ENCLOSURE A

TRANSIT EFFECTIVENESS PROJECT, INCLUDING THE SERVICE POLICY FRAMEWORK, CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS: FINDINGS OF FACT, EVALUATION OF MITIGATION MEASURES AND ALTERNATIVES, AND STATEMENT OF OVERRIDING CONSIDERATIONS SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY BOARD OF DIRECTORS

In determining to approve the Transit Effectiveness Project (the "Project") described in Section I, Project Description below, the San Francisco Municipal Transportation Agency Board of Directors (the "SFMTA Board") makes and adopts the following findings of fact and decisions regarding significant impacts, mitigation measures, and alternatives, and adopts the statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act ("CEQA"), California Public Resources Code Sections 21000 et seq. ("CEQA"), particularly Sections 21081 and 21081.5, the Guidelines for Implementation of CEQA ("CEQA Guidelines"), 14 California Code of Regulations Sections 15000 et seq., particularly Sections 15091 through 15093, and Chapter 31 of the San Francisco Administrative Code. These findings comprise **ENCLOSURE A** to the associated Board of Directors Resolution.

This document is organized as follows:

Section I provides a description of the Project proposed for adoption, the environmental review process for the Project, the approval actions to be taken and the location of records;

Section II identifies the impacts found not to be significant that do not require mitigation;

Section III identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures;

Section IV identifies significant impacts that cannot be avoided or reduced to less-than-significant levels and describes any applicable mitigation measures as well as the disposition of the mitigation measures;

Section V evaluates the different Project alternatives and sets forth the economic, legal, social, technological, and other considerations, and incorporates by reference the reasons set forth in Section VI, that support approval of the Project and the rejection of the alternatives, or elements thereof, analyzed as infeasible; and

Section VI presents a statement of overriding considerations setting forth specific reasons in support of the Board's actions to approve the Project despite its significant and unavoidable

environmental impacts and its rejection of the alternatives not incorporated into the Project as infeasible.

The Mitigation Monitoring and Reporting Program ("MMRP") containing the mitigation measures from the Final Environmental Impact Report ("FEIR") that have been proposed for adoption is attached with these findings as **Attachment B** to the associated Board of Directors Resolution**.** The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. The MMRP provides a table setting forth each mitigation measure listed in the FEIR for the Project that is required to reduce or avoid a significant adverse impact and that is made a condition of approval. The MMRP also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in the MMRP.

These findings are based upon substantial evidence in the entire record before the SFMTA Board. The references set forth in these findings to certain pages or sections of the Draft Environmental Impact Report ("DEIR" or "DEIR") or the Responses to Comments document ("RTC") are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings. The DEIR and the Responses to Comments document, together with the Supplemental Service Variants Memorandum dated March 13, 2014 and Errata dated March 27, 2014, comprise the FEIR.

I. APPROVAL OF THE PROJECT

A. Project Description

The Transit Effectiveness Project (TEP) is comprised of a Service Policy Framework, Service Improvements and Service Variants, Service-related Capital Improvements, and Travel Time Reduction Proposals ("TTRPs"), including the Transit Preferential Streets Toolkit. The TEP includes locations throughout the 49-square-mile City and County of San Francisco and is a program comprised of a group of varied projects and proposals. The TEP components will be implemented on public land and within the public right-of-way throughout the City, on property largely under the jurisdiction of the San Francisco Public Works Department and the SFMTA.

The proposals that comprise the TEP vary in the level of detail provided, from highly specific redesigns, including capital improvements, along certain transportation corridors to more conceptual policy recommendations. Accordingly, and pursuant to CEQA Guidelines Sections 15161 and 15168, the FEIR analyzed portions of the TEP at a "project-level" where the amount and type of information available for those components lent itself to a detailed and specific analysis of all potential environmental impacts, and other portions were analyzed at a "program-level" (a more conceptual level) when the details about and current level of design for a

component did not allow for a project-level analysis. In particular, the Service Policy Framework, 5 of the 12 Service-related Capital Improvements, and 6 of the 17 Travel Time Reduction Proposals (TTRPs) were analyzed at a program level.

The description provided here summarizes the project description provided in the FEIR, which, as noted above, is comprised of the DEIR, the RTC, and the Supplemental Service Variant Memorandum. Please see Chapter 2 of the FEIR for a more detailed description of the TEP project.

1. The Service Policy Framework

The Service Policy Framework sets forth transit service delivery objectives that support the SFMTA Strategic Plan goals, and identifies a variety of actions to implement these objectives. The Service Policy Framework will guide how investments are made to the Muni system and is intended to improve system reliability and reduce transit travel time as well as improve customer service. These objectives include the effective allocation of transit resources, the efficient delivery of service, the improvement of service reliability and reduction in transit travel time, and an improvement in customer service. Most importantly, the Policy Framework would organize Muni transit service into four distinct transit categories:

- Rapid Network: These heavily used bus and rail lines form the backbone of the Muni system. With vehicles arriving frequently and transit priority enhancements along the routes, the Rapid network delivers speed and reliability whether customers are heading across town, or simply traveling a few blocks.
- Local Network: Also known as “Grid” routes, these long routes combine with the Rapid network to form an expansive core system that lets customers get to their destinations with no more than a short walk, or a seamless transfer.
- Community Connectors: Also known as “Circulators”, these lightly used bus routes predominantly circulate through San Francisco’s hillside residential neighborhoods, filling in gaps in coverage and connecting customers to the core network.
- Specialized Services: These routes augment existing service during specific times of day to serve a specific need, or serve travel demand related to special events. They include express service, owl service, and special event trips to serve sporting events, large festivals and other San Francisco activities.

2. Service Improvements and Service Variants

The Service Improvements and Service Variants include creation of new transit routes, changes in the alignment of some existing routes, elimination of underused routes or route segments, changes to headways and hours of service, changes to the day of the week for service, and

changes to the mix of local/limited/express service on several routes. The Service Improvements were developed based on a comprehensive evaluation of the overall transit network and public input from community meetings. Specifically, these proposals include:

- Increasing frequency of transit service along heavily used corridors;
- Creating new routes;
- Changing existing route alignments;
- Eliminating underutilized routes or route segments;
- Introducing larger buses on crowded routes;
- Changing the mix of local/limited/express service;
- Expanding limited services.

In addition, the SFMTA included a number of possible variants to these service changes (including recent service variants developed as part of the public outreach process and summarized in the Supplemental Service Variants Memorandum of March 13, 2014) that are proposed as part of the project to allow for flexibility in the phasing and implementation of the Service Improvements. Proposed Service Variants mostly include modifications to portions of some routes or change the type of vehicle used on some routes. In addition, many of the service variants work in concert to improve service along a particular corridor or neighborhood.

3. Service-Related Capital Improvements

Some of the Service Improvements will be supported by Service-related Capital Improvements. The Service-related Capital Improvements include the following: a) Transfer and Terminal Point Improvements, which include installation of overhead wiring and poles; installation of new switches, bypass rails, and/or transit bulbs; expansion of transit zones; and modification of sidewalks at stops to accommodate substantial passenger interchanges and/or to provide for transit vehicle layovers; b) Overhead Wire Expansion capital improvements to support service route changes for electric trolley routes and provide bypass wires to allow trolley coaches to pass one another on existing routes; c) Systemwide Capital Infrastructure projects, such as installation of new accessible platforms to improve system accessibility across the light rail network.

4. Travel Time Reduction Proposals (TTRPs), Using the Transit Preferential Streets (TPS) Toolkit

The Travel Time Reduction Proposals (TTRPs) will implement roadway and transit stop changes to reduce transit delay on the most heavily used routes that make up the backbone of the Muni system, which is referred to as the Rapid Network. The SFMTA has identified a set of 18 standard roadway and traffic engineering elements that can be used to reduce transit travel time

along a transit corridor. Collectively, these tools or elements are called the Transit Preferential Streets Toolkit ("TPS Toolkit"). The TPS Toolkit elements will be applied to 17 Rapid Network transit corridors to improve operation of the Muni system. These elements include:

- Transit Stop Changes: removing or consolidating transit stops; moving stop locations at intersections; adding transit bulbs; adding transit boarding islands; increasing transit stop lengths; converting flag stops to transit zones;
- Land Modifications: establishing transit-only lanes; establishing transit queue jump/bypass lanes; establishing dedicated turn lanes; widening travel lanes through lane reductions;
- Parking and Turn Restrictions: implement turning restrictions; widening travel lanes through parking restrictions; installing traffic signals at uncontrolled and two-way stop-controlled intersections; installing traffic signals at all-way stop-controlled intersections; replacing all-way stop-controls with traffic calming measures at intersections;
- Pedestrian Improvements: installing pedestrian refuge islands; installing pedestrian bulbs; and widening sidewalks.

The TEP proposes to apply the TPS Toolkit to 17 Rapid Network corridors throughout the City. Using the TPS Toolkit, the SFMTA has developed specific corridor designs for 11 of the 17 proposed TTRP corridors. These corridor designs were thus analyzed at a project- level in the FEIR. Project variants were also included as part of these project-level TTRPs. Three of the TTRPs (TTRP.14, TTRP.22 and TTRP.30_1) include variants with different designs on one or more segments of the route. TTRP routes with no design variants at the project level include TTRP.5, TTRP.8x, TTRP.28_1, TTRP.J, TTRP.N, TTRP.9, TTRP.71 and TTRP.L. The SFMTA developed conceptual planning for the remaining 6 TTRP corridors, for which specific corridor designs will be developed at a later stage of the project. These corridor designs were thus analyzed at a programmatic level in the FEIR.

For each of the project-level TTRPs, the SFMTA developed two specific corridor designs comprised of TPS Toolkit elements: a moderate option, referred to as the "TTRP Moderate Alternative;" and an expanded option, referred to as the "TTRP Expanded Alternative." This was done because, although the TEP program was examined in one environmental document in order to understand the full scope of its potential cumulative environmental impacts, the TEP is actually a collection of projects and proposals, which, while related, may be implemented at various times and, in many cases, independently of each other. Thus, these alternatives bracket a range of feasible options that accomplish the SFMTA's objectives for the TEP and describe and analyze the scope of potential physical environmental impacts that would result from implementing a combination of elements from both alternatives. These two alternatives are described and analyzed at an equal level of detail in the FEIR.

Under either alternative, the Service Policy Framework, the Service Improvements, Service Variants, the Service-related Capital Improvements, and the TPS Toolkit as applied to the program-level TTRP corridors would be implemented. The difference between the two alternative projects is that under the TTRP Moderate Alternative, these elements would be implemented in combination with a "moderate" number of TPS Toolkit elements along certain Rapid Network corridors, and, under the TTRP Expanded Alternative, these elements would be implemented in combination with an "expanded" number of TPS Toolkit elements along the same Rapid Network corridors.

Please note that when the DEIR was published, the SFMTA had developed project-level details for only 8 of the 17 TTRP corridors. Subsequently, SFMTA staff developed project-level details for three more of the TTRPs, using the TPS Toolkit. With this additional detail, the TTRP.L, TTRP.9, and TTRP.71_1 Moderate and Expanded Alternatives were analyzed at a project level of detail in the RTC document. These three TTRPs would have the same significant and less-than-significant impacts as the eight project-level TTRPs analyzed in the DEIR and the same mitigation measures would be applicable. Chapter 2 of the RTC document, Project Description Revisions, provides a detailed description of the three additional project-level TTRPs and a summary of their significant and less-than-significant impacts. Chapter 5 of the RTC document, DEIR Revisions, presents the results of the impact analyses of the new three project-level TTRPs as integrated into EIR Chapter 4, Environmental Setting, Impacts, and Mitigation Measures and Chapter 6, Alternatives. Thus, 11 of the 17 TTRPs are analyzed at the project-level in the FEIR. In addition, the descriptions and analyses of TTRP.N and TTRP.5 Moderate and Expanded Alternatives were updated in the FEIR based on minor design modifications to these two project components that occurred after the DEIR was published.

B. Project Objectives

The FEIR discusses several Project objectives identified by the SFMTA as Project Sponsor. The objectives are:

- To improve, to the greatest extent possible, transit speed, reliability and safety by redesigning routes; to reduce travel time along high-ridership corridors by optimizing transit stop locations, implementing traffic engineering changes, and constructing capital infrastructure projects; and to improve safety for pedestrians, bicyclists, and riders at intersections by introducing infrastructure changes (e.g. pedestrian bulbs, transit bulbs, etc.) that lead to safer transit operation.
- To make Muni a more attractive transportation mode and increase transit ridership through both attracting new riders and increasing use by current riders by: serving major origin-destination patterns, such as between regional transit connections and major employment sites; providing direct and efficient service through reduction or elimination

of circuitous route segments; reducing crowding through shifting resources to improve customer comfort and decreasing pass-ups; and redesigning routes to maximize ridership.

- To improve the cost-effectiveness and productivity of transit operations by improving network efficiency and reducing system redundancy by implementing service modifications that include route restructuring, frequency improvements, vehicle-type changes, and hours of service adjustments.
- To implement more fully the City's Transit First Policy by providing clear direction for managing transportation in San Francisco with the goals of providing service to all residents within a quarter mile of 95 percent of the Muni service area and prioritizing transit operations in high-ridership corridors over automobile delay and on-street parking.

C. Environmental Review

The San Francisco Planning Department, as lead agency, prepared a Notice of Preparation ("NOP") and Notice of Public Scoping Meetings on November 9, 2011, and held two Public Scoping Meetings on December 6 and 7, 2011.

The NOP was distributed to the State Clearinghouse and mailed to local, state, and federal agencies and to other interested parties on November 9, 2011, initiating a 30-day public comment period extending through December 9, 2011. A copy of the NOP is available in Appendix 1 in Volume 2 of the EIR. The Public Scoping Meetings were held at the SFMTA offices, One South Van Ness Avenue, in San Francisco. The purpose of the meetings was to present information about the proposed Project to the public and receive public input regarding the scope of the EIR analyses. Attendees were provided an opportunity to voice comments on concerns regarding the project; translators were available for Chinese- and Spanish-speaking attendees if needed.

Oral comments were provided by 21 individuals at the Public Scoping Meetings. During the public review period, 29 public agencies and/or other interested parties submitted comment letters to the Planning Department. Comments raised the following concerns related to physical environmental effects: aesthetics of various transit facilities, including overhead wires; the potential for impacts on archeological resources; air quality impacts related to potential increases in use of private passenger vehicles; the effects on traffic flow and potential for diversions due to new transit and pedestrian bulbs; locations of and distance between transit stops; the potential for shifts in travel modes; concern about loss of parking and loading; pedestrian safety concerns; the environmental review process; suggested use of different

approaches to the transportation impact analysis such as providing estimates of time saved; and requested variations on some service improvements.

The San Francisco Planning Department published an Initial Study on January 23, 2013. The Initial Study was distributed to the State Clearinghouse and mailed to local, state, and federal agencies and to other interested parties on January 23, 2013, initiating a 30-day public comment period extending from January 24, 2013 through February 22, 2013. A copy of the Initial Study is available in Appendix 2 in Volume 2 of the EIR.

The San Francisco Planning Department then prepared a DEIR, which describes both of the Project Alternatives; presents the environmental setting; identifies potential impacts at a program-level or a project-level of detail for both Alternatives; presents mitigation measures for impacts found to be significant or potentially significant; and summarizes the Project Alternatives and their impacts, and compares their impacts and those of the No Project Alternative. In assessing construction and operational impacts of the Project, the DEIR also considers the contribution of the Project impacts to cumulative impacts associated with the Project in combination with other past, present, and reasonably foreseeable future actions with potential for impacts on the same resources.

Each environmental issue presented in the DEIR is analyzed with respect to significance criteria that are based on the San Francisco Planning Department Environmental Planning Division ("EP") guidance regarding the environmental effects to be considered significant. EP guidance is, in turn, based on CEQA Guidelines Appendix G, with some modifications.

The Department published the DEIR on July 10, 2013. The DEIR was circulated to local, state, and federal agencies and to interested organizations and individuals for review and comment beginning on July 11, 2013 for a 67-day public review period, which ended on September 17, 2013. The San Francisco Planning Commission held a duly noticed public hearing to solicit testimony on the DEIR on August 15, 2013. The Planning Department also received written comments on the DEIR, sent through mail, hand-delivered, or by email.

The San Francisco Planning Department then prepared the Responses to Comments document ("RTC"). This document, which provides written response to each comment received on the DEIR that raises environmental issues, was published on March 12, 2014, and includes copies of all of the comments received on the DEIR and responses to those comments. The RTC provided additional updated information and clarification on issues raised by commenters, as well as Planning Department DEIR text changes. The text changes included more detailed analyses, at a project level, for three transit Travel Time Reduction Proposal (TTRPs) for both the Moderate and Expanded Alternatives that had previously been analyzed in the DEIR at a

program level: the TTRP.L (L Taraval), TTRP.9 (9/9L San Bruno), and TTRP.71_1 (71 Haight-Noriega).

On March 13, 2013, the Planning Department published a Supplemental Service Variants Memorandum, which described and analyzed additional service variants developed as part of the SFMTA's public outreach process. The Planning Department concluded that these additional service variants would have the same environmental impacts and require the same mitigation measures as the service variants already described and analyzed in the DEIR, and thus, no additional environmental review was required nor was recirculation of the DEIR required.

The Planning Commission reviewed and considered the FEIR, which is comprised of the DEIR, the RTC document and the Supplemental Service Variants Memorandum, Errata dated March 27, 2014, and all of the supporting information. In certifying the FEIR, the Planning Commission determined that it does not add significant new information to the DEIR that would require recirculation under CEQA because the FEIR contains no information revealing (1) any new significant environmental impact that would result from the project or from a new mitigation measure proposed to be implemented, (2) any substantial increase in the severity of a previously identified environmental impact, (3) any feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but that was rejected by the project's proponents, or (4) that the DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. This SFMTA Board concurs in this determination.

D. Approval Actions

1. Planning Commission Action

On March 27, 2014 the Planning Commission certified the FEIR.

2. San Francisco Municipal Transportation Agency Board of Directors Actions

- Approval of the Transit Effectiveness Project, including the Service Policy Framework
- Approval of the implementation of certain parking and traffic measures in accordance with Section 201(c) of the Transportation Code

3. San Francisco Board of Supervisors Actions

The Planning Commission's certification of the FEIR may be appealed to the Board of Supervisors. If appealed, the Board of Supervisors will determine whether to uphold the

certification or to grant the appeal and remand the FEIR to the Planning Department for further review.

Additional actions that may be taken by the Board of Supervisors are:

- Review and approval of system changes related to any route abandonments.
- Approval of sidewalk changes, upon referral from the Department of Public Works.

4. Other San Francisco Agency Actions

- Approval by the Department of Public Works of sidewalk legislation and construction period encroachment permits.
- Approval by the San Francisco Recreation and Park Commission of property encroachments, if required.
- Approval by the San Francisco Planning Department of any required General Plan Referrals

5. Other—Local, State, and Federal Agencies

Implementation of the Project will involve consultation with, or required approvals by, other local, state and federal regulatory agencies, including, but not limited to, the following:

- The Transportation Advisory Staff Committee ("TASC"): Coordination of all roadway and transit changes.
- City of Daly City: Approval of installation of a traffic signal and transit bulb in Daly City.
- California Department of Transportation ("Caltrans") District 4: Approval of temporary construction street encroachment permits within Caltrans rights-of-way.

To the extent that the identified mitigation measures require consultation with or approval by these other agencies, the SFMTA Board urges these agencies to assist in implementing, coordinating, or approving the mitigation measures, as appropriate to the particular measure.

6. Location and Custodian of Records

The DEIR and all documents referenced in or relied on by the Draft and FEIR, the DEIR public hearing transcript, a copy of all letters regarding the EIR received during the Notice of Preparation and DEIR public review periods, the administrative record, the Responses to Comments document, and the Supplemental Service Variants Memorandum, and background documentation for the FEIR are located at the Planning Department, 1650 Mission Street, San Francisco. (Planning Department Case File No. 2011.0558E.) The Planning Commission Secretary, Jonas Ionin, is the custodian of records for the Planning Department and the Planning Commission.

All information, including written materials and testimony, concerning approval of the Project and adoption of these findings, presented to the SFMTA Board or incorporated into reports presented to the SFMTA Board, are located at the SFMTA offices at One South Van Ness Avenue, 7th floor, San Francisco.

All files have been available to the SFMTA Board and the public for review in considering these findings and whether to approve the Project.

E. Findings about Significant Environmental Impacts and Mitigation Measures

The following Sections II, III, and IV set out the SFMTA Board of Directors' findings about the FEIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the SFMTA Board regarding the environmental impacts of the Project and the mitigation measures included as part of the FEIR and adopted by the SFMTA Board as part of the Project. To avoid duplication and redundancy, and because the SFMTA Board agrees with, and hereby adopts, the conclusions in the FEIR, these findings will not repeat the analysis and conclusions in the FEIR, but instead incorporate them by reference and rely upon them as substantial evidence supporting these findings.

In making these findings, the SFMTA Board has considered the opinions of SFMTA staff and other City staff and experts, other agencies, and members of the public. The SFMTA Board finds that the determination of significance thresholds is a judgment decision within the discretion of the SFMTA and the City and County of San Francisco; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the SFMTA and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

These findings do not attempt to describe the full analysis of each environmental impact contained in the FEIR. Instead, a full explanation of these environmental findings and conclusions can be found in the FEIR, which includes its Initial Study presented in EIR Appendix 2, and these findings hereby incorporate by reference the discussion and analysis in the FEIR supporting the determinations regarding the Project impacts and mitigation measures designed to address those impacts. In making these findings, the SFMTA Board of Directors ratifies, adopts, and incorporates in these findings the determinations and conclusions of the FEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations are specifically and expressly modified by these findings.

As set forth below, the SFMTA Board adopts and incorporates the mitigation measures set forth in the FEIR and the attached MMRP to substantially lessen or avoid the significant impacts of the Project. The SFMTA Board intends to adopt all the mitigation measures proposed in the FEIR. Accordingly, in the event a mitigation measure identified in the FEIR has inadvertently been omitted in these findings or the MMRP, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measures in the FEIR due to a clerical error, the language of the policies and implementation measures as set forth in the FEIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the FEIR.

In the Sections II, III and IV below, the same findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding dozens of times to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the SFMTA Board rejecting the conclusions of the FEIR or the mitigation measures identified in the FEIR for the Project.

The findings below include findings relevant to the TTRP Moderate Alternative and to the TTRP Expanded Alternative. Under either alternative, the FEIR assumed that the Service Policy Framework, the Service Improvements, Service Variants, the Service-related Capital Improvements, and the TPS Toolkit as applied to the program-level TTRP corridors would be implemented. It is not known at this time which specific alternative, or mixture of proposals from the two alternatives, will be ultimately approved by the SFMTA Board for each TTRP corridor. It is likely that, over time, a mix of the proposals described in the TTRP Moderate Alternative and the TTRP Expanded Alternative will be adopted and implemented along the various corridors. Because of this, in taking this action, the SFMTA Board makes the following findings regarding the potential for environmental impacts and required mitigation measures for both the TTRP Moderate Alternative and the TTRP Expanded Alternative, as each are described in the FEIR.

II. IMPACTS FOUND NOT TO BE SIGNIFICANT AND THUS DO NOT REQUIRE MITIGATION

Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3) and 15091). Based on the evidence in the whole record of this proceeding, the Board finds that implementation of the Proposed Project will not result in any significant impacts in the following areas and that these impact areas therefore do not require mitigation:

Land Use and Land Use Planning

- Impacts LU-1, LU-2, and LU-3: The proposed Project would not physically divide an established community, would not conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, or have a substantial adverse impact on the existing character of the vicinity.
- Impact C-LU-1: The proposed Project, in combination with other past, present, or reasonably foreseeable future projects in the project vicinity, would not have a cumulatively considerable contribution to a significant cumulative land use or land use planning impact.

Aesthetics

- Impacts AE-1 and AE-2: The proposed Project would not have a substantial adverse effect on a scenic vista or on scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting.
- Impact AE-3: The proposed Project would not degrade existing visual character or quality of the project sites and surroundings.
- Impact AE-4: The proposed Project would not create a new source of substantial light or glare that would have a substantial adverse effect on day or nighttime views.
- Impact C-AE-1: The proposed Project, in combination with other past, present, or reasonably foreseeable future projects would not have a cumulatively considerable contribution to a significant cumulative aesthetics impact.

Population and Housing

- Impact PH-1: The proposed Project would not induce substantial population growth either directly or indirectly.
- Impact PH-2: The proposed Project would not displace any existing housing units or create any demand for additional housing, or displace substantial numbers of people, necessitating the construction of replacement housing.
- Impact C-PH-1: The proposed Project in combination with other past, present, or reasonably foreseeable future projects would not result in a cumulatively considerable contribution to significant cumulative impacts on population or housing.

Cultural and Paleontological Resources

- Impact CP-1: The proposed Project would not cause a substantial adverse change in the significance of an historic architectural resource.
- Impact C-CP-1: The proposed Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable contribution to significant cumulative impacts on cultural resources or archaeological resources.

Transportation and Circulation

- The proposed Project would not result in changes to air traffic patterns because the project site is not located within an airport land use plan area or in the vicinity of a private airstrip.
- The proposed Project would not substantially increase transportation hazards due to a design feature or incompatible uses.
- Impact TR-1: Implementation of the Service Policy Framework and the TEP project components would not result in construction-related transportation impacts because of their temporary and limited duration.
- Impact TR-2: Implementation of the Service Policy Framework Objectives A through D would not result in significant impacts to local or regional transit, traffic operations, pedestrians and bicyclists, loading, emergency vehicle access, or parking.
- Impact TR-4: Implementation of the Policy Framework Objective A, Actions A.1, A.2 and A.4, Objective B, Actions B.1 through B.4, Objective C, Actions C.1 and C.2, and Objective D, Actions D.1 through D.4 would not result in significant traffic impacts.
- Impact TR-6: Implementation of the Policy Framework Objective A, Actions A.1, A.2 and A.4, Objective B, Actions B.1 through B.4, Objective C, Actions C.1 and C.2, and Objective D, Actions D.1 through D.4 would not result in significant loading impacts.
- Impact TR-7: Implementation of all of the TPS Toolkit categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, Traffic Signal and Stop Sign Changes, and Pedestrian Improvements, would not result in significant impacts to local or regional transit, pedestrians and bicycles, emergency vehicle access, or parking.
- Impact TR-9: Implementation of the following TPS Toolkit categories: Transit Stop Changes, Parking and Turn Restrictions, and Traffic Signal and Stop Sign Changes, would not result in significant traffic impacts.
- Impact TR-11: Implementation of TPS Toolkit element category Traffic Signal and Stop Sign Changes would not result in significant loading impacts.
- Impact TR-12: Implementation of program-level Service-related Capital Improvements projects (TTPI.2, TTPI.3, TTPI.4, OWE.6, and SCI.1) would not result in significant impacts to local or regional transit, traffic operations, pedestrians and bicyclists, loading, emergency vehicle access, or parking.
- Impact TR-13: Implementation of any of the TPS Toolkit categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, Traffic Signal and Stop Sign Changes, and Pedestrian Improvements along the nine program-level TTRP corridors would not result in significant impacts to local or regional transit, pedestrians and bicyclists, emergency vehicle access, or parking.
- Impact TR-15: Implementation of any TPS Toolkit elements within the following categories: Transit Stop Changes, Parking and Turn Restrictions, and Traffic Signal and Stop Sign Changes, along the program-level TTRP corridors would not result in significant impacts on traffic operations.

- Impact TR-17: Implementation of any of the TPS Toolkit elements within the category Traffic Signal and Stop Sign Changes along the program level TTRP corridors would not result in significant loading impacts.
- Impact TR-18: Implementation of the Service Improvements or Service Variants would not result in significant impacts to local or regional transit, traffic operations, pedestrians and bicyclists, loading, emergency vehicle access, or parking.
- Impact TR-19: Implementation of the project-level Service-related Capital Improvement projects (TTPI.2, OWE.1, OWE.1 Variant, OWE.2, OWE.3, OWE.4, OWE.5, and SCI.2) would not result in significant impacts to local or regional transit, traffic operations, pedestrians and bicyclists, loading, emergency vehicle access, or parking.
- Impact TR-20: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would not result in significant impacts to local or regional transit.
- Impact TR-21: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1 would not result in significant impacts to local or regional transit.
- Impact TR-22: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would have less-than-significant traffic impacts at 78 study intersections.
- Impact TR-23: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.28_1, or TTRP.71_1 would have less-than-significant traffic impacts at 40 study intersections.
- Impact TR-25: Implementation of the project-level TTRP.14 Expanded Alternative would have less-than-significant traffic impacts at 19 study intersections under Existing plus Service Improvements and the TTRP.14 Expanded Alternative conditions.
- Impact TR-29: Implementation of the project-level TTRP.22_1 Expanded Alternative would have less-than-significant traffic impacts at six study intersections that would operate at level of service (“LOS”) D or better under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative conditions.
- Impact TR-33: Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 1 would have less-than-significant traffic impacts at six study intersections that would operate at LOS D or better under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 conditions.
- Impact TR-37: Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 2 would have less-than-significant traffic impacts at six study intersections that would operate at LOS D or better under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 conditions.
- Impact TR-39: Implementation of the project-level TTRP.30_1 Expanded Alternative would have less-than-significant traffic impacts at nine study intersections that would

operate at LOS D or better under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative conditions.

- Impact TR-41: Implementation of the project-level TTRP.30_1 Expanded Alternative Variant 1 would have less-than-significant traffic impacts at nine study intersections that would operate at LOS D or better under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 1 conditions.
- Impact TR-43: Implementation of the project-level TTRP.30_1 Expanded Alternative Variant 2 would have less-than-significant traffic impacts at nine study intersections that would operate at LOS D or better under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 2 conditions.
- Impact TR-44: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would not result in significant impacts to pedestrians and bicyclists.
- Impact TR-45: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1 Expanded Alternative, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1 would not result in significant impacts to pedestrians and bicyclists.
- Impact TR-46: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.22_1, TTRP.28_1, or TTRP.71_1 would not result in significant loading impacts.
- Impact TR-47: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, or TTRP.71_1 would not result in significant loading impacts.
- Impact TR-55: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would not result in significant impacts on emergency vehicle access.
- Impact TR-56: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1 would not result in significant impacts on emergency vehicle access.
- Impact TR-57: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would not result in a significant parking impact.
- Impact TR-58: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1 would not result in a significant parking impact.

- Impact C-TR-4: Implementation of the Service Improvements or Service Variants, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to ridership at the regional transit screenlines on AC Transit, Caltrain, Golden Gate Transit, SamTrans, and other regional ferry service under 2035 Cumulative plus Service Improvements only conditions.
- Impact C-TR-5: The TPS Toolkit elements as applied in the program-level TTRP corridors, and Service Improvements with the TTRP Moderate Alternative would not contribute considerably to ridership at the regional transit screenlines on AC Transit, Caltrain, Golden Gate Transit, SamTrans, and other regional ferry service under 2035 Cumulative plus Service Improvements and the TTRP Moderate Alternative conditions.
- Impact C-TR-6: The TPS Toolkit elements as applied in program-level TTRP corridors, and Service Improvements with the TTRP Expanded Alternative, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to ridership at the regional transit screenlines on AC Transit, Caltrain, Golden Gate Transit, SamTrans, and other regional ferry service under 2035 Cumulative plus Service Improvements and the TTRP Expanded Alternative conditions.
- Impact C-TR-8: Implementation of the Service Policy Framework Objective A, Actions A.1, A.2 and A.4, Objective B, Actions B.1 through B.4, Objective C, Actions C.1 and C.2, and Objective D, Actions D.1 through D.4 and any of the TPS Toolkit elements within categories: Transit Stop Changes, Parking and Turn Restrictions, and Traffic Signal and Stop Sign Changes, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant traffic impacts under 2035 Cumulative plus Service Improvements and the TTRP Moderate Alternative conditions, and therefore would not contribute to any significant cumulative traffic impacts.
- Impact C-TR-10: Implementation of the Service Policy Framework Objective A, Actions A.1, A.2 and A.4, Objective B, Actions B.1 through B.4, Objective C, Actions C.1 and C.2, and Objective D, Actions D.1 through D.4 and any of the TPS Toolkit elements within categories: Transit Stop Changes, Parking and Turn Restrictions, and Traffic Signal and Stop Sign Changes, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant traffic impacts under 2035 Cumulative plus Service Improvements and the TTRP Expanded Alternative conditions, and therefore would not contribute to any significant cumulative traffic impacts.
- Impact C-TR-11: Implementation of the Service Improvements or Service Variants, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant traffic impacts under 2035 Cumulative plus Service Improvements only conditions, and therefore would not contribute to any significant cumulative traffic impacts.
- Impact C-TR-12: Implementation of the TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1, TTRP.14 Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1 would have less-than-significant traffic impacts under 2035 Cumulative plus Service Improvements and the TTRP Moderate Alternative conditions, and therefore would not contribute to any significant cumulative traffic impacts.

- Impact C-TR-38: Implementation of the TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to significant cumulative traffic impacts at 16 study intersections that would operate at LOS E or LOS F under 2035 Cumulative plus Service Improvements and the TTRP Expanded Alternative conditions.
- Impact C-TR-39: Implementation of the TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1 would not result in significant cumulative traffic impacts at 48 study intersections that would operate at LOS D or better under 2035 Cumulative plus Service Improvements and the TTRP Expanded Alternative conditions.
- Impact C-TR-40: Implementation of the Service Policy Framework and any of the TPS Toolkit elements within categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, and Traffic Signal and Stop Sign Changes, and Pedestrian Improvements as applied in program-level TTRP corridors, Service Improvements or Service Variants, and Service-related Capital Improvements, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative pedestrian and bicycle impacts.
- Impact C-TR-41: Implementation of the Service Improvements or Service Variants and the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14 Variant 1 and TTRP Variant 2, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative pedestrian and bicycle impacts.
- Impact C-TR-42: Implementation of the Service Improvements or Service Variants and the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative pedestrian and bicycle impacts.
- Impact C-TR-46: Implementation of the Policy Framework Objective A, Actions A.1, A.2 and A.4, Objective B, Actions B.1 through B.4, Objective C, Actions C.1 and C.2, and Objective D, Actions D.1 through D.4, TPS Toolkit Category Traffic Signal and Stop Sign Changes as applied in program-level TTRP corridors, Service Improvements or Service Variants, and Service-related Capital Improvements, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative loading impacts.
- Impact C-TR-47: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.22_1, TTRP.28_1, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative loading impacts.

- Impact C-TR-48: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.22_1, TTRP.22_1 Variant 1, TTRP.22_1 Variant 2, TTRP.28_1, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative loading impacts.
- Impact C-TR-50: Implementation of the Service Policy Framework Objective A, Actions A.1, A.2, and A.4, Objective B all actions, Objective C, Actions C.1 and C.2, and Objective D all actions, and any of the TPS Toolkit elements within categories: Transit Stop Changes and Traffic Signal and Stop Sign Changes, and Pedestrian Improvements as applied in program-level TTRP corridors, Service Improvements, and Service-related Capital Improvements, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative parking impacts.
- Impact C-TR-51: Implementation of the project-level TTRP Moderate Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.22_1, TTRP.28_1, TTRP.30_1, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative parking impacts.
- Impact C-TR-53: Implementation of the project-level TTRP Expanded Alternative for the TTRP.J, TTRP.L, TTRP.N, TTRP.5, TTRP.8X, TTRP.9, TTRP.14, TTRP.28_1, TTRP.30_1, TTRP.30_1 Variant 1, TTRP.30_1 Variant 2, or TTRP.71_1, in combination with past, present and reasonably foreseeable development in San Francisco, would have less-than-significant cumulative parking impacts.

Noise and Vibration

- The proposed Project is not located within an airport land use plan area, within two miles of a public or public use airport, or in the vicinity of a private airstrip, and therefore would not expose people residing or working in the project area to excessive noise levels.
- Impact NO-1: Construction activities, occurring indirectly as a result of the proposed Service Policy Framework, and as proposed under the TEP for the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants would not result in a substantial temporary or periodic increase in noise levels above existing ambient conditions.
- Impact NO-2: Construction activities, occurring indirectly as a result of the proposed Service Policy Framework, and as proposed under the TEP for the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants would not expose persons and structures to excessive temporary ground-borne vibration or ground-borne noise levels.
- Impact NO-3: The proposed Service Policy Framework and operation of the Service Improvements and Service Variants would not result in a substantial increase in permanent noise levels along affected transit routes above existing ambient conditions.
- Impact NO-4: The proposed Service Policy Framework and the Service Improvements and Service Variants proposed by the TEP would not expose people to or generate excessive ground-borne vibration or noise levels along affected transit routes.

- Impact C-NO-1: The Service Policy Framework and the construction and operation of the proposed TEP, including Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants, in combination with other past, present, or reasonably foreseeable future projects, would not increase construction noise and vibration or operational noise and vibration levels along affected transit routes substantially above existing ambient conditions.

Air Quality

- The proposed Project would not result in significant odor impacts.
- Impact AQ-1: The Service Policy Framework and construction activities proposed under the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants would not result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation; nor would it result in a cumulatively considerable net increase of criteria air pollutants, for which the project region is in nonattainment under an applicable ambient air quality standard.
- Impact AQ-2: The Service Policy Framework and construction activities proposed under the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants would not generate emissions of $PM_{2.5}$ and toxic air contaminants, including diesel particulate matter, at levels that would expose sensitive receptors to substantial pollutant concentrations.
- Impact AQ-3: The Service Policy Framework and the proposed project-level Service Improvements and Service Variants in combination with the TTRPs and TTRP Variants would not result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation nor result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under an applicable ambient air quality standard.
- Impact AQ-4: The Service Policy Framework and proposed project-level Service Improvements and Service Variants would not generate emissions of $PM_{2.5}$ and toxic air contaminants, including diesel particulate matter, at levels that would expose sensitive receptors to substantial pollutant concentrations.
- Impact AQ-5: The Service Policy Framework, and construction and operation of the proposed TEP, including the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants, would not conflict with or obstruct implementation of the 2010 Clean Air Plan, the Bay Area's applicable air quality plan.
- Impact C-AQ-1: The Service Policy Framework, and construction and operation of the proposed TEP, including the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants, in combination with past, present and reasonably foreseeable future projects, would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under applicable ambient air quality standards.
- Impact C-AQ-2: The Service Policy Framework, and construction and operation of the proposed TEP, including the Service Improvements and Service Variants, Service-related Capital Improvements, and TTRPs and TTRP Variants, in combination with past,

present and reasonably foreseeable future projects, would not generate emissions of $PM_{2.5}$ and toxic air contaminants, including diesel particulate matter, at levels that would expose sensitive receptors to substantial pollutant concentrations.

Greenhouse Gas Emissions

- Impact C-GG-1: The proposed Project would generate greenhouse gas emissions, but not in levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.

Wind and Shadow

- Impact WS-1: The proposed Project would not alter winds in a manner that would substantially affect public areas.
- Impact WS-2: The proposed Project would not create new shadow that substantially affects outdoor recreation facilities or other public areas.

Recreation

- Impact RE-1, RE-3: The proposed Project would not result in the increased use of existing neighborhood or regional parks or other recreation facilities such that substantial physical deterioration would occur or be accelerated, nor result in the degradation of recreational resources.
- Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.
- Impact C-RE-1: The proposed project in combination with other past, present, or reasonably foreseeable future projects would not result in a cumulatively considerable contribution to significant cumulative impacts on recreation.

Utilities and Services Systems

- Impact UT-1, UT-2: The proposed Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board; result in a determination that the wastewater treatment provider has inadequate capacity to serve the project; or require or result in the construction of new or the expansion of existing water, wastewater treatment or stormwater drainage facilities
- Impact UT-3: The proposed Project would have sufficient water supply available from existing entitlements and would not require new or expanded water supply resources or entitlements.
- Impact UT-4: The proposed Project would increase the amount of solid waste generated on the project sites, but would be adequately served by the City's landfill and would comply with federal, state and local statutes and regulations related to solid waste.

- Impact C-UT-1: The proposed Project in combination with other past, present, or reasonably foreseeable future projects would not result in a cumulatively considerable contribution to significant cumulative impacts on utilities and service systems.

Public Services

- Impact PS-1: The proposed Project would not result in substantial adverse physical impacts associated with the provision of police protection, fire protection, schools, and library services in order to maintain acceptable service ratios, response times, or other performance objectives.
- Impact C-PS-1: The proposed Project would not result in a cumulatively considerable contribution to significant impacts on police services, fire protection, emergency services, schools, or libraries such that new or altered facilities are required.

Biological Resources

- Impact BI-1, B-2, BI-3: The proposed Project would not affect any special status species, riparian habitat or other sensitive natural community, or federally protected wetlands; would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors; and would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Impact C-BI-4: The proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on biological resources.

Geology and Soils

- Impact GE-1: Implementation of the proposed Project would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic ground-shaking, liquefaction, lateral spreading, or landslides.
- Impact GE-2: The implementation of the proposed Project would not result in substantial erosion, loss of topsoil, or adverse impacts to topographical features.
- Impact GE-3: The implementation of the proposed Project would not locate sensitive land uses on geologic units or soils that are expansive, unstable, or that would become unstable as a result of future uses, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- Impact C-GE-1: The proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on geology and soils.

Hydrology and Water Quality

- Impact HY-1: The implementation of the proposed Project would not violate water quality or waste discharge standards, exceed the capacity of existing drainage systems,

provide additional sources of polluted runoff, or otherwise substantially degrade water quality.

- Impact HY-2, HY-3: The proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and would not substantially alter existing drainage patterns in a manner that would result in substantial erosion or siltation.
- Impact HY-4, HY-5: The implementation of the proposed Project would not expose people or structures to substantial risk of loss due to flooding, or to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow, or as a result of the failure of a reservoir.
- Impact C-HY-1: The proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on water quality and hydrology.

Hazards and Hazardous Materials

- Impact HZ-3: Implementation of the proposed Project would not create a significant hazard to the public or the environment by location on a hazardous materials site.
- Impact HZ-4: Implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving fires, and would not interfere with the implementation of an emergency response plan.
- Impact C-HZ-1: The proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts with respect to hazards and hazardous materials.

Mineral and Energy Resources

- Impact ME-1: The proposed Project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site,
- Impact ME-2: The proposed Project would not result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner.
- Impact C-ME-1: The proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on mineral and energy resources.

Agriculture and Forest Resources

- Impact AF-1: The proposed Project would not have a substantial adverse effect on agriculture or forest resources.

Growth-Inducing Impacts

- Impact GR-1: Implementation of the Service Policy Framework and the TEP project components would not result in growth inducing impacts.

III. FINDINGS OF POTENTIALLY SIGNIFICANT IMPACTS THAT CAN BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH MITIGATION AND THE DISPOSITION OF THE MITIGATION MEASURES

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potential significant impacts if such measures are feasible (unless mitigation to such levels is achieved through adoption of a project alternative). The findings in this Section III and in Section IV concern mitigation measures set forth in the EIR. These findings discuss mitigation measures as identified in the FEIR and recommended for adoption by the SFMTA Board of Directors. The full text of the mitigation measures is contained in the FEIR and in **Attachment B**, the Mitigation Monitoring and Reporting Program.

The SFMTA Board adopts all of the mitigation measures identified in the FEIR. The SFMTA Board finds that all of the mitigation measures are appropriate and feasible. Based on the analysis contained in the FEIR, other considerations in the record, and the significance thresholds in the EIR, the SFMTA Board finds that the impacts identified in this Section III will be reduced to a less-than-significant level through implementation of the mitigation measures contained in the FEIR, imposed as conditions of approval, and set forth in **Attachment B**.

Cultural and Paleontological Resources

- Impact CP-2: The proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5.

There is a reasonable presumption that construction of the proposed program-level and project-level TEP components will not require an excavation depth and/ or be located in an area where the potential for effect on archaeological resources is likely. However, to avoid potential adverse impacts on archaeological resources where the presence of the resource cannot be known, foreseen, or predicted, the Accidental Discovery Archaeological Mitigation Measure will be implemented for all TEP components. This mitigation measure requires that upon accidental discovery of an archaeological resource during construction (including human remains), the appropriate treatment of the resource will be carried out by a qualified archaeological consultant.

Mitigation Measure M-CR-2a: Accidental Discovery of Archeological Resources.

The construction of the following four TEP components has the potential to adversely affect archaeological resources: TTRP.22_2; TTRP.9; and two Service-related Capital Improvements, OWE.1 New Overhead Wiring – Reroute 33 Stanyan onto Valencia Street, and SC1.2 Sansome Street Contraflow Lane. TTRP.9 includes a segment of Bayshore Boulevard, and TTRP. 22_2 includes a segment of Richardson Avenue. These segments occur along the historic shoreline,

estuary, tidal marsh or lagoon, or watercourse and such sites may include prehistoric archaeological resources. The installation of overhead wire support poles and duct banks along a two-block portion of Valencia Street (OWE.1) will be constructed in the Mission Dolores area in which there is a potential for significant archaeological resources from the Hispanic Period. The installation of traffic mast arms along a three-block portion of Sansome Street (SCI.2) will occur in an area with the potential for impacts to archaeological resources from the Yerba Buena period. Construction in these areas could result in significant impacts on archaeological resources if the Archaeological Monitoring mitigation measure is not implemented. Implementation of the Archaeological Monitoring mitigation measure requires review by the Planning Department archeologist once engineering design details are known. If determined necessary by the Planning Department, the SFMTA would be required to hire an archaeological consultant to be present and monitor construction activities associated with these four TEP components (as necessary), redirect construction activities if an intact archaeological deposit is encountered, evaluate the deposit, and either re-design the project or implement a data recovery program.

Mitigation Measure M-CR-2b: Archaeological Monitoring

- Impact CP-3: The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Given the shallow excavation depths of TEP construction activities and previous ground disturbance that is common within the public right-of-way, there is a low probability of encountering significant paleontological resources in the course of project construction. However, the presence of shallow paleontological resources within areas of excavation under the proposed Project cannot be conclusively ruled out. Disturbance of paleontological resources could impair the ability of paleontological resources to yield important scientific information. The Paleontological Resources Accidental Discovery mitigation measure will apply in the event that any indication of a paleontological resource is encountered in the course of TEP project construction activities, and if the resource may be important, a qualified paleontological consultant will be retained to design and implement a sampling and data recovery program.

Mitigation Measure M-CP-3: Paleontological Resources Accidental Discovery

Hazards and Hazardous Materials

- Impact HZ-1: Implementation of the proposed Project would not create a significant hazard through routine transport, use, disposal, handling, or emission of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The use, storage, and disposal of hazardous materials is regulated by numerous local, state, and federal laws and regulations. Excavation in the public-right-of-way is regulated under the Public Works Code, which states that excavation contractors are subject to all applicable hazardous material guidelines for disposal, handling, release, and treatment of hazardous material; site remediation; and worker safety and training. Additionally, Article 20 of the Public Works Code and Article 22A of the San Francisco Health Code require environmental investigation at construction sites where contaminated fill materials may be encountered. The SFMTA and construction contractors will adhere to these regulations. However, to ensure that potential significant impacts from release of hazardous materials during construction are reduced to less-than-significant levels, the SFMTA and construction contractors are required to implement the Hazardous Materials Soil Testing mitigation measure, which requires that soil to be removed from an excavation area and not encapsulated within the same area be tested and, if found to contain hazardous materials, be transported and disposed of in compliance with local, state and federal requirements.

Mitigation Measure M-HZ-1: Hazardous Materials Soil Testing

- Impact HZ-2: Implementation of the proposed project would not substantially emit hazardous emissions or acutely hazardous materials near schools.

To ensure that construction and operation of the program- and project-level TEP components will not result in significant hazardous materials emissions or the handling of acutely hazardous materials near schools, the SFMTA and construction contractors are required to implement the Hazardous Materials Soil Testing mitigation measure listed above.

Mitigation Measure M-HZ-1: Hazardous Materials Soil Testing

IV. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL

Based on substantial evidence in the whole record of these proceedings, the SFMTA Board of Directors finds that, where feasible, changes or alterations have been required, or incorporated into, the Project to reduce the significant environmental impacts as identified in the FEIR. The SFMTA Board finds that the mitigation measures in the FEIR and described below are appropriate, and that changes have been required in, or incorporated into, the Project that, pursuant to Public Resources Code Section 21002 and CEQA Guidelines Section 15091, may substantially lessen, but do not avoid (i.e., reduce to less-than-significant levels), the potentially significant environmental effects associated with implementation of the Project that are described below. The SFMTA Board adopts all of the mitigation measures and improvement measures set forth in the Mitigation Monitoring and Reporting Plan (MMRP), attached as **Attachment B**. But, the SFMTA Board further finds that for the impacts listed below, despite

the implementation of all feasible mitigation measures, the effects remain significant and unavoidable.

Based on substantial evidence in the whole record, including the expert opinion of SFMTA and Planning Department staff and consultants to those staff, the SFMTA Board also finds that for some impacts identified in the FEIR, as noted below in this Section IV, no feasible mitigation measures were identified in the FEIR and those impacts remain significant and unavoidable. For a detailed explanation of the lack of feasible mitigation measures for some of the following impacts, and of the reasons why certain mitigation measures, although technologically feasible, may be subject to uncertainty, including funding-related uncertainty, please see the relevant discussions in the FEIR.

The SFMTA Board determines that the following significant impacts on the environment, as reflected in the FEIR, are unavoidable, but under Public Resources Code §§ 21081(a)(3) and (b), and CEQA Guidelines §§ 15091(a)(3), 15092(b)(2)(B), and 15093, the SFMTA Board determines that the impacts are acceptable due to the overriding considerations described in Section VI below. This finding is supported by substantial evidence in the record of this proceeding.

Transportation and Circulation

- **Impact TR-3:** Implementation of the Policy Framework Objective A, Action A.3, and Objective C, Actions C.3 through C.5 may result in significant traffic impacts.
  - *Mitigation Measure M-TR-8: Optimization of Intersection Operations.*

Because this measure may not be adequate to mitigate impacts to intersection traffic operations to less-than-significant levels, and because the feasibility of providing additional vehicle capacity is unknown and it is not always possible to optimize an intersection such that level of service will improve to level of service ("LOS") D or better, the impact on traffic operations remains significant and unavoidable.

- **Impact TR-5:** Implementation of the Policy Framework Objective A, Action A.3 and Objective C, Actions C.3 through C.5 may result in significant loading impacts.
  - *Mitigation Measure M-TR-10: Provision of Replacement Commercial Loading Spaces*
  - *Mitigation Measure M-TR-48: Enforcement of Parking Violations,*

These measures could reduce significant loading impacts to a less-than-significant level. However, in some locations on-street parking may not be available to convert to commercial loading spaces on the same block and side of the street or within 250 feet on an adjacent side

street, the feasibility of providing replacement commercial loading spaces pursuant to Mitigation Measure M-TR-10 cannot be assured in every situation. And because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of Mitigation Measure M-TR-48 is uncertain. Therefore, the impact of loss of on-street commercial loading spaces remains significant and unavoidable.

- **Impact TR-8:** Implementation of the following TPS Toolkit categories: Lane Modifications and Pedestrian Improvements may result in significant traffic impacts.

  - *Mitigation Measure M-TR-8: Optimization of Intersection Operations*

Because this measure may not be adequate to mitigate intersection traffic operations to less-than-significant levels, and because the feasibility of providing additional vehicle capacity is unknown and it is not always possible to optimize an intersection such that level of service will improve to LOS D or better, the impact on traffic operations remains significant and unavoidable.

- **Impact TR-10:** Implementation of the following TPS Toolkit categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, and Pedestrian Improvements, may result in significant loading impacts.

  - *Mitigation Measure M-TR-10: Provision of Replacement Commercial Loading Spaces*

While this measure could reduce significant loading impacts, in some locations on-street parking may not be available to convert to commercial loading spaces on the same block and side of the street or within 250 feet on an adjacent side street, the feasibility of providing replacement commercial loading spaces pursuant to Mitigation Measure M-TR-10 cannot be assured. Therefore, the impact of loss of on-street commercial loading spaces remains significant and unavoidable.

- **Impact TR-14:** Implementation of TPS Toolkit elements within the following categories: Lane Modifications and Pedestrian Improvements, along the program-level TTRP corridors may result in significant traffic impacts.

  - *Mitigation Measure M-TR-8: Optimization of Intersection Operations*

Because this measure may not be adequate to mitigate intersection traffic operations to less-than-significant levels, and because the feasibility of providing additional vehicle capacity is unknown and it is not always possible to optimize an intersection such that level of service will improve to LOS D or better, the impact on traffic operations remains significant and unavoidable.

- **Impact TR-16:** Implementation of the following TPS Toolkit categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, and Pedestrian Improvements, along the program-level TTRP corridors may result in significant loading impacts.

    - *Mitigation Measure M-TR-10: Provision of Replacement Commercial Loading Spaces*

While this measure could reduce significant loading impacts, in some locations on-street parking may not be available to convert to commercial loading spaces on the same block and side of the street or within 250 feet on an adjacent side street, the feasibility of providing replacement commercial loading spaces pursuant to Mitigation Measure M-TR-10 cannot be assured. Therefore, the impact of loss of on-street commercial loading spaces remains significant and unavoidable.

- **Impact TR-24:** Implementation of the project-level TTRP.14 Expanded Alternative would result in a significant traffic impact at the intersection of Randall Street/San Jose Avenue that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.14 Expanded Alternative conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-26:** Implementation of the project-level TTRP.22_1 Expanded Alternative would result in a significant traffic impact at the intersection of 16th/Bryant streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative conditions.

    - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets.*

Implementation of Mitigation Measure M-TR-26 would reconfigure the intersection of 16th and Bryant Streets such that the westbound approach would be a through lane and dedicated right turn-pocket and the eastbound approach would be to a shared through/right lane. Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, traffic impacts at the intersection of 16th and Bryant streets remain significant and unavoidable.

- **Impact TR-27:** Implementation of the project-level TTRP.22_1 Expanded Alternative would result in a significant traffic impact at the intersection of 16th Street/Potrero Avenue that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-28:** Implementation of the project-level TTRP.22_1 Expanded Alternative would result in a significant traffic impact at the intersection of 16th/Seventh streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-30:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 1 would result in a significant traffic impact at the intersection of 16th/Bryant streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 conditions.

  - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets*

Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, traffic impacts at the intersection of 16th and Bryant streets remain significant and unavoidable.

- **Impact TR-31:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 1 would result in a significant traffic impact at the intersection of 16th Street/Potrero Avenue that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-32:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 1 would result in a significant traffic impact at the intersection of 16th/Seventh streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-34:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 2 would result in a significant traffic impact at the intersection of 16th/Bryant streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 conditions.

  - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets*

Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, traffic impacts at the intersection of 16th and Bryant streets would remain significant and unavoidable.

- **Impact TR-35:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 2 would result in a significant traffic impact at the intersection of 16th Street/Potrero Avenue that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-36:** Implementation of the project-level TTRP.22_1 Expanded Alternative Variant 2 would result in a significant traffic impact at the intersection of 16th/Seventh streets that would operate at LOS E or LOS F conditions under Existing plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-38:** Implementation of the project-level TTRP.30_1 Expanded Alternative would result in a significant traffic impact at the intersection of Columbus Avenue/Green Street/Stockton Street that would operate at LOS E conditions under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-40:** Implementation of the project-level TTRP.30_1 Expanded Alternative Variant 1 would result in a significant traffic impact at the intersection of Columbus Avenue/Green Street/Stockton Street that would operate at LOS E conditions under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 1 conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-42:** Implementation of the project-level TTRP.30_1 Expanded Alternative Variant 2 would result in a significant traffic impact at the intersection of Columbus Avenue/Green Street/Stockton Street that would operate at LOS E conditions under Existing plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 2 conditions.

No feasible mitigation measures are available and the impact remains significant and unavoidable.

- **Impact TR-48:** Implementation of project-level TTRP.14 Moderate Alternative Variant 1 would result in a reduction in on-street commercial loading supply on Mission Street

such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

  - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

With implementation of this Mitigation Measure, the impacts related to loss of commercial loading spaces on transit and traffic operations would be reduced. However, because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-49:** Implementation of project-level TTRP.14 Moderate Alternative Variant 2 would result in a reduction in on-street commercial loading supply on Mission Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

  - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-50:** Implementation of project-level TTRP.14 Expanded Alternative would result in a reduction in on-street commercial loading supply on Mission Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

  - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-51:** Implementation of project-level TTRP.30_1 Moderate Alternative would result in a reduction in on-street commercial loading supply on Stockton Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

  - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-52:** Implementation of project-level TTRP.30_1 Expanded Alternative would result in a reduction in on-street commercial loading supply on Stockton Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

    - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-53:** Implementation of project-level TTRP.30_1 Expanded Alternative Variant 1 would result in a reduction in on-street commercial loading supply on Stockton Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

    - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact TR-54:** Implementation of project-level TTRP.30_1 Expanded Alternative Variant 2 would result in a reduction in on-street commercial loading supply on Stockton Street such that the existing loading demand during the peak hour of loading activities could not be accommodated within on-street loading supply and may create a potentially hazardous condition or significant delay that may affect traffic, transit, bicycles, or pedestrians.

    - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this measure is uncertain and impacts on this corridor remain significant and unavoidable.

- **Impact C-TR-1:** The Service Policy Framework and Service Improvements or Service Variants, in combination with past, present and reasonably foreseeable development in San Francisco, would contribute considerably to a significant cumulative impact on

transit, resulting in an exceedance of Muni's capacity utilization standard on the Mission corridor within the Southeast screenline of the Downtown screenlines under 2035 Cumulative plus Service Improvements only conditions.

- *Mitigation Measure M-C-TR-1: SFMTA Monitoring of Muni Service*

Implementation of this Mitigation Measure would reduce the cumulative impact on the affected corridor to a less-than-significant level. However, because the SFMTA cannot commit to future funding appropriations nor be certain of its ability to provide additional service citywide to maintain the capacity utilization standard, among other service goals, the feasibility of this mitigation measure is uncertain, and the cumulative impact on transit remains significant and unavoidable.

- **Impact C-TR-2:** The Service Policy Framework, TPS Toolkit elements as applied in the program-level TTRP corridors, and the Service Improvements with the TTRP Moderate Alternative, in combination with past, present and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative impacts on transit, resulting in exceedances of Muni's capacity utilization standard on the Fulton/Hayes corridor within the Northwest screenline and on the Mission corridor within the Southeast screenline of the Downtown screenlines under 2035 Cumulative plus Service Improvements and the TTRP Moderate Alternative conditions.

  - *Mitigation Measure M-C-TR-1: SFMTA Monitoring of Muni Service*

Implementation of this Mitigation Measure would reduce the cumulative impact on the affected corridor to a less-than-significant level. However, because the SFMTA cannot commit to future funding appropriations nor be certain of its ability to provide additional service citywide to maintain the capacity utilization standard, among other service goals, the feasibility of this mitigation measure is uncertain, and the cumulative impact on transit remains significant and unavoidable.

- **Impact C-TR-3:** The Service Policy Framework, the TPS Toolkit elements as applied in the program-level TTRP corridors, and the Service Improvements with the TTRP Expanded Alternative, in combination with past, present and reasonably foreseeable development in San Francisco, would contribute considerably to significant cumulative impacts on transit, resulting in exceedances of Muni's capacity utilization standard on the Fulton/Hayes corridor within the Northwest screenline and on the Mission corridor within the Southeast screenline of the Downtown screenlines under 2035 Cumulative conditions plus Service Improvements and the TTRP Expanded Alternative conditions.

  - *Mitigation Measure M-C-TR-1: SFMTA Monitoring of Muni Service*

Implementation of this Mitigation Measure would reduce the cumulative impact on the affected corridor to a less-than-significant level. However, because the SFMTA cannot commit to future funding appropriations nor be certain of its ability to provide additional service citywide to

maintain the capacity utilization standard, among other service goals, the feasibility of this mitigation measure is uncertain, and the cumulative impact on transit remains significant and unavoidable.

- **Impact C-TR-7:** Implementation of the Service Policy Framework Objective A, Action A.3 and Objective C, Actions C.3 through C.5 and TPS Toolkit categories: Lane Modifications and Pedestrian Improvements as applied in program-level TTRP corridors, in combination with past, present and reasonably foreseeable development in San Francisco, would result in cumulative traffic impacts at intersections along the corridors under 2035 Cumulative plus Service Improvements and the TTRP Moderate Alternative conditions.

    - *Mitigation Measure M-TR-8: Optimization of Intersection Operations*

Because this measure may not be adequate to mitigate intersection traffic operations to less-than-significant levels, and because the feasibility of providing additional vehicle capacity is unknown and it is not always possible to optimize an intersection such that level of service will improve to LOS D or better, the feasibility of mitigation is not assured. Therefore, the cumulative impact on traffic operations remains significant and unavoidable

- **Impact C-TR-9:** Implementation of the Service Policy Framework Objective A, Action A.3 and Objective C, Actions C.3 through C.5 and TPS Toolkit categories: Lane Modifications and Pedestrian Improvements as applied in program-level TTRP corridors would result in cumulative traffic impacts at intersections along the corridors under 2035 Cumulative plus Service Improvements and the TTRP Expanded Alternative conditions.

    - *Mitigation Measure M-TR-8: Optimization of Intersection Operations*

Because this measure may not be adequate to mitigate intersection traffic operations to less-than-significant levels, and because the feasibility of providing additional vehicle capacity is unknown and it is not always possible to optimize an intersection such that level of service will improve to LOS D or better, the effectiveness of this mitigation measure is not assured, and mitigation is infeasible. Therefore, the cumulative impact on traffic operations remains significant and unavoidable.

- **Impact C-TR-13:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.J Expanded Alternative would contribute considerably to cumulative traffic impacts at the intersection of Market/Church/14th streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-14:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.5 Expanded Alternative would result in cumulative traffic impacts at the intersection of Fulton Street/Masonic Avenue during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-15:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.8X Expanded Alternative would result in cumulative traffic impacts at the intersection of Geneva Avenue/Carter Street during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-16:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.8X Expanded Alternative would result in cumulative traffic impacts at the intersection of Geneva Avenue/Moscow Street during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-17:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.14 Expanded Alternative would result in project and cumulative traffic impacts at the intersection of Randall Street/San Jose Avenue during the a.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-18:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.14 Expanded Alternative would result in cumulative traffic impacts at the intersection of Mission/Fifth streets during the a.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-19:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.14 Expanded Alternative would result in cumulative impacts at the intersection of Mission/16th streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-20:** Implementation of the 2035 Cumulative plus Service Improvements and TTRP.22_1 Expanded Alternative would result in project and cumulative traffic impacts at the intersection of 16th/Bryant streets during the p.m. peak hour.
    - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets*

Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, cumulative traffic impacts at the intersection of 16th and Bryant streets remain significant and unavoidable.

- **Impact C-TR-21:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 would result in project and traffic cumulative impacts at the intersection of 16th/Bryant streets during the p.m. peak hour.

  - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets*

Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, cumulative traffic impacts at the intersection of 16th and Bryant streets remain significant and unavoidable.

- **Impact C-TR-22:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 would result in project and cumulative traffic impacts at the intersection of 16th/Bryant streets during the p.m. peak hour.

  - *Mitigation Measure M-TR-26: Intersection Restriping at 16th/Bryant streets*

Implementation of Mitigation Measure M-TR-26 would not improve intersection operations to LOS D or better during the p.m. peak hour; therefore, cumulative traffic impacts at the intersection of 16th and Bryant streets remain significant and unavoidable.

- **Impact C-TR-23:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative would result in project and cumulative traffic impacts at the intersection of 16th/Potrero streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-24:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 would result in project and cumulative traffic impacts at the intersection of 16th/Potrero streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-25:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 would result in project and cumulative traffic impacts at the intersection of 16th/Potrero streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-26:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative would result in cumulative traffic impacts at the intersection of 16th/Owens streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-27:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 would result in cumulative traffic impacts at the intersection of 16th/Owens streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-28:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 would result in cumulative traffic impacts at the intersection of 16th/Owens streets during the p.m. peak hour.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-29:** Implementation of the 2035 Cumulative plus Service Improvements plus the TTRP.22_1 Expanded Alternative would result in cumulative traffic impacts at the intersection of 16th/Fourth streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-30:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 would result in cumulative traffic impacts at the intersection of 16th/Fourth streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-31:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 would result in cumulative traffic impacts at the intersection of 16th/Fourth streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-32**: Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative would result in project and cumulative traffic impacts at the intersection of 16th/Seventh streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-33:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 1 would result in project and cumulative traffic impacts at the intersection of 16th/Seventh streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-34:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.22_1 Expanded Alternative Variant 2 would result in project and cumulative traffic impacts at the intersection of 16th/Seventh streets during the a.m. and p.m. peak hours.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-35:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.30_1 Expanded Alternative would result in project and cumulative traffic impacts at the intersection of Columbus Avenue/Green Street/Stockton Street.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-36:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 1 would result in project and cumulative traffic impacts at the intersection of Columbus Avenue/Green Street/Stockton Street.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-37:** Implementation of the 2035 Cumulative plus Service Improvements and the TTRP.30_1 Expanded Alternative Variant 2 would result in project and cumulative traffic impacts at the intersection of Columbus Avenue/Green Street/Stockton Street.

No feasible mitigation measures are available and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-43:** Implementation of the Policy Framework Objective A, Action A.3 and Objective C, Actions C.3 through C.5, and TPS Toolkit Categories: Transit Stop Changes, Lane Modifications, Parking and Turn Restrictions, and Pedestrian Improvements as applied to the program-level TTRP corridors in combination with past, present and reasonably foreseeable development in San Francisco, would result in cumulative loading impacts.

    - *Mitigation Measure M-TR-10: Provision of Replacement Commercial Loading Spaces.*

While this measure could reduce significant loading impacts, in some locations on-street parking may not be available to convert to commercial loading spaces on the same block and side of the street or within 250 feet on an adjacent side street, the feasibility of providing replacement commercial loading spaces pursuant to Mitigation Measure M-TR-10 cannot be assured. Therefore, the cumulative impact of loss of on-street commercial loading spaces remains significant and unavoidable.

- **Impact C-TR-44:** Implementation of the project-level TTRP Moderate Alternative including the TTRP.14 Variant 1, TTRP.14 Variant 2, and TTRP.30_1 in combination with past, present and other reasonably foreseeable development in San Francisco, would result in cumulative loading impacts.

    - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this mitigation measure is uncertain and cumulative impacts on this corridor remain significant and unavoidable.

- **Impact C-TR-45:** Implementation of the project-level TTRP Expanded Alternative including the TTRP.14, TTRP.30_1, TTRP.30_1 Variant 1, and TTRP.30_1 Variant 2, in combination with past, present and reasonably foreseeable development in San Francisco, would result in project and cumulative loading impacts.

    - *Mitigation Measure M-TR-48: Enforcement of Parking Violations*

Because the effectiveness of the use of camera video enforcement of parking regulations along new transit-only lanes is not known, the feasibility of this mitigation measure is uncertain and cumulative impacts on these corridors remain significant and unavoidable.

- **Impact C-TR-49:** Implementation of the Service Policy Framework Objective A, Action A.3 and Objective C, Actions C.3, C.4 and C.5, and the TPS Toolkit categories: Lane Modifications, Parking and Turn Restrictions, and Pedestrian Improvements as applied in program-level TTRP corridors, in combination with past, present and reasonably foreseeable development in San Francisco, may result in significant cumulative parking impacts.

- *Mitigation Measure M-C-TR-49: Explore the Implementation of Parking Management Strategies.*

It is uncertain whether parking management strategies would mitigate this significant cumulative parking impact to a less-than-significant level. Therefore, feasibility of this mitigation measure cannot be assured, and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-52:** Implementation of the project-level TTRP Moderate Alternative for the TTRP.14 Variant 1 or the TTRP.14 Variant 2, in combination with past, present and reasonably foreseeable development in San Francisco, would result in significant cumulative parking impacts.

    - *Mitigation Measure M-C-TR-49: Explore the Implementation of Parking Management Strategies*

It is uncertain whether parking management strategies would mitigate this significant cumulative parking impact to a less-than-significant level. Therefore, feasibility of this mitigation measure cannot be assured, and the cumulative impact remains significant and unavoidable.

- **Impact C-TR-54:** Implementation of the project-level TTRP Expanded Alternative for the TTRP.22_1, TTRP.22_1 Variant 1, or TTRP.22_1 Variant 2, in combination with past, present and reasonably foreseeable development in San Francisco, would result in significant cumulative parking impacts.

    - *Mitigation Measure M-C-TR-49: Explore the Implementation of Parking Management Strategies*

It is uncertain whether parking management strategies would mitigate this significant cumulative parking impact to a less-than-significant level. Therefore, feasibility of this mitigation measure cannot be assured, and the cumulative impact remains significant and unavoidable.

V. EVALUATION OF PROJECT ALTERNATIVES

This Section describes the alternatives to the project analyzed in the FEIR and the reasons for finding the alternatives infeasible and rejecting them as required by Public Resources Code section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3). This section also outlines the reasons for approving the TEP as proposed.

CEQA mandates that an EIR evaluate a reasonable range of alternatives to the project that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen effects of the project, and evaluate the comparative merits of the project." (CEQA Guidelines Section 14126.6(a).) CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide the decisionmakers with a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative

analysis is used to consider reasonably, potentially feasible options for minimizing environmental consequences of the Proposed Project.

The Alternatives listed below and rejected are rejected as infeasible based upon substantial evidence in the record, including evidence of economic, legal, social, technological, and other considerations described in this Section, and for the reasons described in Section VI below, which is incorporated herein by reference.

A. Reasons for Approving Proposed Project

As discussed above in Section I and in Chapter 2 of the FEIR, the TEP consists of a Service Policy Framework, Service Improvements, 12 Service-Related Capital Improvements, and Travel Time Reduction Proposals (TTRPs) (which apply various items from the Transit Preferential Streets "Toolkit") along 17 transit corridors. For the purposes of environmental review, the FEIR described and analyzed two possible TEP projects—referred to as the TTRP Moderate Alternative and the TTRP Expanded Alternative—at an equal level of detail and analysis. This was done because, although the "TEP" was examined in one environmental document in order to understand the full scope of its potential environmental impacts, the TEP is actually a collection of projects and proposals, which, while related, may be implemented at various times and, in many cases, independently of each other.

Thus, the FEIR defined and analyzed the proposed project as two alternatives in order to capture the reasonable range of TEP proposals the SFMTA may chose to implement over time and to evaluate the potential environmental impacts resulting from that range. Both alternatives would implement the Service Policy Framework, the Service Improvements, Service Variants, the Service-related Capital Improvements, and the TPS Toolkit as applied to the program-level TTRP corridors. The difference between the two alternative projects is that under the TTRP Moderate Alternative, these elements would be implemented in combination with a "moderate" number of TPS Toolkit elements along certain Rapid Network corridors and, under the TTRP Expanded Alternative, these elements would be implemented in combination with an "expanded" number of TPS Toolkit elements along the same Rapid Network corridors. The rationale behind this is that the TTRP Moderate Alternative would capture a project with fewer and less substantial physical environmental effects and the TTRP Expanded Alternative would capture a project with more substantial physical environmental effects.

It is not known at this time when or if the full scope of all the TTRP proposals included in the TEP will be implemented. Implementation of various TTRP proposals will depend on community and stakeholder input, as well as a myriad of policy and budgetary considerations. It is likely that, over time, the SFMTA will implement at a project-level a collection of TTRP proposals that fall somewhere in between the TTRP Moderate and Expanded Alternatives analyzed in the FEIR. However, at this time, it is not known whether a given project along a TTRP corridor will include components of the Moderate Alternative or the Expanded Alternative, or a mixture of the

two. Because of this, the SFMTA Board is not now rejecting either the TTRP Moderate Alternative or the TTRP Expanded Alternative. Rather, the SFMTA Board is taking action to approve both alternatives at a conceptual and programmatic level and to direct staff to continue to develop specific project proposals for each TTRP corridor. Once any such projects are proposed for approval, the SFMTA Board would adopt as necessary findings to reject alternatives to those proposed TTRP projects.

The SFMTA Board finds that the Project will provide the following benefits:

- Support and implement the City's Transit First Policy by providing clear direction for managing modal allocation of space on the transportation system for the City of San Francisco.
- Improve the cost-effectiveness and productivity of transit operations.
- Improve the customer experience on the transit system.
- Improve transit system reliability.
- Improve transit travel times.
- Improve safety for pedestrians, bicyclists, and transit riders.
- Realign transit routes to eliminate underused routes and increase headways on heavily-used routes.
- Reduce crowding on heavily-used routes.
- Improve accessibility to the transit system.
- Attract more passengers to the transit system and increase the use of transit by existing riders.
- Reduce the use of automobiles on City streets.

B. Alternatives Rejected and Reasons for Rejection

The SFMTA Board of Directors rejects the No Project Alternative described and analyzed in the FEIR because the SFMTA Board finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described in this Section in addition to those described in Section VI below under CEQA Guidelines Section 15091(a)(3), that make this alternative infeasible. In making these determinations, the SFMTA Board is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." The SFMTA Board is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project; and (ii) the question of whether an

alternative is “desirable” from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Because both of the other alternatives analyzed in the FEIR—the TTRP Moderate Alternative and the TTRP Expanded Alternative—included implementation of the Service Policy Framework, the Service Improvements, Service Variants, the Service-related Capital Improvements, and the TPS Toolkit as applied to the program-level TTRP corridors, rejecting the No Project Alternative rejects every alternative that would fail to implement these TEP proposals as infeasible.

1. Alternative A: No Project

Under the No Project Alternative, the Service Policy Framework would not be adopted. The SFMTA would not implement the transit service changes included in the Service Improvements and Service Variants, and would not construct the Service-related Capital Improvements or the Travel Time Reduction Proposals. The SFMTA regularly monitors performance of the transit system and routinely makes adjustments to improve service when funding and resources are available. Therefore, under the No Project Alternative, some of the features of the TEP, such as elements in the TPS Toolkit, would be implemented; for example, transit bulbs and pedestrian bulbs would continue to be installed and accessible boarding platforms would continue to be added on a location-by-location basis when feasible. However, no scheduled program of improvements would be implemented without adoption of the TEP. With the No Project Alternative, the significant physical impacts related to traffic, loading, and cumulative parking conditions identified in the FEIR for the Project and set forth above would not occur, and the mitigation measures identified in the EIR and the Initial Study would not be necessary.

The No Project Alternative would not provide for an organized, comprehensive, coordinated program of transit system improvements. Transit system reliability and efficiency would not improve, and crowding on some routes would not be expected to change substantially from existing conditions. Under cumulative conditions with the No Project Alternative, the transit system would become more crowded as growth and development continue to occur in the City. Transit travel times would not improve on a coordinated basis. A mode shift from automobiles to transit use would not occur, resulting in additional automobile congestion. The No Project Alternative would not help the City support the Transit First Policy. Additionally, traffic congestion will continue to degrade the performance of the surface transit system leading to increasing operating costs born by the City of San Francisco tax payers. As costs continue to increase, and on time performance continues to degrade, resources that had originally been identified to provide additional service will be used to supplement existing operations. This spiral of increased operational subsidies with no increase in service may result in lower

ridership, which leads to decreasing revenue and a downward spiral in the sustainability of the transit system and mobility for residents and visitors to the City of San Francisco.

For these reasons, the SFMTA Board finds that, on balance, the Project is preferable to the No Project Alternative and the No Project Alternative is rejected as infeasible.

2. Alternatives Considered and Rejected in the EIR

Alternative locations for the TEP would not be feasible because the Project is a systemwide program to improve the existing transit infrastructure and service in San Francisco; therefore, alternative locations outside of San Francisco are rejected. Alternative locations for transit improvements on streets other than those proposed are rejected as infeasible because of the need to maintain connectivity and geographic coverage within the existing transit and overall transportation network.

The SFMTA considered several potential alternatives to aspects of the TEP's TTRP Moderate and Expanded Alternatives. These alternatives include the following:

- Transit-only streets along high transit ridership corridors.
- Transit-only lanes along the entirety of all existing four-lane (or more) transit corridors.
- Stop sign removal and replacement with traffic signals at all stop sign locations on transit corridors.
- Stop consolidation and optimization standards as recommended in best practices literature.
- Route terminal relocation and optimization for some routes with terminal locations at unproductive route segments or in low transit demand locations.
- Fleet mode change by route, such as servicing some routes that currently operate with existing trolley vehicles with the diesel fleet or vice versa.
- Additional extensions to existing routes.
- Modification of route tails (swapping one route segment with a different route segment to serve the same transit corridor).
- Route discontinuations and other route segment eliminations.
- Use of higher capacity vehicles on certain routes (note that the TEP includes service on some routes, such as the 5 Fulton, with higher capacity vehicles, but not on others).
- Streamlining all routes for improved directness by, for example, reducing the number of turns (streamlining is included in the TEP for some routes).
- Modifying frequency for all routes (frequency modifications, both increased and decreased frequency, is included in the TEP for some routes).
- Reducing the span of service for some routes.

- Farside boarding at all signalized intersections (farside boarding at signalized intersections is included in the TEP for many routes, but not all).

These alternatives were removed from consideration during development of the TEP for a variety of reasons as set forth in Section 6.5 of the FEIR. The SFMTA Board concurs with the findings in the EIR, and rejects these alternatives as infeasible for the reasons set forth therein.

VII. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA § 21081 and CEQA Guidelines § 15093, the SFMTA Board of Directors hereby finds, after consideration of the FEIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below independently and collectively outweighs the significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the SFMTA Board will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Section, and in the documents found in the Record of Proceedings, as defined in Section I.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the SFMTA Board specially finds that there are significant benefits of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations. The SFMTA Board further finds that, as part of the process of obtaining Project approval, all significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. All mitigation measures identified in the EIR for the Project are adopted as part of this approval action. The SFMTA Board has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technical, legal, social and other considerations.

The Project will have the following benefits:

- The Service Policy Framework and the TEP will support and implement the City's Transit First Policy.
- Improved transit service with the TEP, including improved (reduced) transit travel times, increased efficiency and improved reliability, will make Muni a more attractive transportation mode, resulting in more use of transit and less automobile travel throughout the City.

- Implementing the TEP will improve safety for pedestrians, bicyclists, and transit riders.
- Improved network efficiency and reduced system redundancy with implementation of the TEP will improve the cost-effectiveness of transit operations.
- Implementation of the TEP capital projects will support increased access for seniors and people with disabilities by expanding accessible rail stops and making platform upgrades.
- Enhanced transit service on the busiest lines will drastically improve the customer experience by reducing crowding.
- Service level expansion will improve system-wide neighborhood connectivity and access to regional transit by providing more frequent service between neighborhoods.
- Finite public resources will be redirected to better match travel demand and trip patterns based on existing community needs.

Having considered these benefits, the SFMTA Board of Directors finds that the benefits of the TEP outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects are therefore acceptable.