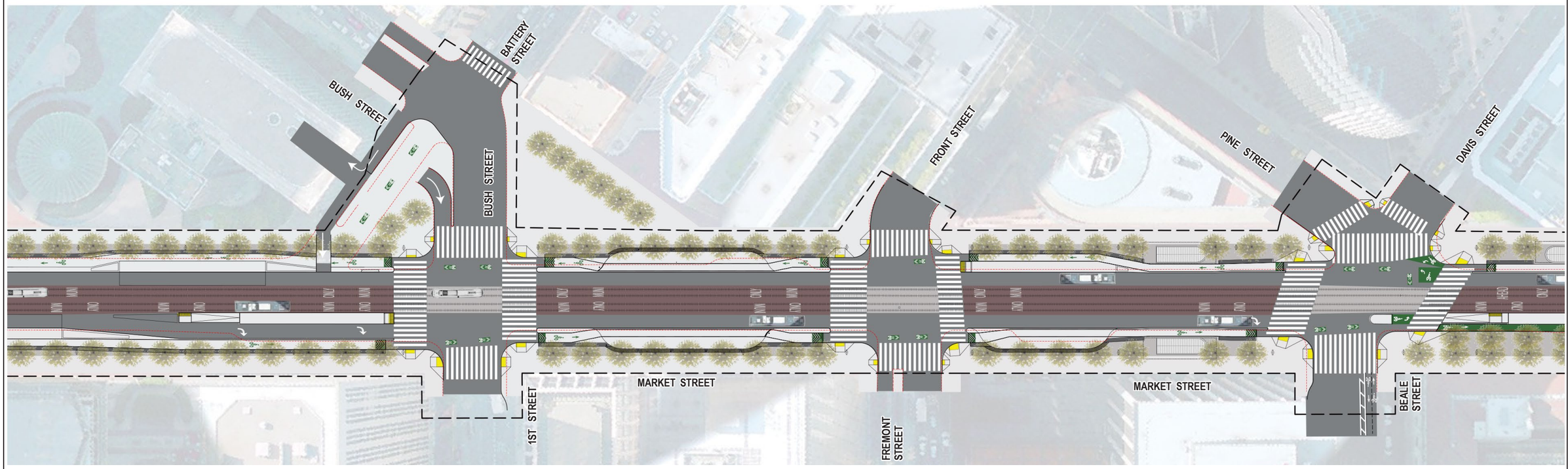


Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 1 of 10)



Notes:

- Substations that would be upgraded as part of the proposed project are located within the project corridor but are not identified in this figure for security purposes.
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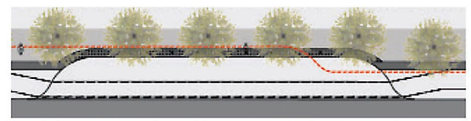
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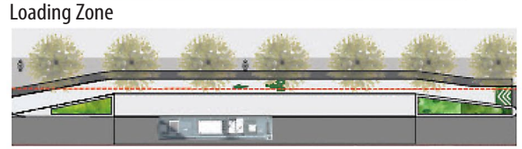
Source: San Francisco Public Works, 2019.

Legend

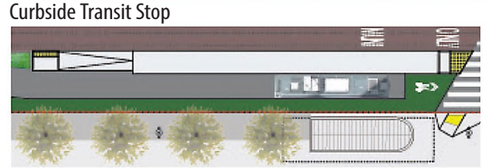
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Loading Zone



Curbside Transit Stop

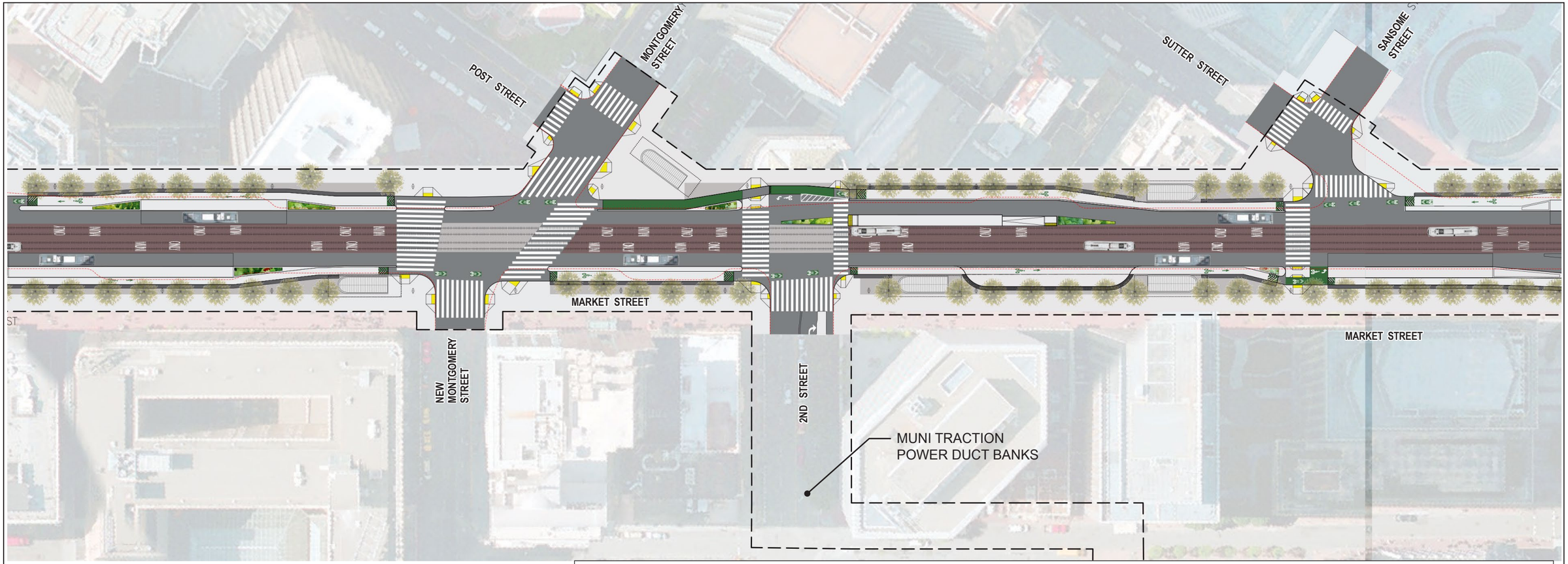


Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 2 of 10)



Notes:

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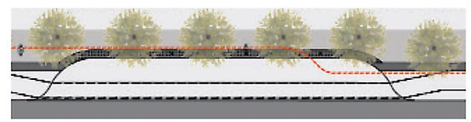
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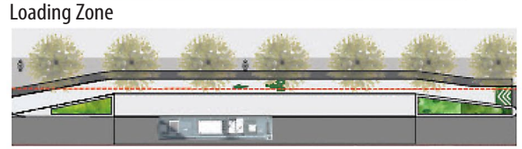
Source: San Francisco Public Works, 2019.

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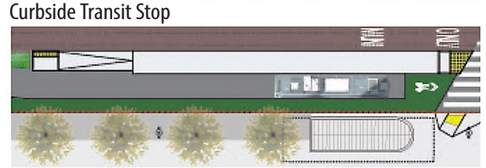
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Loading Zone



Curbside Transit Stop

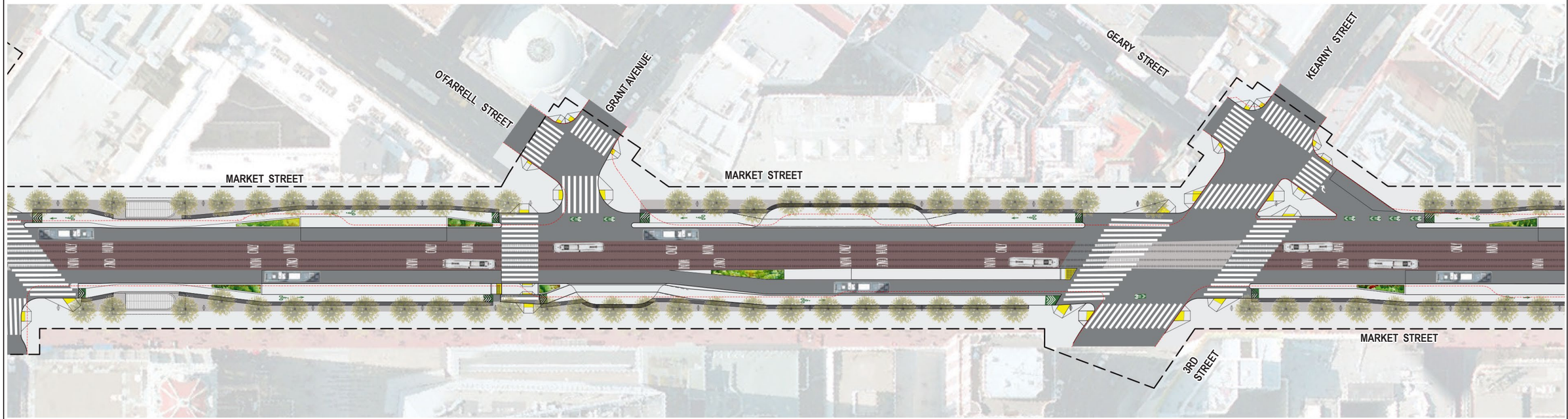


Center Transit Boarding Island

00056.14 (7-9-2019)

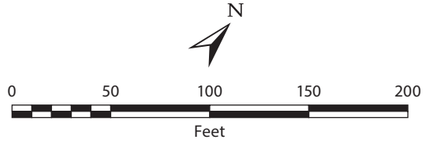
Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 3 of 10)



Notes:

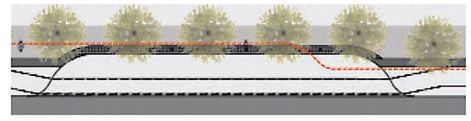
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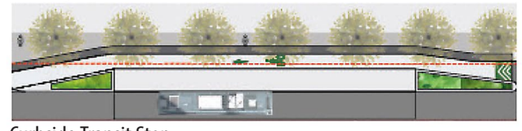


Source: San Francisco Public Works, 2019.

Legend

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Loading Zone


Curbside Transit Stop

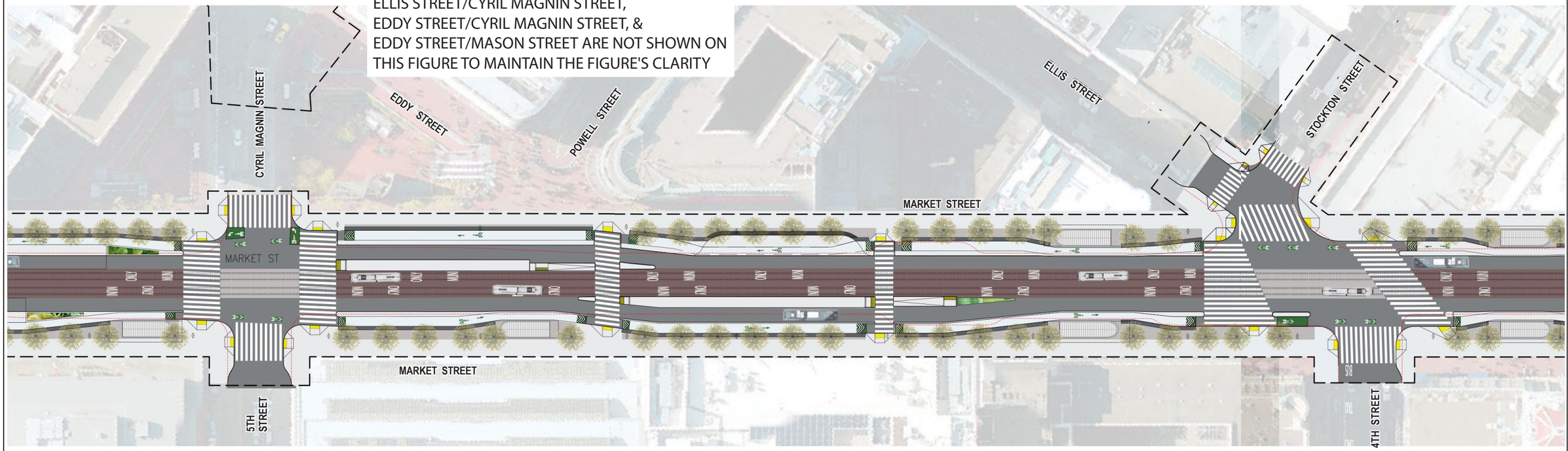

Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 4 of 10)

OFF-CORRIDOR TRAFFIC CHANGES AT ELLIS STREET/CYRIL MAGNIN STREET, EDDY STREET/CYRIL MAGNIN STREET, & EDDY STREET/MASON STREET ARE NOT SHOWN ON THIS FIGURE TO MAINTAIN THE FIGURE'S CLARITY



Notes:

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N

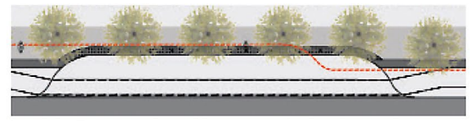
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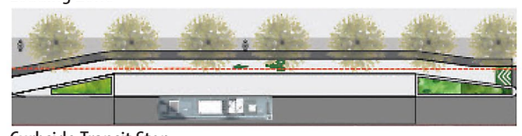
Source: San Francisco Public Works, 2019.

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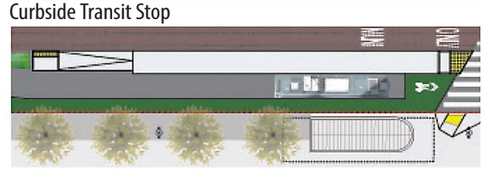
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Loading Zone



Curbside Transit Stop

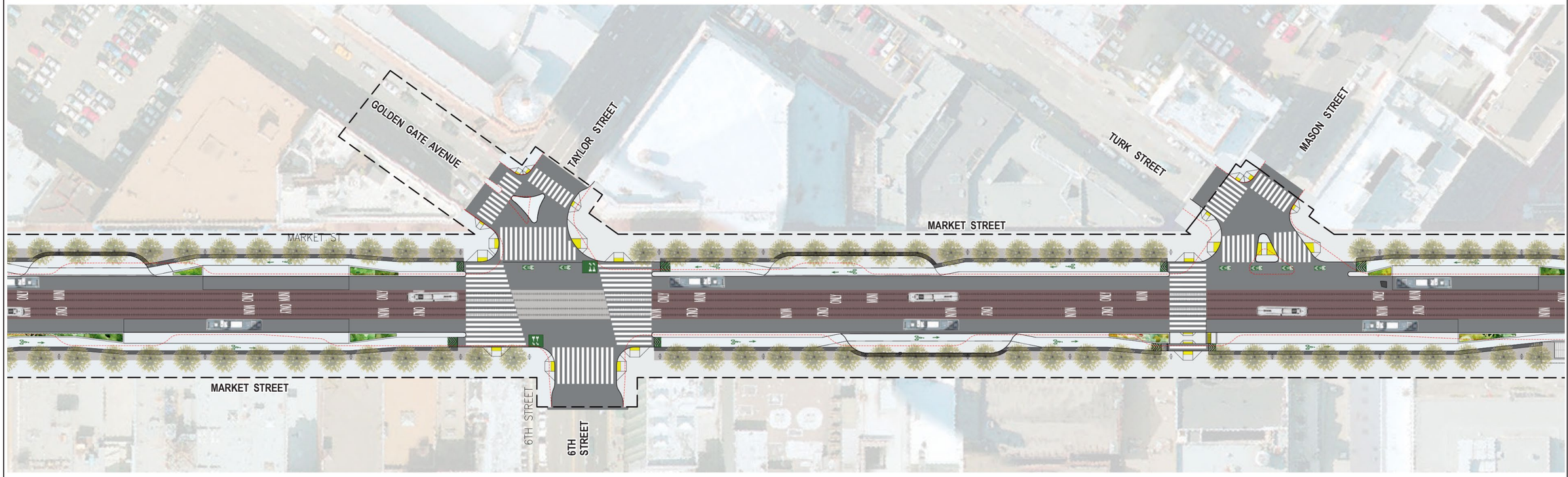


Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 5 of 10)



Notes:

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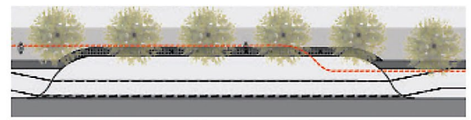
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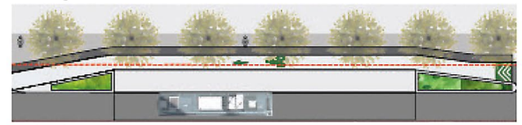
Source: San Francisco Public Works, 2019.

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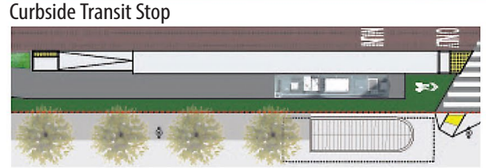
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Loading Zone



Curbside Transit Stop

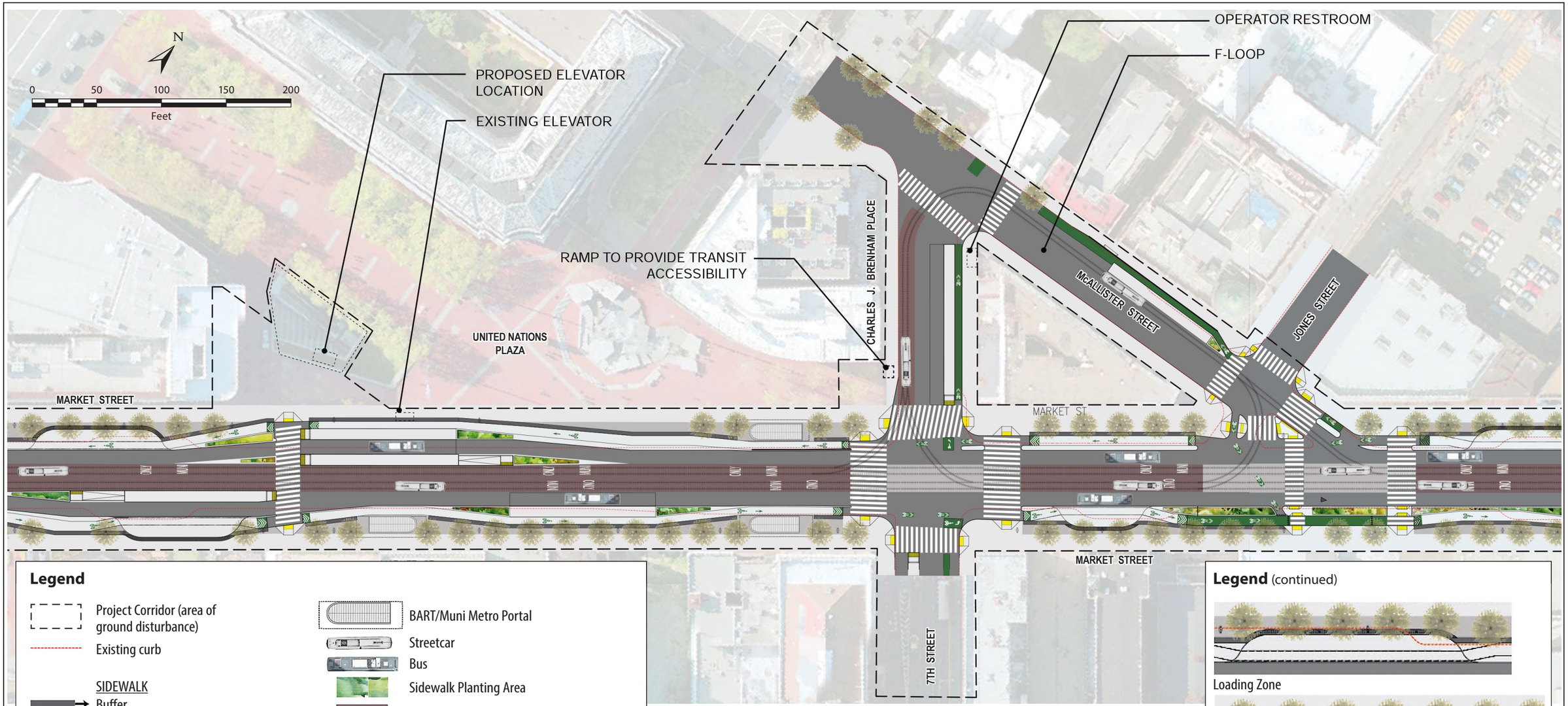


Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 6 of 10)



Legend

- Project Corridor (area of ground disturbance)
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- SIDEWALK
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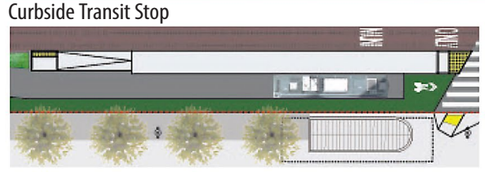
Source: San Francisco Public Works, 2019.

Legend (continued)

Loading Zone



Curbside Transit Stop

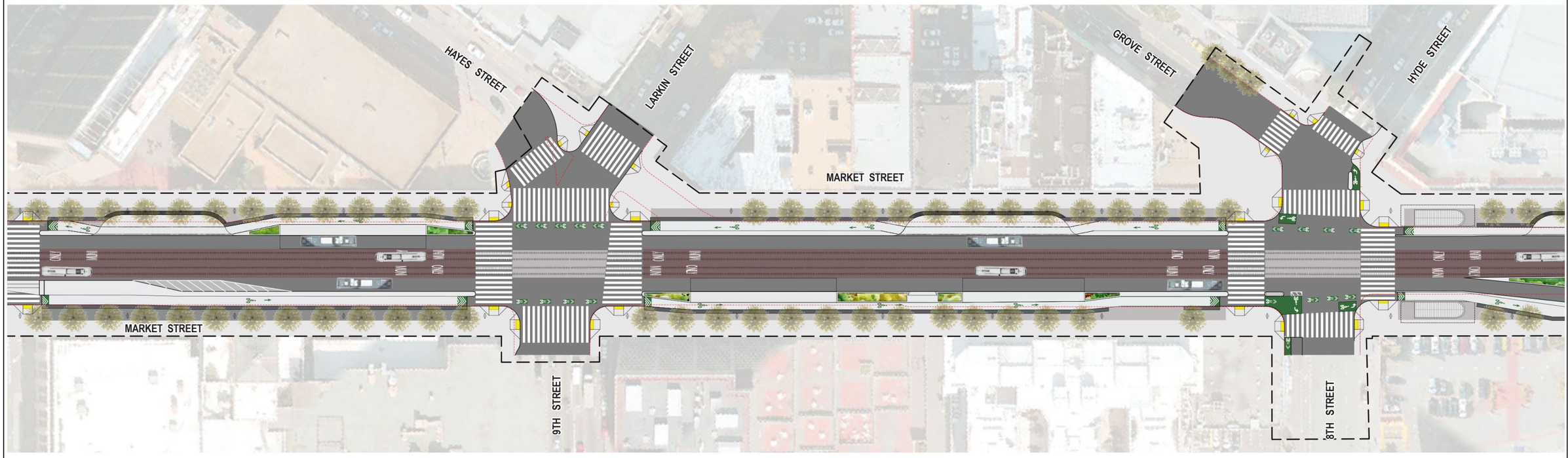


Center Transit Boarding Island

00055.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 7 of 10)



Notes:

- Substations that would be upgraded as part of the proposed project are located within the project corridor but are not identified in this figure for security purposes.
- This figure illustrates proposed transportation and streetscape improvements that would occur slightly outside of the project corridor (e.g., traffic striping and turn restrictions); these proposed improvements would not involve ground disturbance.
- This figure does not illustrate some project-related activities that would result in changes to existing cultural resources (e.g., relocating and rehabilitating underground Auxiliary Water Supply System lines). Refer to Section F of Chapter 2, *Project Description*, for a detailed discussion.

N

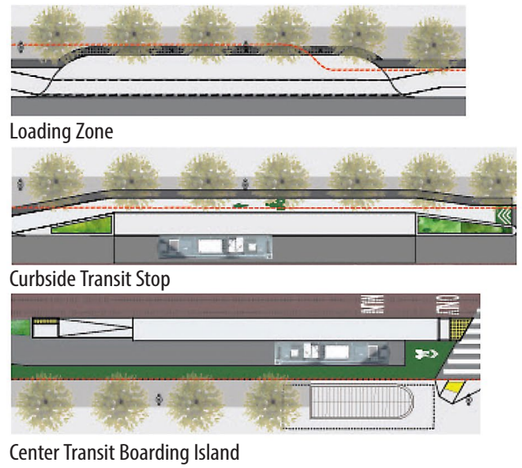
0 50 100 150 200

Feet

Source: San Francisco Public Works, 2019.

Legend

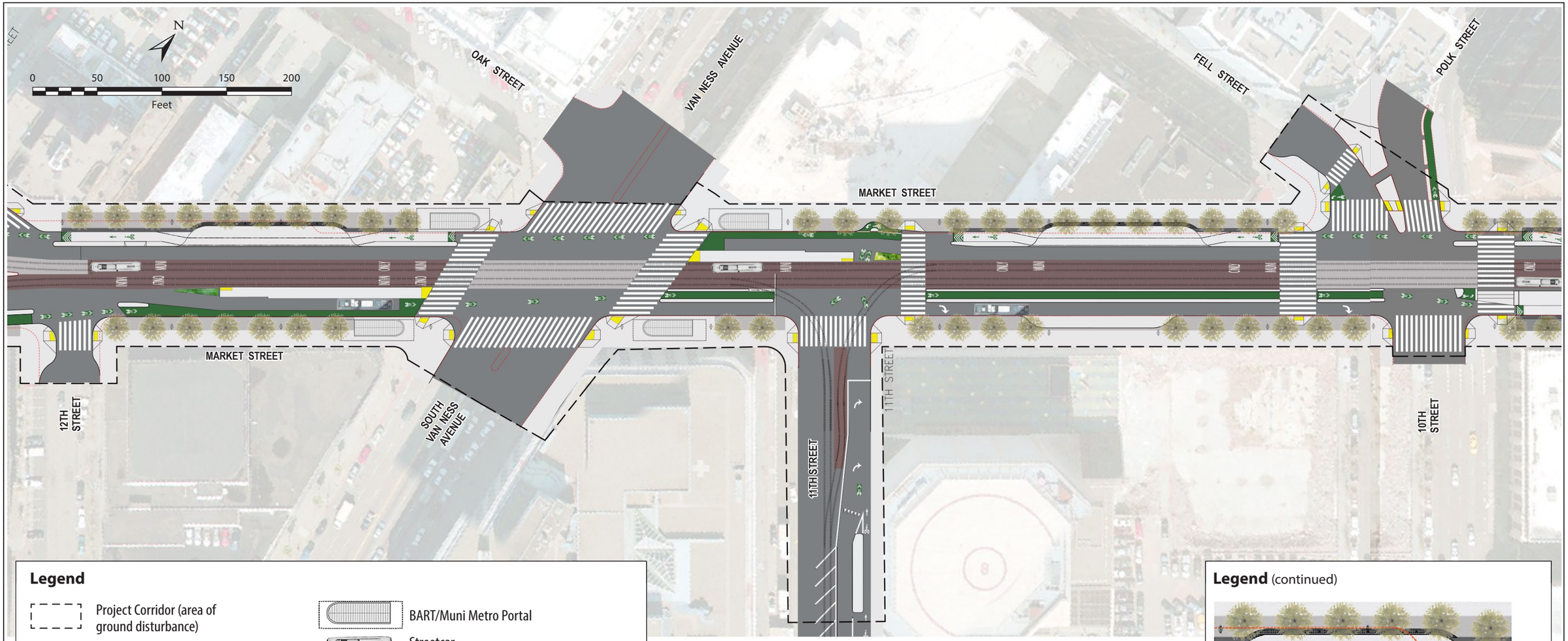
- Project Corridor (area of ground disturbance)
- Existing curb
- SIDEWALK
  - Buffer
  - Furnishings Zone
  - Pedestrian Through Zone
- Sidewalk-level Bikeway
- Street-level Bicycle Lane
- Path of Gold (partially restored, reconstructed, and realigned)
- Crosswalk
- BART/Muni Metro Portal
- Streetcar
- Bus
- Sidewalk Planting Area
- Muni-only Lanes (center lanes east of Third Street, eastbound lane between 12th and Gough streets, & southbound lane on Charles J. Brenham Place)
- Curb Ramp
- Street Tree (*Platanus* monoculture replaced with trees screened for use by the Public Works Bureau of Urban Forestry)
- Streetcar Tracks



00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 8 of 10)



Legend

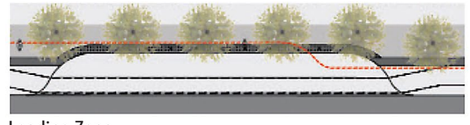
- Project Corridor (area of ground disturbance)
- Existing curb
- SIDEWALK
  - Buffer
  - Furnishings Zone
  - Pedestrian Through Zone
- Sidewalk-level Bikeway
- Street-level Bicycle Lane
- Path of Gold (partially restored, reconstructed, and realigned)
- Crosswalk
- BART/Muni Metro Portal
- Streetcar
- Bus
- Sidewalk Planting Area
- Muni-only Lanes (center lanes east of Third Street, eastbound lane between 12th and Gough streets, & southbound lane on Charles J. Brenham Place)
- Curb Ramp
- Street Tree (*Platanus* monoculture replaced with trees screened for use by the Public Works Bureau of Urban Forestry)
- Streetcar Tracks

Notes:

- Substations that would be upgraded as part of the proposed project are located within the project corridor but are not identified in this figure for security purposes.
- This figure illustrates proposed transportation and streetscape improvements that would occur slightly outside of the project corridor (e.g., traffic striping and turn restrictions); these proposed improvements would not involve ground disturbance.
- This figure does not illustrate some project-related activities that would result in changes to existing cultural resources (e.g., relocating and rehabilitating underground Auxiliary Water Supply System lines). Refer to Section F of Chapter 2, *Project Description*, for a detailed discussion.

Source: San Francisco Public Works, 2019.

Legend (continued)



Loading Zone



Curbside Transit Stop

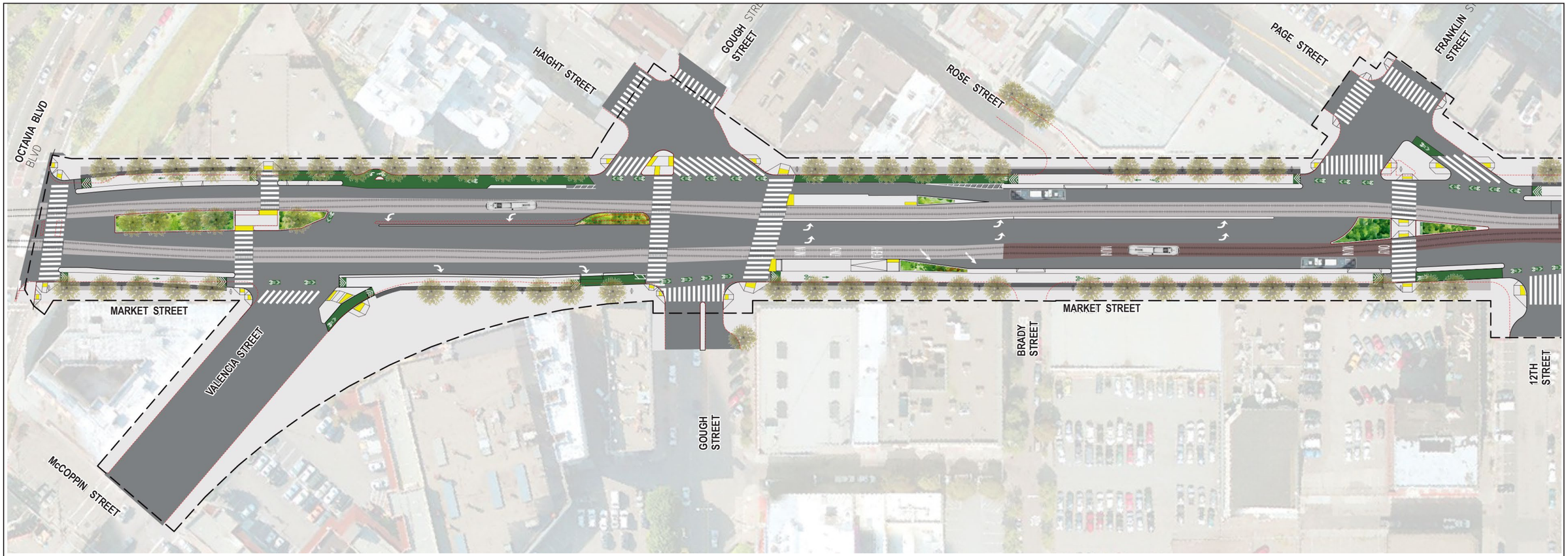


Center Transit Boarding Island

00056.14 (7-15-2019)

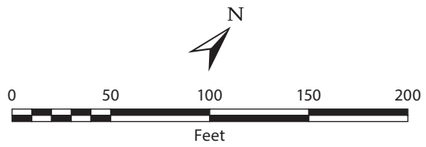
Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 9 of 10)



Notes:

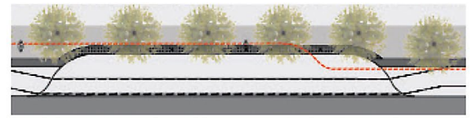
- Substations that would be upgraded as part of the proposed project are located within the project corridor but are not identified in this figure for security purposes.
- This figure illustrates proposed transportation and streetscape improvements that would occur slightly outside of the project corridor (e.g., traffic striping and turn restrictions); these proposed improvements would not involve ground disturbance.
- This figure does not illustrate some project-related activities that would result in changes to existing cultural resources (e.g., relocating and rehabilitating underground Auxiliary Water Supply System lines). Refer to Section F of Chapter 2, *Project Description*, for a detailed discussion.

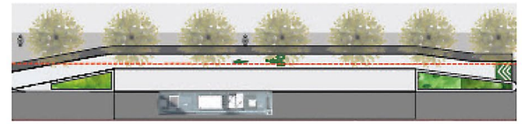


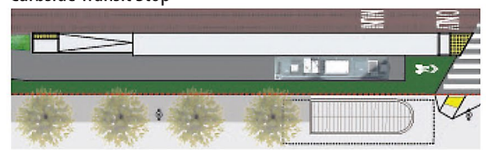
Source: San Francisco Public Works, 2019.

Legend

- Project Corridor (area of ground disturbance)
- Existing curb
- SIDEWALK
  - Buffer
  - Furnishings Zone
  - Pedestrian Through Zone
- Sidewalk-level Bikeway
- Street-level Bicycle Lane
- Path of Gold (partially restored, reconstructed, and realigned)
- Crosswalk
- BART/Muni Metro Portal
- Streetcar
- Bus
- Sidewalk Planting Area
- Muni-only Lanes (center lanes east of Third Street, eastbound lane between 12th and Gough streets, & southbound lane on Charles J. Brenham Place)
- Curb Ramp
- Street Tree (*Platanus* monoculture replaced with trees screened for use by the Public Works Bureau of Urban Forestry)
- Streetcar Tracks


Loading Zone


Curbside Transit Stop


Center Transit Boarding Island

00056.14 (7-9-2019)

Better Market Street Project
Case No. 2014.0012E

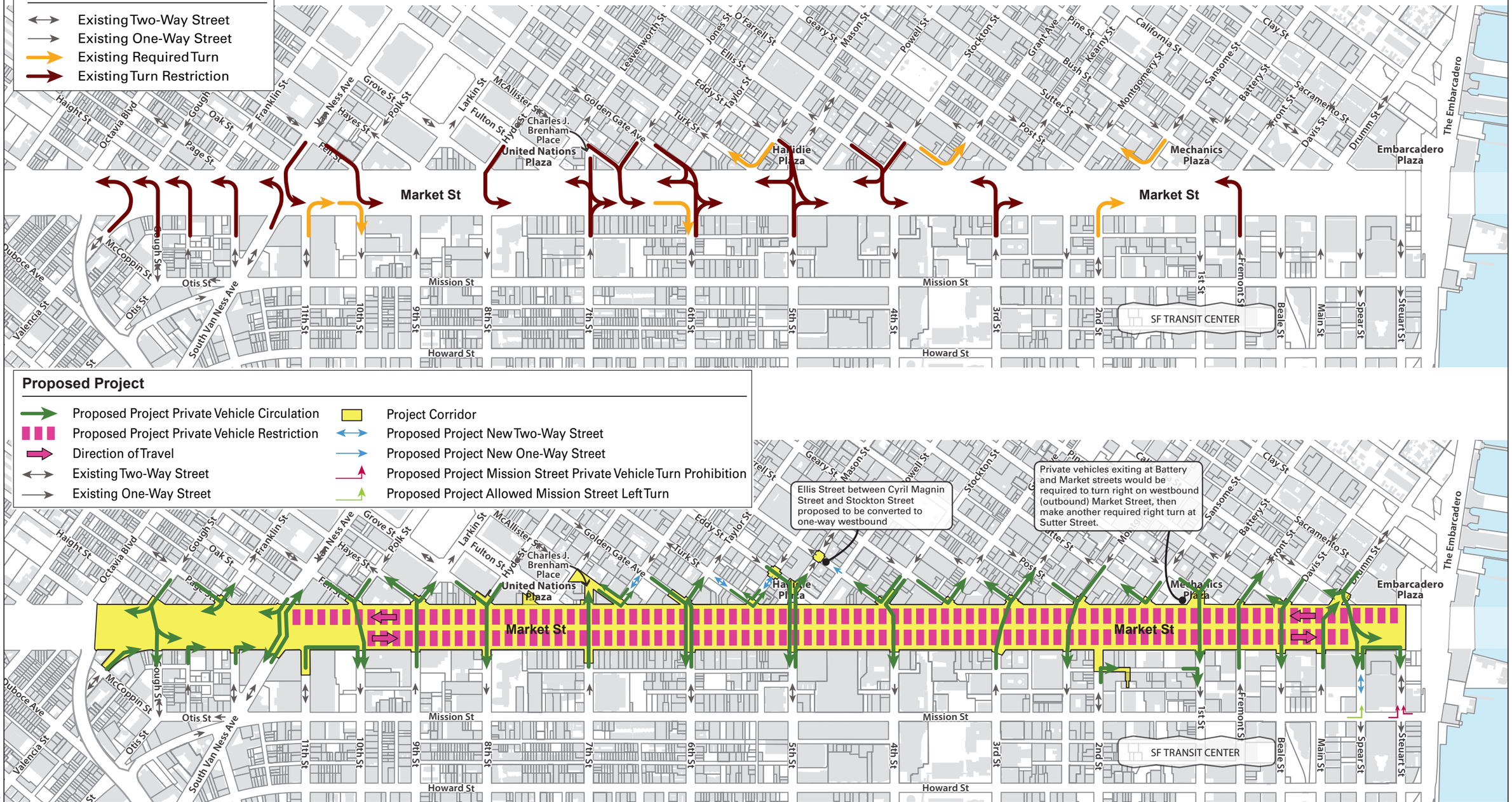
(Revised) Figure 2-3
Proposed Project Transportation and Streetscape Improvements (Sheet 10 of 10)

Existing Conditions (as of 2018)

- Existing Two-Way Street
- Existing One-Way Street
- Existing Required Turn
- Existing Turn Restriction

Proposed Project

- Proposed Project Private Vehicle Circulation
- Proposed Project Private Vehicle Restriction
- Direction of Travel
- Existing Two-Way Street
- Existing One-Way Street
- Project Corridor
- Proposed Project New Two-Way Street
- Proposed Project New One-Way Street
- Proposed Project Mission Street Private Vehicle Turn Prohibition
- Proposed Project Allowed Mission Street Left Turn



Note: Proposed Project Private Vehicle Restriction would prohibit all turns onto Market Street.
Note: Market Street is shown wider than map scale for clarity.
Source: MTA 2019.

0 500 1,000 1,500 2,000 Feet

N

00056.14 (6-26-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-5
Existing and Proposed Project Vehicle Circulation



Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-6
(Revised) Existing and Proposed Project Muni Transit Stop Spacing



Notes:

- Market Street is shown wider than map scale for clarity.

Bikeway Definitions:

- Class II Bicycle Facility – Bike Lane
- Class III Bicycle Facility – Bike Route
- Class IV Bicycle Facility – Separated Bikeway

Legend

- Project Corridor
- Existing Class II Bicycle Facility
- Existing Class III Bicycle Facility
- Existing Class IV Bicycle Facility
- Proposed Project Sidewalk-Level Bikeway (Class IV Bicycle Facility)

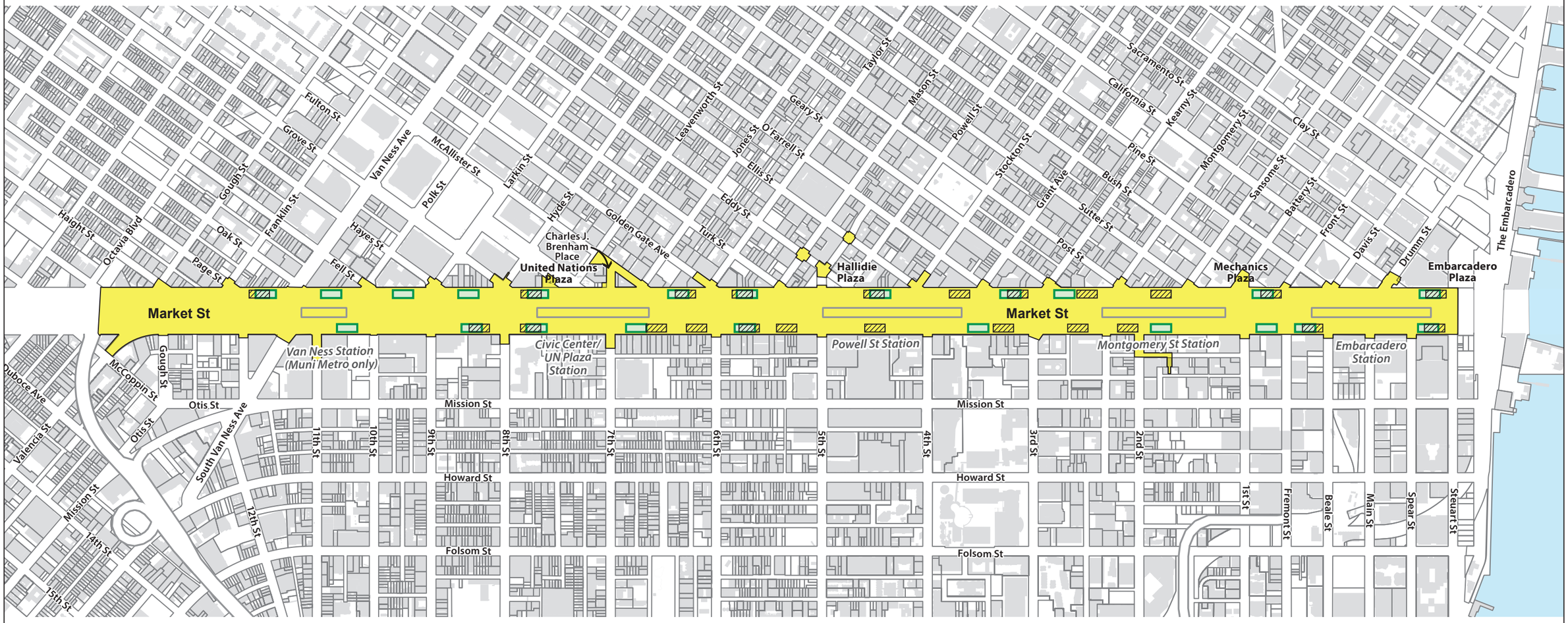
0 500 1,000
Feet

Source: Parisi Transportation Consulting 2018.
Other sources: Streets: City and County of San Francisco 2014

00056.14 (7-2-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-7
Existing and Proposed Project Bicycle Facilities



Legend

- Project Corridor
- Existing Loading Bay (to be removed under the proposed project)
- Proposed Project Loading Zone
- BART/Muni Metro Station

Notes:

- The locations of the existing and proposed loading zones are approximate.
- Market Street is shown wider than map scale for clarity.
- Not shown are up to 188 new cross-street and alleyway commercial loading spaces proposed as part of the project.

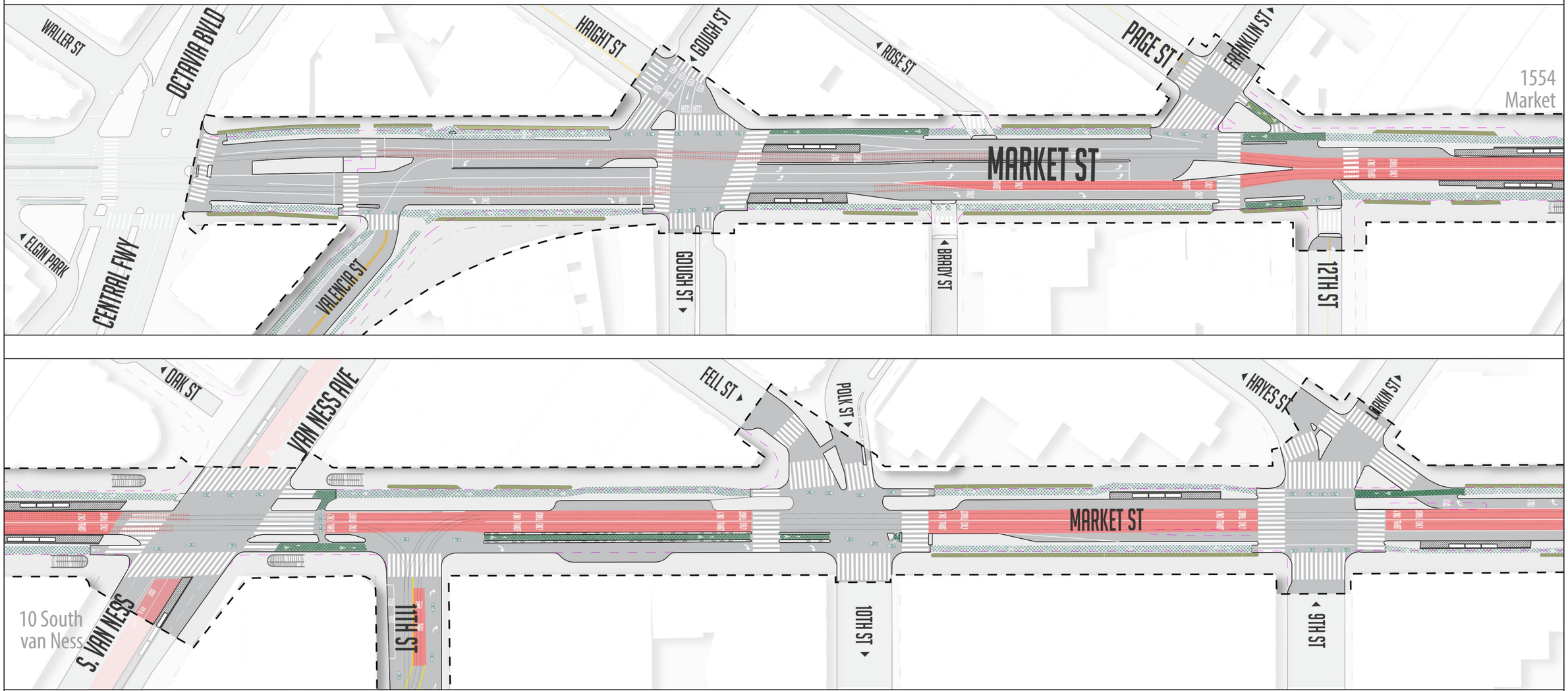
Source: MTA 2018.

00056.14 (6-27-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-8
Existing Loading Bays and Proposed Project Loading Zones

Continued on panel above



Continued on panel below

Note: The Western Variant would include the approximately 0.6-mile portion of Market Street between Octavia Boulevard and a point approximately 300 feet east of the Hayes and Market Street intersection. The project's proposed transportation and streetscape improvements outside of the Western Variant also apply to the Western Variant.

Source: San Francisco Environmental Planning 2019; MTA 2019.

0 50 100 150
Feet

LEGEND

- Western Variant
- Existing Curb Line
- Muni Metro Portals
- Proposed Western Variant Transit Island/Stop
- Proposed Western Variant Transit-Only Lane
- Proposed Western Variant /Relocated Muni Streetcar Rail Track
- Proposed Western Variant Street-Level Bikeway
- Proposed Western Variant Sidewalk-Level Bikeway
- Proposed Western Variant Concrete Protection Treatment
- Proposed Western Variant Sidewalk/Pedestrian Buffer

00056.14 (7-2-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-9
Western Variant Transportation and Streetscape Improvements

Existing Conditions (as of 2018)

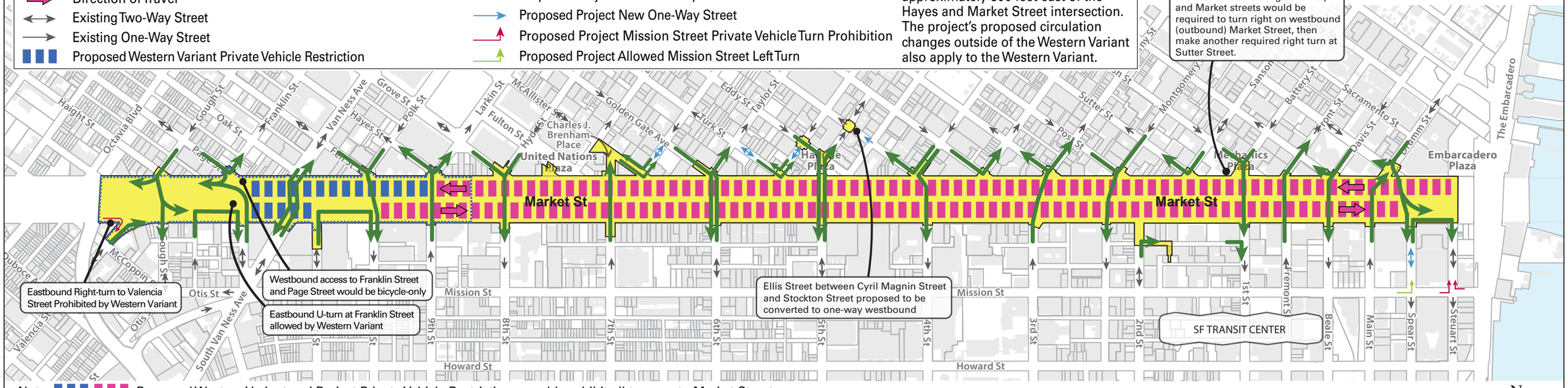
- Existing Two-Way Street
- Existing One-Way Street
- Existing Required Turn
- Existing Turn Restriction



Western Variant

- Proposed Project and Western Variant Private Vehicle Circulation
- Proposed Project Private Vehicle Restriction
- Direction of Travel
- Existing Two-Way Street
- Existing One-Way Street
- Proposed Western Variant Private Vehicle Restriction
- Project Corridor
- Western Variant
- Proposed Project New Two-Way Street
- Proposed Project New One-Way Street
- Proposed Project Mission Street Private Vehicle Turn Prohibition
- Proposed Project Allowed Mission Street Left Turn

Note: The Western Variant would include the approximately 0.6-mile portion of Market Street between Octavia Boulevard and a point approximately 300 feet east of the Hayes and Market Street intersection. The project's proposed circulation changes outside of the Western Variant also apply to the Western Variant.



Note: Proposed Western Variant and Project Private Vehicle Restrictions would prohibit all turns onto Market Street.

Note: Market Street is shown wider than map scale for clarity.

Source: MTA 2019.

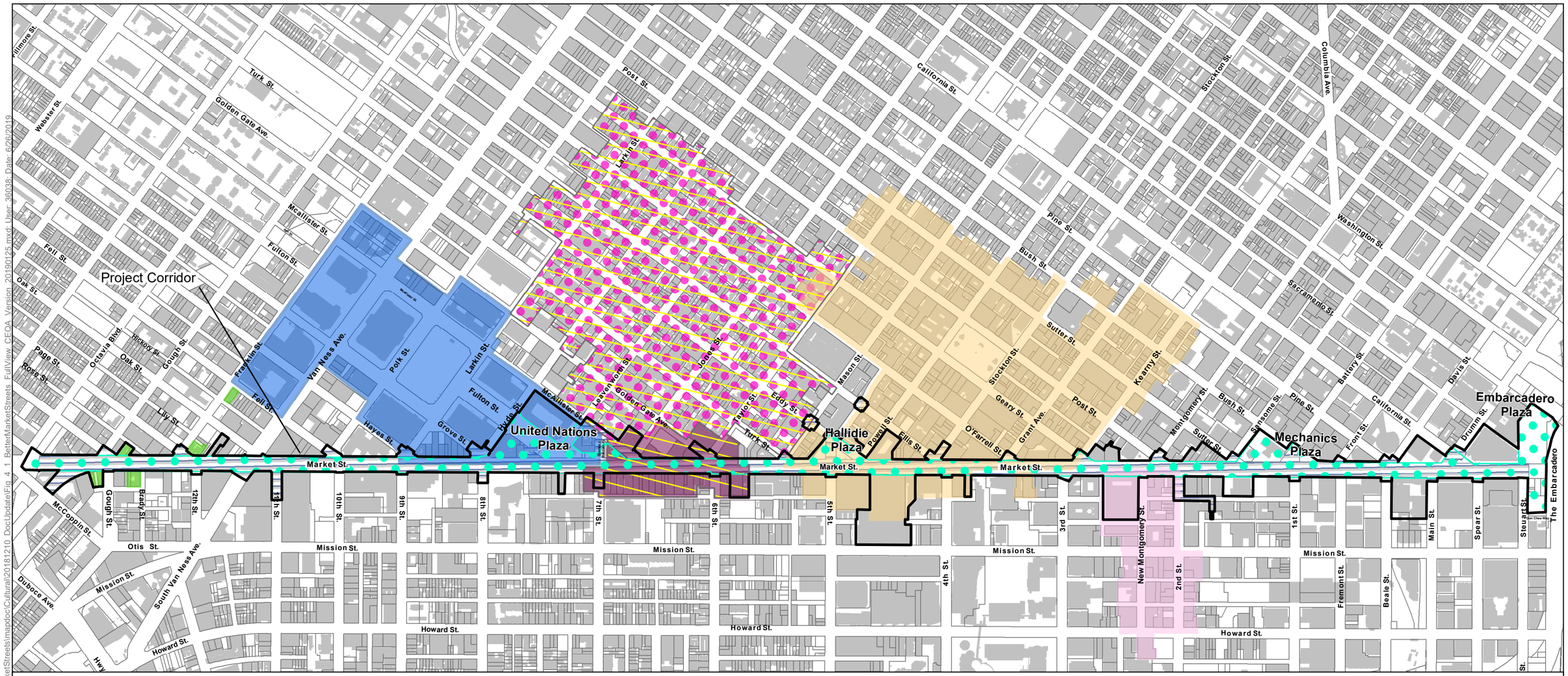
0 500 1,000 1,500 2,000 Feet

N

00056.14 (7-10-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 2-10
Existing and Proposed Western Variant Vehicle Circulation



Legend

- Historic Resources CEQA Study Area
- Archaeological Resources CEQA Study Area
- Market Street Masonry Landmark District
- Market Street Cultural Landscape District
- New Montgomery-Mission-2nd Street Conservation District
- Kearny-Market-Mason-Sutter Conservation District
- Uptown Tenderloin National Register Historic District
- Market Street Theatre and Loft National Register Historic District
- Civic Center Landmark District
- LGBTQ Tenderloin Historic District

Note: Portions of the Path of Gold, Path of Gold Associated Historic Utility Boxes, Golden Triangle Light Standards, San Francisco Auxiliary Water Supply System, and San Francisco Cable Cars National Historic Landmark are located within the Historic Resources CEQA Study Area but are not identified in this map to maintain the map's clarity. The locations of individual architectural historic resources within the Historic Resources CEQA Study Area are identified in Appendix 6. The historic districts shown in this figure were determined eligible for listing in local, state, or national inventories. Refer to Section 4.A, Cultural Resources, for more information on each district's eligibility.

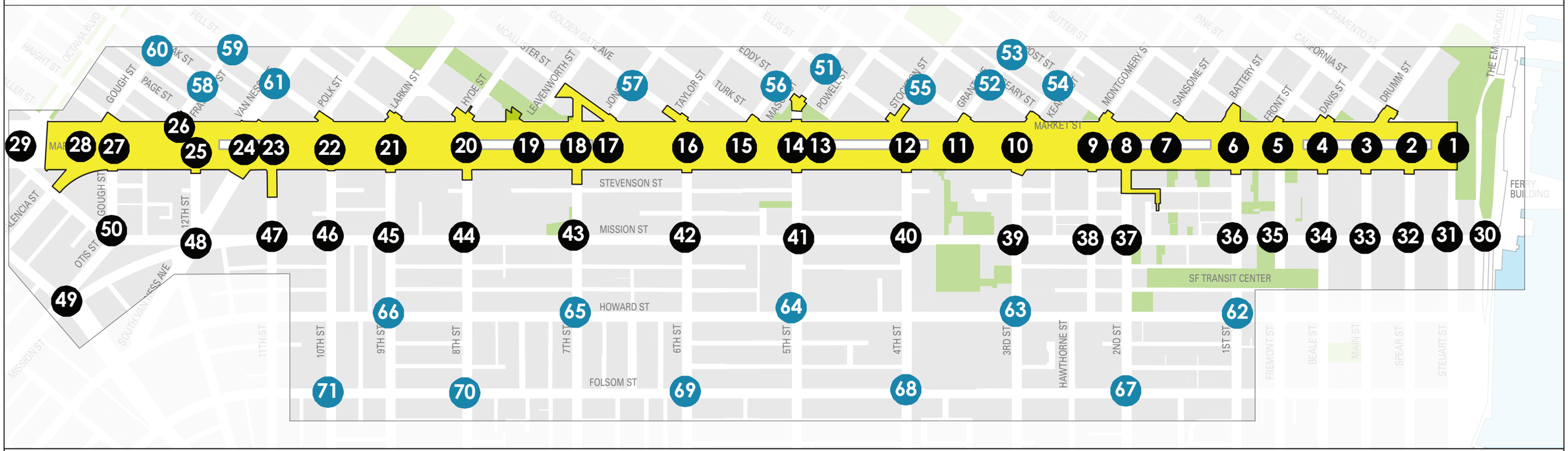
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Feet

Path: \\PDCCITRDSGIS1\Projects_1\CCSF00056_14_BetterMarketStreets\mxd\Cultural\20181210_DocUpdate\Fig_4_1_BetterMarketStreets_FullView_CEQA_Version_20190125.mxd User 38038 Date 6/26/2019

Better Market Street Project
Case No. 2014.0012E

Source: Parcels, City and County of San Francisco 2014; Streets, City and County of San Francisco 2014; Building Footprints, City and County of San Francisco 2011; Historic Resources CEQA Study Area, ICF and San Francisco Public Works 2018; Historic Districts, San Francisco Planning Department 2018.

(Revised) Figure 4.A-1
CEQA Study Areas for Historic and Archaeological Resources



Notes:

- Market Street is shown wider than map scale for clarity.
- Intersections 1 through 50 were studied in VISSIM; intersections 51 through 71 were studied in Synchro
- VISSIM and Synchro are two software packages that were used to evaluate transit travel times. The VISSIM microsimulation software was used to evaluate multi-modal operations and estimate transit travel times on Market and Mission streets, while the Synchro traffic operations software was used to conduct isolated intersection analysis for study intersections located to the north and south of Market and Mission streets.

LEGEND

- Project Corridor
- Transportation Study Area
- Muni Metro/BART Station
- # **VISSIM Study Intersection**
- # **Synchro Study Intersection**

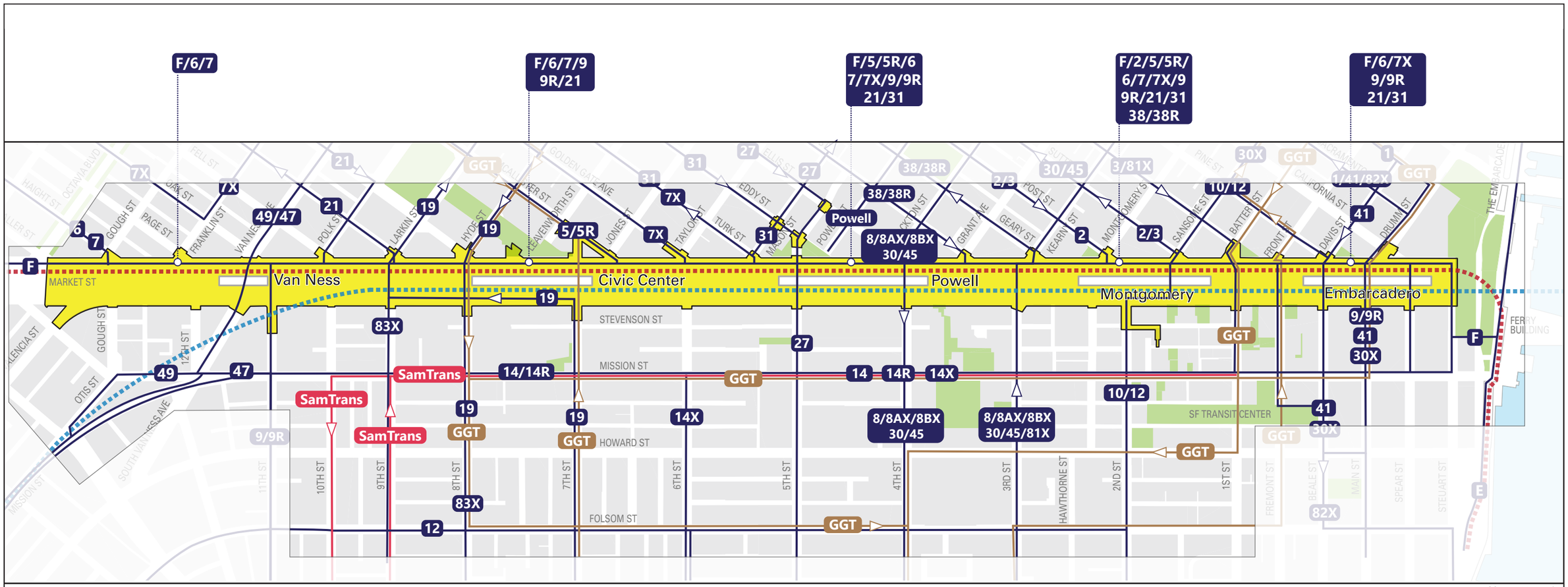
Map not to scale

Source: Fehr & Peers 2019.
Other sources: Streets: City and County of San Francisco 2014.

00056.14 (7-2-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-1
Transportation Study Area and Study Intersections



Notes:

- Market Street is shown wider than map scale for clarity.
- At time of publication, Transbay bus routes are being routed to the Temporary Transbay Terminal rather than to Salesforce Transit Center.
- Routes that do not cross through transportation study area are not shown for clarity (1AX, 1BX, 31AX, 31BX, 38AX, 38BX and 76X).
- Muni routes N and L owls and AC Transit service (routes 800 and 822) also run on Market Street overnight.
- Full Muni map is located in Appendix 7.

Map not to scale

LEGEND

- Project Corridor
- Muni Metro/BART Station
- BART Service
- SFMTA Muni Metro
- SFMTA Muni Routes
- SamTrans Service
- Golden Gate Transit (GGT) Service

Routes serving Ferry Plaza
E/F/6/7X/14
14X/21/31

Routes serving Mission & Main
2/9R/14R

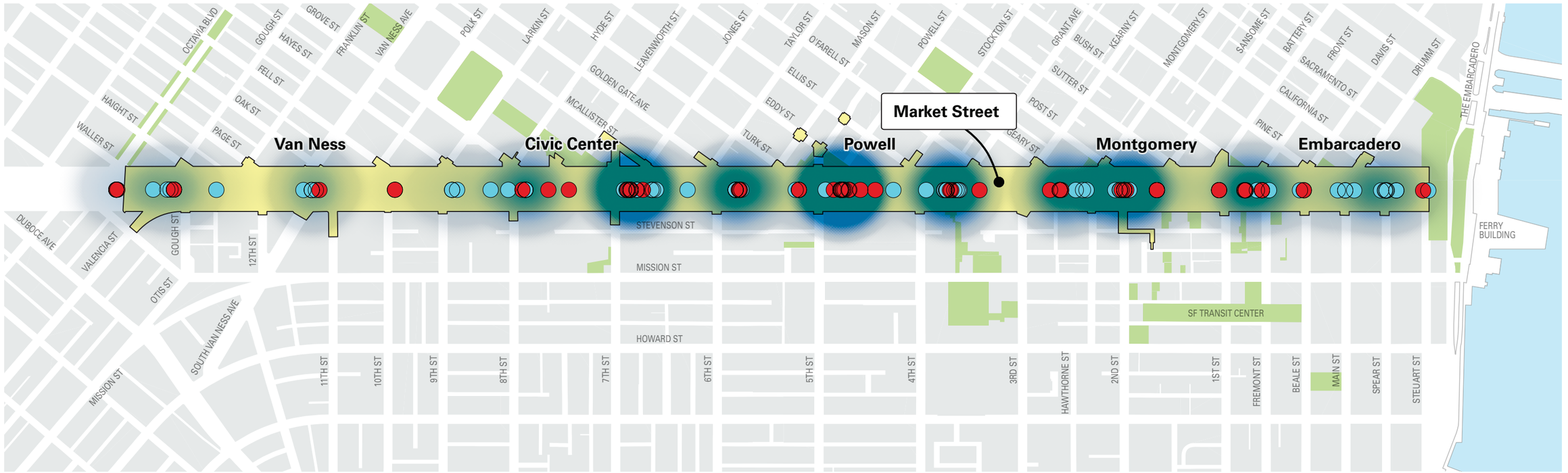
Routes serving Salesforce Transit Center
5/5R/7/25
30X/38/38R
41/81X/82X

Source: Fehr & Peers 2019.
Other sources: Streets: City and County of San Francisco 2014.

00056.14 (7-2-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-2
Existing Transit Network Within the Vicinity of the Project Corridor



Notes:

- Market Street is shown wider than map scale for clarity.
- Collision density heatmap methodology: The heatmap is a linear gradient generated by summing the number of collisions on Market Street within 500 feet of any given location. The gradient has a maximum value of 15 collisions. Collision records were not weighted by severity or any other factors.

Legend

- Project Corridor
- BART/Muni Metro Station
- Non-Severe Bicycle Collision
- Fatal / Severe Bicycle Collision
- Collisions within 500 feet (0 – >10)

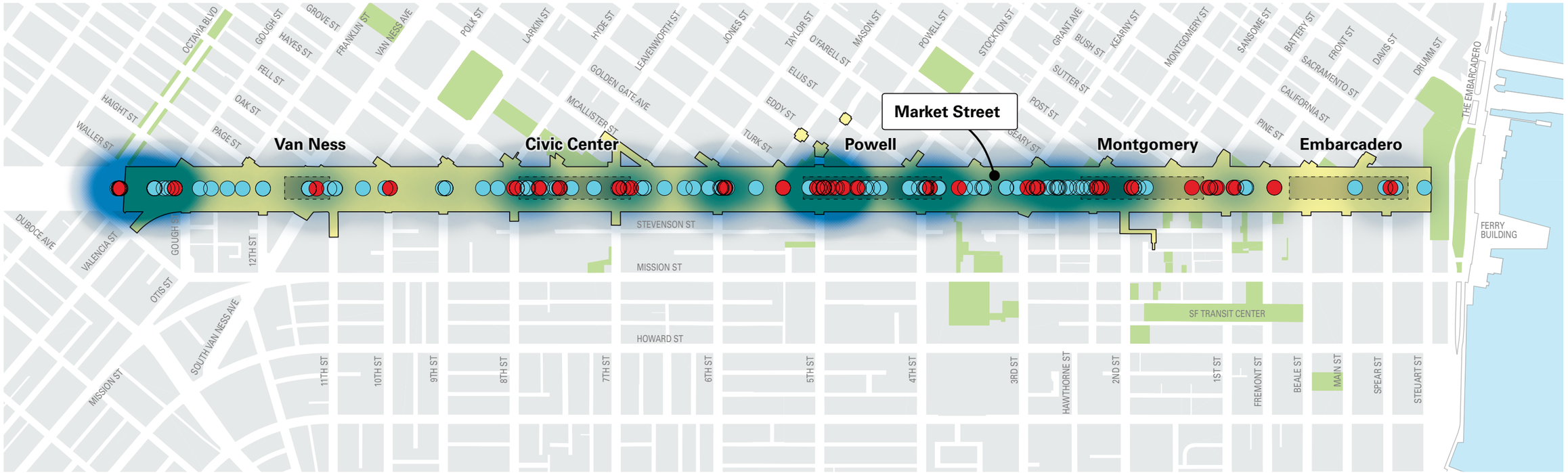
0 500 1,000 Feet

Source: Parisi Transportation Consulting 2019.
Other sources: Streets: City and County of San Francisco 2014.

00056.14 (7-3-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-3
Pedestrian Collisions in the Project Corridor Between 2012 and 2017



Notes:

- Market Street is shown wider than map scale for clarity.
- Collision density heatmap methodology: The heatmap is a linear gradient generated by summing the number of collisions on Market Street within 500 feet of any given location. The gradient has a maximum value of 15 collisions. Collision records were not weighted by severity or any other factors.

Legend

- Project Corridor
- BART / Muni Metro Station
- Non-Severe Bicycle Collision
- Fatal / Severe Bicycle Collision
- Collisions within 500 feet (0 – >15)

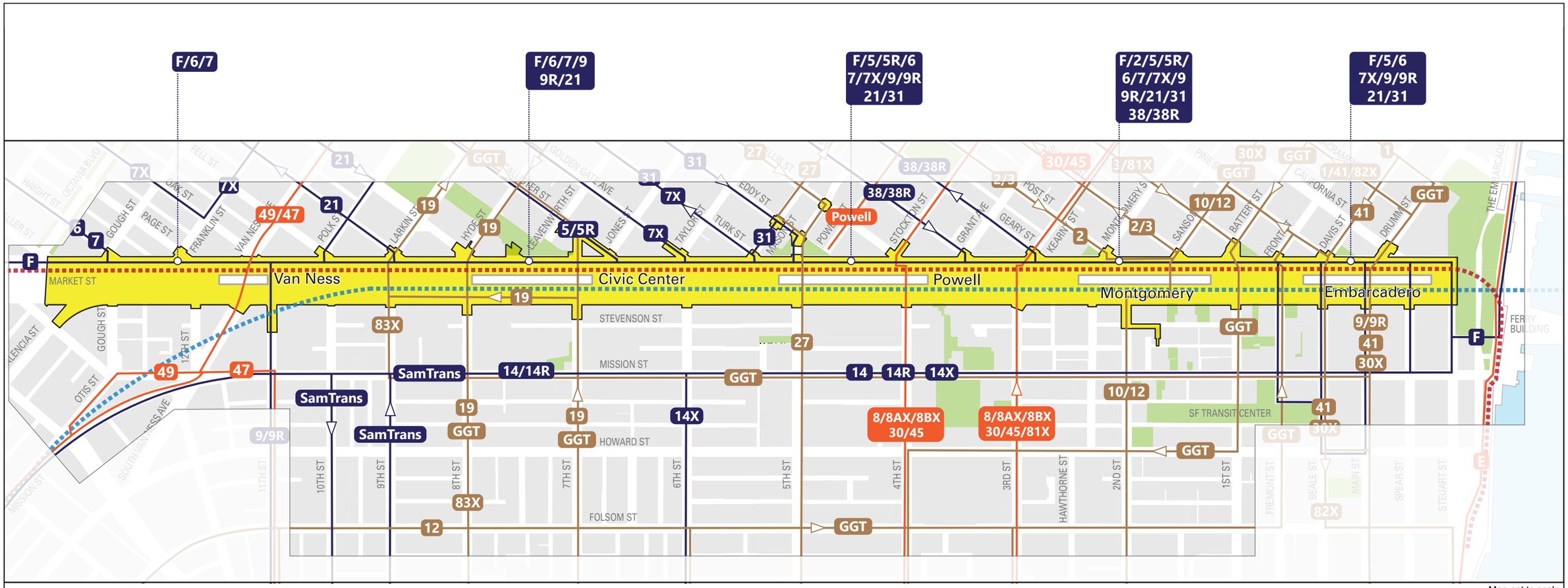
0 500 1,000 Feet

Source: Parisi Transportation Consulting 2019.
Other sources: Streets: City and County of San Francisco 2014.

00056.14 (7-3-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-4
Bicycle Collisions in the Project Corridor Between 2012 and 2017



Notes:

- Market Street is shown wider than map scale for clarity.
- At time of publication, Transbay bus routes are being routed to the Temporary Transbay Terminal rather than to Salesforce Transit Center.
- Some portions of the Cross-Market Street Routes within Transit-Only Lanes operate in mixed flow lanes; however, the majority of these routes operate in transit-only lanes through the transportation study area.
- Routes that do not cross through transportation study area are not shown for clarity (1AX, 1BX, 31AX, 31BX, 38AX, 38BX and 76X).
- Muni routes N and L owls and AC Transit service (routes 800 and 822) also run on Market Street overnight.
- Full Muni map is located in Appendix 7.

Legend

- **Project Corridor**
- **Muni Metro/BART Station**
- **BART Service**
- **SFMTA Muni Metro**
- **Market and Mission Street Routes**
  Analysis Method: VISSIM Microsimulation Model
- **Cross-Market Street Routes within Transit-Only Lanes**
  Analysis Method: Qualitative Assessment
- **Cross-Market Street Routes within Mixed-Flow Lanes**
  Analysis Method: Intersection Operation Analysis Using Synchro and VISSIM Models

Routes serving Ferry Plaza
E/F/6/7X/14 14X/21/31

Routes serving Mission & Main
2/9R/14R

Routes serving Salesforce Transit Center
5/5R/7/25 30X/38/38R 41/81X/82X

Map not to scale

Source: Fehr & Peers 2019.
Other sources: Streets: City and County of San Francisco 2014.

000556.14 (7-2-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-5
Approach for Transit Travel Time Analysis



Notes:

- Market Street is shown wider than map scale for clarity.
- Planned bicycle facilities noted in this figure are planned by MTA and included in the cumulative analysis. In addition, potential bicycle facilities that are currently at a conceptual design stage (and are not approved and funded) are not included in this figure.

Bikeway Definitions:

- Class II Bicycle Facility – Bike Lane
- Class III Bicycle Facility – Bike Route
- Class IV Bicycle Facility – Separated Bikeway

Legend

- Project Corridor
- Existing Class II Bicycle Facility
- Existing Class III Bicycle Facility
- Existing Class IV Bicycle Facility
- Planned Class II Bicycle Facility
- Planned Class IV Bicycle Facility
- Proposed Project Sidewalk-Level Bikeway (Class IV Bicycle Facility)

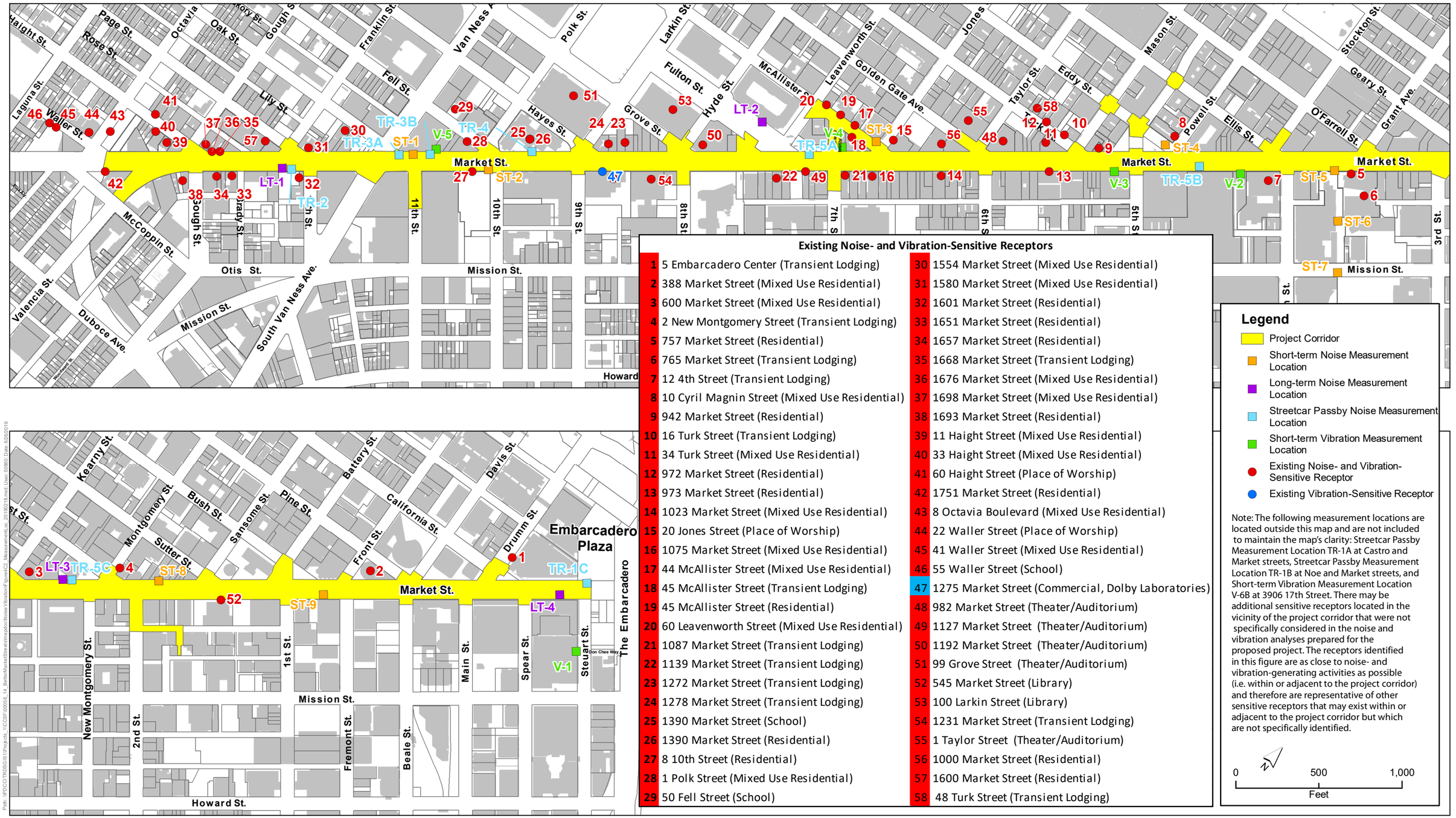
0 500 1,000
Feet

Source: Parisi Transportation Consulting 2019.
Other sources: Streets: City and County of San Francisco 2014

00056.14 (8-19-2019)

Better Market Street Project
Case No. 2014.0012E

(Revised) Figure 4.B-6
Existing, Proposed Project, and Planned Bicycle Facilities in the Vicinity of the Project Corridor



Continued on panel below

Continued on panel above

Existing Noise- and Vibration-Sensitive Receptors

1	5 Embarcadero Center (Transient Lodging)
2	388 Market Street (Mixed Use Residential)
3	600 Market Street (Mixed Use Residential)
4	2 New Montgomery Street (Transient Lodging)
5	757 Market Street (Residential)
6	765 Market Street (Transient Lodging)
7	12 4th Street (Transient Lodging)
8	10 Cyril Magnin Street (Mixed Use Residential)
9	942 Market Street (Residential)
10	16 Turk Street (Transient Lodging)
11	34 Turk Street (Mixed Use Residential)
12	972 Market Street (Residential)
13	973 Market Street (Residential)
14	1023 Market Street (Mixed Use Residential)
15	20 Jones Street (Place of Worship)
16	1075 Market Street (Mixed Use Residential)
17	44 McAllister Street (Mixed Use Residential)
18	45 McAllister Street (Transient Lodging)
19	45 McAllister Street (Residential)
20	60 Leavenworth Street (Mixed Use Residential)
21	1087 Market Street (Transient Lodging)
22	1139 Market Street (Transient Lodging)
23	1272 Market Street (Transient Lodging)
24	1278 Market Street (Transient Lodging)
25	1390 Market Street (School)
26	1390 Market Street (Residential)
27	8 10th Street (Residential)
28	1 Polk Street (Mixed Use Residential)
29	50 Fell Street (School)
30	1554 Market Street (Mixed Use Residential)
31	1580 Market Street (Mixed Use Residential)
32	1601 Market Street (Residential)
33	1651 Market Street (Residential)
34	1657 Market Street (Residential)
35	1668 Market Street (Transient Lodging)
36	1676 Market Street (Mixed Use Residential)
37	1698 Market Street (Mixed Use Residential)
38	1693 Market Street (Residential)
39	11 Haight Street (Mixed Use Residential)
40	33 Haight Street (Mixed Use Residential)
41	60 Haight Street (Place of Worship)
42	1751 Market Street (Residential)
43	8 Octavia Boulevard (Mixed Use Residential)
44	22 Waller Street (Place of Worship)
45	41 Waller Street (Mixed Use Residential)
46	55 Waller Street (School)
47	1275 Market Street (Commercial, Dolby Laboratories)
48	982 Market Street (Theater/Auditorium)
49	1127 Market Street (Theater/Auditorium)
50	1192 Market Street (Theater/Auditorium)
51	99 Grove Street (Theater/Auditorium)
52	545 Market Street (Library)
53	100 Larkin Street (Library)
54	1231 Market Street (Transient Lodging)
55	1 Taylor Street (Theater/Auditorium)
56	1000 Market Street (Residential)
57	1600 Market Street (Residential)
58	48 Turk Street (Transient Lodging)

Legend

- Project Corridor
- Short-term Noise Measurement Location
- Long-term Noise Measurement Location
- Streetcar Passby Noise Measurement Location
- Short-term Vibration Measurement Location
- Existing Noise- and Vibration-Sensitive Receptor
- Existing Vibration-Sensitive Receptor

Note: The following measurement locations are located outside this map and are not included to maintain the map's clarity: Streetcar Passby Measurement Location TR-1A at Castro and Market streets, Streetcar Passby Measurement Location TR-1B at Noe and Market streets, and Short-term Vibration Measurement Location V-6B at 3906 17th Street. There may be additional sensitive receptors located in the vicinity of the project corridor that were not specifically considered in the noise and vibration analyses prepared for the proposed project. The receptors identified in this figure are as close to noise- and vibration-generating activities as possible (i.e. within or adjacent to the project corridor) and therefore are representative of other sensitive receptors that may exist within or adjacent to the project corridor but which are not specifically identified.

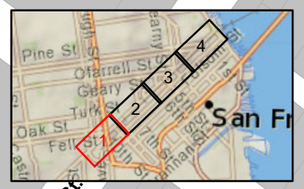
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Feet

Better Market Street Project
Case No. 2014.0012E

Source: Parcels, City and County of San Francisco 2014;
Streets, City and County of San Francisco 2014;
Building Footprints, City and County of San Francisco 2011
Land Use,SF Planning Department, 2018
Wilson Ihrig, Vibro-Acoustic Consultants and ICF, 2018

(Revised) Figure 4.C-2

Noise and Vibration Measurement Locations and Existing Sensitive Receptors in the Vicinity of the Project Corridor



Laguna St.
Waller St.
Octavia Blvd.
Haight St.
Gough St.
Rose St.
Page St.
Lily St.
Franklin St.
Oak St.
Van Ness Ave.
Fell St.
Hickory St.
Dr Tom Waddell Pl.
Hayes St.
Polk St.
Market St.
36
35
37
38
Valencia St.
Elgin Park.
McCoppin St.
Hwy 101
Stevenson St.
Jessie St.
Gough St.
Brady St.
Colton St.
Otis St.
12th St.
South Van Ness Ave.
11th St.
10th St.
Jessie St.
Mission St.
Mission St.

Note: Some of the historic and conservation districts extend outside the boundary of the map. In addition, portions of the Path of Gold, Path of Gold Associated Historic Utility Boxes, Golden Triangle Light Standards, San Francisco Auxiliary Water Supply System, and San Francisco Cable Cars National Historic Landmark that are located outside of the Historic Resources CEQA Study Area are not identified in this map to maintain the map's clarity. The historic districts shown in this figure were determined eligible for listing in local, state, or national inventories. Refer to Section 4.A, Cultural Resources, for more information on each district's eligibility.

Better Market Street Project
Case No. 2014.0012E

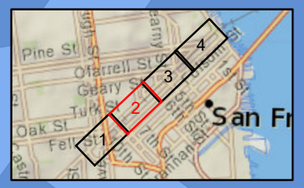
Source: Parcels, City and County of San Francisco 2014;
Streets, City and County of San Francisco 2014;
Building Footprints, City and County of San Francisco 2011;
Historic Resources CEQA Study Area, ICF and San Francisco
Public Works 2018; Historic Districts, San Francisco Planning Department 2018;
Path of Gold and Auxiliary Water Supply System, City and County of San Francisco 2018;
Golden Triangle and POG Associated Utility Boxes, ICF 2019.

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Feet

- Historic Resources CEQA Study Area
- Market Street Cultural Landscape District
- LGBTQ Tenderloin Historic District
- Market Street Masonry Landmark District
- New Montgomery-Mission-2nd Street Conservation District
- Kearny-Market-Mason-Sutter Conservation District
- Uptown Tenderloin National Register Historic District
- Market Street Theatre and Loft National Register Historic District
- Civic Center Landmark District
- CEQA Historic Architectural Resource (see Table A.0 in this Appendix)
- San Francisco Cable Cars National Historic Landmark
- Path of Gold Light Standard
- Path of Gold Associated Historic Utility Box
- Golden Triangle Light Standard
- Shoreline Marker
- Auxiliary Water Supply System Cistern
- Auxiliary Water Supply System Hydrant

(Revised) Figure A
Historic Districts, Conservation Districts, and Historic Architectural Resources within the Historic Resources CEQA Study Area (Sheet 1 of 4)

Path: \\PDCC\TRDSGIS\1Projects_1\CCSP\00056_14_BetterMarketStreets\data\working\31_ArchitecturalResourceMapping_20180524\mxd\Fig_A_Appendix_Mapbook_ArchitecturalResources_20190626.mxd; User: 36038; Date: 7/11/2019



Fulton St.
Grove St.
Larkin St.
Hyde St.
Leavenworth St.
Dale Pl.
Jones St.
Golden Gate Ave.
Taylor St.
Eddy St.
Turk St.
Mason St.
McAllister St.
Market St.
United Nations Plaza
32
33
34
29
30
31
28
27
Stevenson St.
9th St.
8th St.
7th St.
6th St.
Laskie St.
Jessie St.
Mint St.
Mission St.
Minna St.
shburn St.

Path: \\PDCC\TRDSGIS1\Projects_1\CCSF\00056_14_BetterMarketStreets\data\working\31_ArchitecturalResourceMapping_20180524\mxd\Fig_A_Appendix_Mapbook_ArchitecturalResources_20190626.mxd; User: 36038; Date: 7/11/2019

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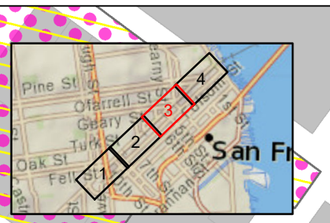
Better Market Street Project
Case No. 2014.0012E

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Historic Resources CEQA Study Area, ICF and San Francisco
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Path of Gold and Auxiliary Water Supply System, City and County of San Francisco 2018;
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Feet

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- Path of Gold Associated Historic Utility Box
- Golden Triangle Light Standard
- Shoreline Marker
- Auxiliary Water Supply System Cistern
- Auxiliary Water Supply System Hydrant

(Revised) Figure A
Historic Districts, Conservation Districts, and Historic Architectural Resources within the Historic Resources CEQA Study Area (Sheet 2 of 4)



Hallidie Plaza

Eddy St.
Mason St.
Cyril Magnin St.
Powell St.
Ellis St.
Stockton St.
O'Farrell St.
Grant Ave.
Geary St.
Maiden Ln.
Kearny St.
Post St.
Montgomery St.
Market St.
5th St.
Mint Plz.
Mint St.
Jessie West St.
Jessie East St.
Mission St.
Minna St.
Stevenson St.
4th St.
Yerba Buena Ln.
3rd St.
Annie St.
New Montgomery St.
2nd St.
Jessie St.

15 16 17 18 19 20 21 22 23 24 25 26

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Path of Gold and Auxiliary Water Supply System, City and County of San Francisco 2018;
Golden Triangle and POG Associated Utility Boxes, ICF 2019.

0 100 200
Feet

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- Shoreline Marker
- Auxiliary Water Supply System Cistern
- Auxiliary Water Supply System Hydrant

(Revised) Figure A
Historic Districts, Conservation Districts, and Historic Architectural Resources within the Historic Resources CEQA Study Area (Sheet 3 of 4)

Path: \\PDCCITRDSGIS1\Projects_1\CCSF\00056_14_BetterMarketStreets\data\working\31_ArchitecturalResourceMapping_20180524\mxd\Fig_A_Appendix_Mapbook_ArchitecturalResources_20190626.mxd; User: 36038; Date: 7/11/2019



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0 100 200
Feet

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- Golden Triangle Light Standard
- Shoreline Marker
- Auxiliary Water Supply System Cistern
- Auxiliary Water Supply System Hydrant

(Revised) Figure A
Historic Districts, Conservation Districts, and Historic Architectural Resources within the Historic Resources CEQA Study Area (Sheet 4 of 4)

Path: \\PDCCITRDSGIS1\Projects_1\CCSF\00056_14_BetterMarketStreets\data\working\31_ArchitecturalResourcesMapping_20180524\mxd\Fig_A_Appendix_Mapbook_ArchiteturalResources_20190626.mxd; User: 36038; Date: 7/11/2019