Mr. Edward D. Reiskin
Director of Transportation
San Francisco Municipal Transportation Agency
1 Van Ness Avenue
San Francisco, CA 94102

JUN 01 2018

RE: Record of Decision for the Geary Corridor Bus Rapid Transit Project

Dear Mr. Reiskin,

The Federal Transit Administration (FTA) has completed its review of the public and interagency comments on the Draft Environmental Impact Statement (EIS) for the Geary Corridor Bus Rapid Transit Project. In compliance with the National Environmental Policy Act (NEPA) and consistent with 23 USC 139 (n)(2), FTA has issued the enclosed single document consisting of the Final EIS and Record of Decision (ROD) for the Project.

If the San Francisco Municipal Transportation Agency (SFMTA) or San Francisco County Transportation Authority (SFCTA) contemplates any change to the Project, SFMTA or SFCTA must notify FTA immediately and refrain from taking any action related to the proposed change until FTA has determined what, if any, additional environmental analysis is necessary, and that analysis has been completed and approved by FTA. For example, if SFMTA or SFCTA wishes to make a change to the mitigation measures in the Final EIS, the ROD, or a change to the Project that would cause new or changed environmental or community impacts not presented in the Final EIS, then SFMTA or SFCTA must notify FTA in writing of the desire to make a change.

Any such change will be reviewed in accordance with FTA environmental procedures (23 CFR § 771.129-130) on supplemental documentation. FTA will determine the appropriate level of environmental review for this or any other proposed change (i.e., a written re-evaluation of the Final EIS, an environmental assessment of the change, or a supplemental EIS), and the NEPA process for this supplemental environmental review will conclude with a separate NEPA determination or, if necessary, with an amendment to this ROD.
Please make the Final EIS and ROD and supporting documentation available to affected
government agencies and the public. Availability of the document should be published in local
newspapers and should be posted on the Project website. The document also should be provided
directly to affected government agencies, including the State Inter-Governmental Review contact
established under Executive Order 12372.

We look forward to continuing to work with you to bring this important Project to fruition.
Should you have any questions, please contact Ms. Mary Nguyen, Environmental Protection
Specialist, at (213) 202-3960.

Sincerely,

[Signature]

Edward Carranza, Jr.
Acting Regional Administrator
RECORD OF DECISION
BY THE
FEDERAL TRANSIT ADMINISTRATION
on the
Geary Corridor Bus Rapid Transit Project
in San Francisco, California

Decision

The Federal Transit Administration (FTA), pursuant to Title 23 of the Code of Federal Regulations (CFR) Part 771 and Title 40 CFR Parts 1500-1508, has determined that the requirements of the National Environmental Policy Act of 1969 (NEPA) and related federal environmental statutes, regulations, and executive orders have been satisfied for the Geary Corridor Bus Rapid Transit (BRT) Project (the project) in San Francisco, California.

This Record of Decision (ROD) applies to the Hybrid Alternative/Locally Preferred Alternative (LPA) consisting of dedicated center- and side-running bus travel lanes and related facilities along the Geary corridor, as described in the Geary Corridor Bus Rapid Transit Project Final Environmental Impact Statement (Final EIS), dated June 2018. FTA served as the federal lead agency under NEPA. The San Francisco County Transportation Authority (SFCTA) served as the joint lead agency under NEPA and the local lead agency for environmental review under the California Environmental Quality Act (CEQA). San Francisco Municipal Transportation Agency (SFMTA) was a responsible agency under CEQA. SFMTA will implement and operate the project. SFMTA would seek financial assistance from FTA for the project. SFMTA is also a joint lead agency under NEPA.

If FTA provides financial assistance for the final design or construction of the project, the project must be designed and built as presented in the Final Environmental Impact Statement (EIS) and the ROD. Any proposed change must be evaluated in accordance with 23 CFR Parts 771.129-130 and FTA must approve the change before the agency requesting the change can proceed.

Background

The purpose of the project is to enhance the performance, viability, and comfort level of transit and pedestrian travel along the Geary corridor. The 6.5-mile-long Geary corridor is a primary east-west arterial and transit spine in the northern half of San Francisco, California. The Geary corridor includes Geary Boulevard between 48th Avenue and Gough Street; Geary Street between Gough Street and Market Street; O’Farrell Street between Gough Street and Market Street; and various blocks of Market, Fremont, Beale, Mission, and First streets that comprise bus routes to and from the Transbay Transit Center. The Geary corridor is a major thoroughfare, and it accommodates more than 50,000 daily person trips via public transit; auto volumes up to 44,000 vehicles per day; and tens of thousands of daily pedestrian trips. SFMTA currently operates four bus routes along the Geary corridor: the 38 Geary, the 38 Geary Rapid (38R), the 38 Geary A Express (38AX), and the 38 Geary B Express (38BX) routes.

Improvements are needed to promote ridership and to improve competitiveness of transit against other travel modes. Moreover, the wide travelway and high vehicle speeds of the Geary corridor create unfavorable pedestrian conditions, especially west of Gough Street.
and throughout the Richmond District. The Geary corridor’s existing street and streetscape environment do not provide a high-quality transit passenger experience.

The project would implement BRT service along the Geary corridor with dedicated bus-only lanes, higher-frequency bus service, new BRT stations, improvements to pedestrian features, and upgrades to traffic signals including fiber-based transit signal priority (TSP) to optimize bus service. Physical roadway and lane changes are proposed between Market Street and 34th Avenue, while bus service amenities and improvements would be provided along the Geary corridor from the Transbay Transit Center to 48th Avenue.

**Planning for the Project**

Three studies documented planning for the project. These studies include the *Geary Corridor Bus Rapid Transit Study* (May 2007) (Feasibility Study), the *Geary Bus Rapid Transit Alternatives Screening Report* (May 2009) (Screening Report) and the *Geary Bus Rapid Transit Design Options Screening Report* (January 2014). These reports built upon one another in developing, evaluating, and screening designs for individual segments of the Geary corridor, combining designs by segment into alternatives for the corridor, and identifying design constraints and performance tradeoffs. These planning studies provide support for the local agencies’ recommendation for the alternatives that were carried forward into the environmental process. See below “Alternatives Considered” for more detail.

**Alternatives Considered**

The Feasibility Study evaluated the feasibility of three different conceptual design BRT configurations in the Geary corridor, as well as two “no build” non-BRT options. The BRT configurations considered in the Feasibility Study were “Side BRT” (with side-running bus-only lanes); “Center BRT with 2 Medians” (center-running bus-only lanes with passenger platforms on dual medians); and “Center BRT with 1 Median” (center-running bus-only lanes with a single central boarding platform in a central median). The two “no build” non-BRT options included “basic transit priority” such as TSP, low-floor buses, and some real-time information, consistent with system-wide improvements by SFMTA; however, no BRT improvements included. The second “no build” alternative was the “basic plus transit priority” which assumed a dedicated transit lane in peak directions, plus possible stop consolidation, bus management strategies, enhanced street line management, longer bus stops where needed, and bus bulbs at the busiest stops.

The Feasibility Study found the three BRT configurations to be potentially feasible and each would result in different transportation benefits. The study did not eliminate any of the three BRT configurations, and each of the “no build” alternatives were found feasible. However, the “no build” alternatives offered less benefit and less transit performance improvement than the BRT configurations.

SFCTA continued alternatives development and screening between 2009 and 2014, including two key screening steps. The first screening step was SFCTA’s 2009 Screening Report, which examined the three BRT configurations plus both of its no build options from the Feasibility Study. The Screening Report also introduced an additional alternative with a new BRT configuration and several non-BRT options such as peak-period bus-only lanes, all day bus-only lanes, and surface and underground rail options. The Screening
Report considered ten corridor-wide configurations or service alternatives, plus six alternatives specific to the area east of Gough Street. The Screening Report more closely examined how the various configurations could work in different portions of the Geary corridor, and further noted that any corridor-wide configuration could be composed of segments featuring one or more of the various configurations studied within. The Screening Report dismissed from further consideration several configurations found to have fatal flaws (ineffective, infeasible, and/or prohibitively expensive to construct). Six alternatives were put forward for further consideration: three BRT configurations (side-running BRT, center-running BRT with side platforms/dual medians, and center-running BRT with center platforms), two minimal action alternatives, and the No Build Alternative.

The second screening step focused on particularly challenging areas of the corridor, such as at Fillmore Street, where the Geary corridor is a depressed, multilane roadway, and at Masonic Avenue, under which the Geary corridor traverses a tunnel. SFCTA published its findings in the 2014 Geary Bus Rapid Transit Design Options Screening Report. This report screened out numerous options for the Fillmore and Masonic areas and helped inform the development of the Hybrid Alternative. Discussion of alternatives eliminated from further consideration may be found in Chapter 10 of the Final EIS.

After the consideration of these planning efforts and the public input received during scoping for the project, the following alternatives were carried forward in the analysis of the Draft EIS/EIR:

- No Build Alternative
- Alternative 2 – Side-Lane BRT
- Alternative 3 – Center-Lane BRT with Dual Medians and Passing Lanes
- Alternative 3-Consolidated – Center-Lane BRT with Dual Medians, and Consolidated Bus Service
- Hybrid Alternative/LPA – Incorporates Elements of Alternatives 2 and 3-Consolidated

**No Build Alternative**

The No Build Alternative represents the baseline scenario if none of the proposed Build Alternatives were implemented. Under the No Build Alternative, physical infrastructure and transit service in the Geary corridor would remain unaltered except for changes associated with other City projects described below that are either planned or programmed to be implemented in the Geary corridor by the year 2020. The year 2020 is considered the opening year for all alternatives because it is the earliest year by which any of the Build Alternatives could be expected to be fully operational; therefore, it is also the most reasonable year for the No Build Alternative as a basis of comparison.

The No Build Alternative includes wireless TSP; bus stop amenity improvements such as shelter enhancements, bike racks, decals, redesigned flag signs, and transit poles outfitted with solar-powered lanterns; new, low-floor biodiesel-electric hybrid buses; pavement maintenance/rehabilitation; new or upgraded traffic signals at various locations; and pedestrian improvements including new countdown signals, curb ramps, 14 new pedestrian crossing bulbs, and high-visibility crosswalk striping.

The No Build Alternative incorporates the existing side-running bus-only lanes in the easternmost portion of the Geary corridor, on most of Geary and O’Farrell streets between Market and Gough streets. The No Build Alternative also assumes the incorporation of
proposed bus-only lanes on Beale, Fremont, and Mission streets, south of Market Street to be completed as part of the separate Transbay Center District Plan. The No Build Alternative includes the improvements planned under the City’s Transit Effectiveness Project (TEP) (now called Muni Forward) that have already been implemented or will be implemented in the Geary corridor by 2020.

**Build Alternatives**

As detailed in Section 2.2.3 of the Final EIS, the build alternatives propose a common set of transit, pedestrian, and roadway improvements including: fiber-based TSP between 25th Avenue and Gough Street, bus service at more frequent intervals (see Table 2-3 in Final EIS), additional vehicles with low-floor design, new BRT stops, enhanced local stops, bus only lanes, and bus bulbs. The build alternatives differ primarily in their bus-only lane configurations (center-running versus side-running) along various portions of the Geary corridor. The different configurations are shown in Figure 2-1 of the Final EIS and described below.

_Altimate 2 – Side-Lane BRT._ Alternative 2 includes new side-running bus-only lanes in the Geary corridor, primarily between Gough Street and 34th Avenue. BRT buses would operate in dedicated side-running bus-only lanes, replacing the existing outside travel lanes of the Geary corridor, next to the existing curbside parking lane that would remain at most locations. Between 34th and 48th avenues, no bus-only lanes would be constructed; all buses would operate in mixed-flow lanes. _Alternative 3 – Center-Lane BRT with Dual Medians and Passing Lanes._ Alternative 3 proposes new side-running bus only lanes between Gough and Laguna streets. At Laguna Street, side-running bus-only lanes would transition to center-running bus-only lanes west to 27th Avenue. At 27th Avenue, bus-only lanes would transition again from center-running to side-running; side-running bus-only lanes would continue to 34th Avenue. A bus passing lane at local bus stops would enable BRT buses to pass local buses that are stopped to load and unload passengers. The center-lane design would include filling in the Fillmore underpass and reconfiguring the Masonic tunnel for a BRT stop.

_Altimate 3-Consolidated – Center-Lane BRT with Dual Medians and Consolidated Bus Service._ Alternative 3-Consolidated would implement a largely similar bus-only lane configuration between Laguna Street and 27th Avenue; however, BRT service would replace both 38R and 38 Local services as a new consolidated service, eliminating the need for bus passing lanes.

_Hybrid Alternative/LPA_. The Hybrid Alternative/LPA combines elements of Alternative 2 and Alternative 3-Consolidated. This alternative includes new side-running bus-only lanes primarily from Market Street to Palm Avenue; then center-running bus-only lanes to 27th Avenue in the eastbound direction and 28th Avenue in the westbound direction. At 27th Avenue (inbound) and 28th Avenue (outbound), center-running bus-only lanes would transition to side-running, and continue west to 34th Avenue. Between 34th and 48th avenues, no bus-only lanes would be constructed; all buses would operate in mixed-flow lanes. The Hybrid Alternative/LPA is illustrated in Attachment 1 of the ROD.

The Draft EIS/EIR identified the Hybrid Alternative as the Staff-Recommended Alternative. As noted in Final EIS Section 2.1.1, SFCTA and SFMTA, primarily in response to public comments on the Draft EIS/EIR, incorporated six minor modifications into the Hybrid Alternative:
1) Retention of the Webster Street pedestrian bridge;
2) Removal of proposed BRT stops between Spruce and Cook streets (existing stops
would remain and provide local and express services);
3) Addition of more pedestrian crossing and safety improvements;
4) Addition of BRT stops at Laguna Street;
5) Retention of existing local and express stops at Collins Street; and
6) Relocation of the westbound center- to side-running bus lane transition to the block
between 27th and 28th Avenues

SFCTA released a Final EIR for the Geary BRT project on December 9, 2016. The SFCTA
Board of Commissioners adopted the Hybrid Alternative with five minor modifications as
the LPA on January 5, 2017 and SFCTA issued a Notice of Determination (NOD) on
January 6, 2017. The sixth minor modification was subsequently added and analyzed in a
CEQA addendum; the SFCTA Board took an approval action on June 27, 2017. The
SFMTA Board unanimously approved the project and concurred with the LPA, including
the six minor modifications on July 18, 2017. SFMTA issued a NOD on July 25, 2017.

**Description of the Project**

This ROD identifies the Hybrid Alternative/LPA, with the addition of the referenced six
modifications above, as the NEPA Preferred Alternative (or Preferred Alternative) as
described in Chapter 2 of the Final EIS. The Preferred Alternative would provide BRT
service with a combination of side-running and center-running bus-only lanes as well as
within mixed-flow travel lanes along different segments of the 6.5-mile Geary corridor, as
depicted in Attachment 1 to this ROD. The Preferred Alternative would feature a total of 27
westbound and 24 eastbound BRT stops between 48th Avenue and the Transbay Terminal.
The Preferred Alternative would remove 8 westbound and 12 eastbound stops that currently
provide local, Rapid, and/or Express service(s).

**Environmentally Preferable Alternative**

The “environmentally preferable alternative” is the alternative required by 40 CFR Part
1505.2(b) to be identified that causes the least damage to the biological and physical
environment and best protects, preserves, and enhances historical, cultural, and natural
resources. The Hybrid Alternative/LPA was identified as the environmentally preferable
alternative.

The Hybrid Alternative/LPA results in the greatest reduction in greenhouse gas emissions
(carbon dioxide emissions) by 2035 of any of the project alternatives. While both the
Hybrid Alternative/LPA and Alternative 3-Consolidated would have the greatest beneficial
air quality impacts in terms of reduced operational pollutants and emissions, the Hybrid
Alternative/LPA would have less short-term construction impacts relative to Alternatives 3
and 3-Consolidated because the Hybrid Alternative/LPA does not include the intensive
construction activities required to fill the Fillmore Street underpass and reconfigure the
Masonic Avenue tunnel roadway.

With the implementation of mitigation, the alternatives would have no adverse effects to
environmental topic areas, except for transportation. All Alternatives would result in
adverse impacts to signalized intersection level of service. Although Alternative 2 would
result in the least amount of adversely impacted intersections (5), the Hybrid Alternative
follows closely with the second fewest number of intersections (8) that are adversely
impacted in 2035. Considering the Hybrid Alternative’s better long-term operational air
quality impacts, when compared to Alternative 2, the Hybrid Alternative is the
environmentally-preferable alternative.

**Basis for Decision**

FTA weighed the ability of the project alternatives to meet the purpose and need, the
economic and technical feasibility of the project alternatives, the environmental effects of
the alternatives, local agency decision-making subsequent to publication of the Draft
EIS/EIR, and public comments on the Draft EIS/EIR and submitted following the close of
the review period of the Draft EIS/EIR (December 10, 2015, through July 11, 2017). Based
on these factors, FTA has determined that the Hybrid Alternative/LPA meets the stated
purpose and need as outlined in Chapter 1 of the Final EIS.

*Improve Transit Performance.* The Preferred Alternative would improve transit travel time,
reliability, and ridership along the Geary corridor. By 2035, transit service on the Geary
corridor would operate at faster speeds and be more reliable than local and Rapid buses
operating under the No Build Alternative. The Preferred Alternative would increase transit
ridership to approximately 95,000 daily riders in 2035 (compared with approximately
77,000 under the 2035 No Build Alternative conditions or approximately 50,000 under year
2012 conditions). By 2035, the Preferred Alternative is projected to have a 21 percent to 23
percent travel time savings and a greater than 20 percent reliability improvement over the
No Build Alternative.

*Improve Pedestrian Conditions and Pedestrian Access to Transit.* The Preferred Alternative
would improve pedestrian safety by providing 77 additional bulbs for a total of 91
pedestrian crossing bulbs, high-visibility crosswalks, signal upgrades, and protected left-
turn signals, among other enhancements. The Preferred Alternative would further enhance
pedestrian crossing safety by increasing the number of intersections at which vehicles have
protected left turns (i.e., vehicles may only turn with a left-turn arrow) while reducing the
number of intersections at which vehicles have permissive left turns (i.e., vehicles may turn
left with a green signal provided there is no conflicting oncoming traffic and/or pedestrian
crossing).

*Enhance Transit Access and Overall Passenger Experience.* The Preferred Alternative
would improve passenger experience by improving vehicle travel time and reliability of
transit. The new BRT stops would include amenities such as shelter enhancements, bike
racks, decals, redesigned flag signs, and transit poles outfitted with solar-powered lanterns,
which would help improve the passenger experience. The Preferred Alternative would also
help to reduce overcrowding along the Geary corridor which would improve riding
conditions. Heavily used transit stops near Market Street and Japantown area would see
improved loading area to improve passenger volume and the overall passenger experience.

**Public Involvement and Outreach**

SFCTA, in coordination with SFMTA, undertook a comprehensive outreach effort to
inform the public about the environmental scope and alternatives development, including
three public scoping meetings, meetings with both a project-specific Geary BRT Citizens
Advisory Committee (CAC) and Geary BRT Technical Advisory Committee, and
numerous stakeholder meetings. Informational materials were disseminated through
mailings (electronic and postal), advertisements and fliers on buses, and advertisements in community newspapers.

The project mailing list includes more than 23,000 persons. The Geary BRT CAC provided a sustained public forum for community input with more than 30 bimonthly meetings held since inception. SFCTA and SFMTA met with more than 40 local organizations and interest groups during preparation of the Draft EIS/EIR, with additional follow-up meetings after Draft EIS/EIR publication.

Copies of the Draft EIS/EIR were available for public review during normal business hours at the SFCTA front desk, 1455 Market St., 22nd floor, San Francisco, CA. Copies were also available for public review in several libraries near the Geary corridor. SFCTA posted the Draft EIS/EIR for public review on its website at:

http://www.sfcta.org/geary-BRT-draft-eis-eir

SFCTA, in coordination with SFMTA, also posted the NOA on its website, sent paper copies of the NOA to over 2,000 interested and nearby property owners along the Geary corridor, posted it at bus shelters along the Geary corridor, and published it in seven local newspapers. SFCTA also mailed copies of the NOA to all individuals who had requested to be notified of the availability of the Draft EIS/EIR. SFCTA posted Facebook ads and Nextdoor messages to announce the public comment meeting, targeting people using the Facebook and Nextdoor applications who live and/or work near the Geary corridor. In communities with high numbers of people who do not speak English, information was provided in multiple languages (Chinese, Japanese, Korean, Russian, Spanish, Filipino, and Vietnamese) including bus cards, bus shelter advertisements, the project fact sheet, newspaper advertisements, and email communications.

During the public review period for the Draft EIS/EIR, a public meeting was held on November 5, 2015, at Saint Mary’s Cathedral in San Francisco. The public comment period for the Draft EIS/EIR, originally scheduled to end on November 16, 2015, was extended to November 30, 2015. To allow for potential postal delays, the agencies accepted any comment received by December 9, 2015.

During the public comment period, a total of 263 different agencies, organizations, and individuals provided a total of 299 comment communications via letters, emails, comment cards, and oral comments at the November 5, 2015, public meeting. Comments on the Draft EIS/EIR highlighted several key areas of public concern such as the range of alternatives studied, project costs, construction effects, and parking. Chapter 8 of the Final EIS documents the public outreach efforts conducted subsequent to publication of the Draft EIS/EIR. Appendix L of the Final EIS includes responses to comments received.

Although the Draft EIS/EIR had been prepared as a combined document to meet the requirements of both NEPA and CEQA, the federal and local lead agencies prepared separate final environmental documents. To this end, SFCTA published a Final EIR for the project on December 9, 2016. SFCTA’s publication of the Final EIR occurred via notifications in multiple formats and languages similar to those used for the Draft EIS/EIR, including a radius mailing along the corridor. SFCTA posted the Final EIR for public review on its website at:

http://www.sfcta.org/geary-corridor-bus-rapid-transit-final-eir
Determinations and Findings

Section 106 of the National Historic Preservation Act (36 CFR Part 800)

The area of potential effect (APE) contains 53 historic properties that are currently listed in the National Register of Historic Places (NRHP) or are eligible for NRHP listing. The proposed improvements would occur within the public right-of-way. There would be no right-of-way acquisition of any historic property. The Preferred Alternative would not result in direct or indirect adverse effects to any of the 53 historic properties within the APE as historic properties would retain overall integrity of setting, feeling, and association.

There is a low potential for excavation to encounter undiscovered buried archaeological resources. The maximum expected excavation depth is 16 feet for light poles and potential underground sewer line relocations. Protocols for the discovery of unanticipated archaeological and paleontological resources are set forth in Section 4.5.5 of the Final EIS and Attachment 2 of this ROD.

FTA determined that the Preferred Alternative would have no adverse effect on historic properties, either historic architectural resources or archaeological resources, within the APE and the State Historic Preservation Officer (SHPO) concurred with this finding in a letter, dated October 17, 2017, which is included in Attachment 3 of this ROD.

Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. 303)

Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. 303) is intended to avoid use through the permanent incorporation of land of public park and recreational areas, wildlife and waterfowl refuges, and historic properties.

The Preferred Alternative would not result in the use of or permanent incorporation of any park or recreational Section 4(f) resources since the project would be located entirely within the existing Geary corridor or immediately adjacent sidewalk areas where no public parks or recreational facilities exist.

The Preferred Alternative would make streetscape improvements in the vicinity of four historic resources that are considered historic Section 4(f) properties: the “Golden Triangle” light standards are eligible for the NRHP and thus treated here as a Section 4(f) property, the lighting standards associated with the Japan Center, the Auxiliary Water Supply System (AWSS), and the St. Francis Square Cooperative. The Preferred Alternative may require the removal and relocation of the Golden Triangle streetlights and Japan Center lighting standards, as well as components of the AWSS. The relocation these historic properties would be considered a direct use; however, these historic properties would retain overall integrity of setting, feeling, and association. Measures to minimize harm, such as avoidance, minimization, mitigation, and enhancement measures, were developed in coordination with the SHPO for these properties. With these measures, the Preferred Alternative would result in de minimis impacts to these historic resources. On October 17, 2017, SHPO concurred with FTA’s Section 106 finding that the Preferred Alternative would have “no adverse effect” to historic properties. See Attachment 3 of this ROD.

Temporary occupancy of historic resources may occur under the Preferred Alternative to accommodate construction. Any temporary occupancy would be short in duration (less than the time needed for construction), the scope of the occupancy is minor, neither permanent adverse impacts nor interference with protected features would occur and the
land being used would be fully restored. SHPO has concurred that the Preferred Alternative would not result in any adverse effects to historic properties. Pursuant to 23 CFR Part 774.13(d), such temporary occupancies are so minimal so as to not constitute a use.

Operation and construction noise or vibration would not result in a substantial impairment of the Section 4(f) properties. None of the historic properties require quiet as an essential feature. The Preferred Alternative would not result in a constructive use of Section 4(f) historic properties from other construction or operation of the Preferred Alternative.

There are no previously known intact archaeological resources in the Geary corridor. If any archaeological resources are inadvertently discovered and are subsequently determined to be eligible for the NRHP and warrant preservation in place, a Section 4(f) evaluation would be conducted.

Construction of the pedestrian bulbs would be located within intersections near four Section 4(f) recreational resources: the Japantown Peace Plaza and Pagoda, Hamilton Recreation Center and Playground, Raymond Kimbell Playground, and Sergeant John Macaulay Park. The Park Presidio path exists within the existing discontinuous greenway on the east side of Park Presidio Boulevard. None of the project infrastructure would be located within the park or recreational facility properties. The Preferred Alternative would not result in temporary occupancy of any park or recreational Section 4(f) properties.

Construction activities that may occur adjacent to park and recreation locations are expected to be of short duration and construction noise levels are expected to be below the thresholds identified in FTA’s Transit Noise and Vibration Assessment (2006). Operational noise from the Preferred Alternative would be below FTA noise thresholds. Therefore, pursuant to 23 CFR Part 774.15(f)(5), the Preferred Alternative would not result in a substantial impairment to the activities, features, or attributes that qualify these properties for protection under Section 4(f). No constructive use of Section 4(f) parks and recreational properties from construction or operation of the Preferred Alternative would occur.

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act prohibits the conversion of property acquired or developed with LWCF funds to a non-recreational purpose without the approval of the Department of the Interior’s National Park Service. Two parks – Bush and Baker Mini-Park and the Willie “Woo Woo” Wong Playground – located within a half-mile of the Geary corridor received funding from the LWCF and are thus Section 6(f) resources. However, the Preferred Alternative would not convert either of these properties to non-recreational use. Accordingly, no Section 6(f) properties are adversely impacted by the Preferred Alternative.

Air Quality Conformity

The Preferred Alternative conforms to the Clean Air Act Amendments (40 CFR Part 51) and the final Transportation Conformity Rule (40 CFR Part 93), as documented in Section 4.10.4.1 of the Final EIS. The Preferred Alternative was included in the regional emissions analysis completed by the Metropolitan Transportation Commission (MTC) for the conforming Regional Transportation Plan (2017 RTP; Plan Bay Area 2040). This analysis found that the RTP and, therefore, the individual projects contained in the RTP are conforming projects and will have air quality impacts consistent with those identified in the State Implementation Plan (SIP) for achieving the national ambient air quality standards.
The project was also included in the federal 2017 Transportation Improvement Program (TIP). FHWA and FTA determined the TIP to conform to the SIP on August 23, 2017.

In May 2014, the MTC Air Quality Conformity Task Force confirmed that the Preferred Alternative was not a Project of Air Quality Concern. This confirmation is included as Appendix G to the Final EIS.

Endangered Species Act

No threatened, endangered, or other regulated or sensitive species and no sensitive habitats are known to occur within the Geary corridor. One federally threatened species – the California red-legged frog (*Rana aurora draytonii*) – is known to occur within a half-mile of the Geary corridor; however, the location of this known occurrence is within Golden Gate Park, in which neither construction nor operation of the project would occur. No listed species, no suitable habitat, and no designated critical habitat are located within the Geary corridor. The Preferred Alternative would have no adverse effect to threatened or endangered species.

Clean Water Act and Section 10 of the Rivers and Harbors Act

No natural surface water bodies, wetlands, or streams exist in the Geary corridor or its immediate vicinity. Pursuant to the mitigation measures, the Preferred Alternative will comply with Titles III and IV of the Clean Water Act and National Pollution Discharge Elimination System (NPDES) standards during and following construction. A Notice of Intent would be filed with the State Water Resources Control Board (SWRCB) prior to construction. Prior to construction of the Preferred Alternative, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared and monitored with applicable Best Management Practices (BMPs) to control erosion and ensure against discharge of dirt and pollutants into storm drains. Accordingly, the Preferred Alternative meets the requirements of the Clean Water Act.

Floodplain Management: Executive Order 11988

Executive Order 11988 and USDOT Order 5650.2, requires federal agencies to avoid to the extent possible the long-term and short-term adverse impacts caused by using and modifying floodplains, and to avoid floodplain development wherever there is a practicable alternative. The Preferred Alternative is not located within any 100- or 500-year floodplain; therefore, no modifications to any established floodplains would result from project implementation. The Geary corridor is not located within a mapped flood hazard zone. Accordingly, the Preferred Alternative will not result in adverse flood-related effects or floodplain encroachment.

Executive Order 12898: Environmental Justice

The analysis in the EIS was prepared in compliance with the Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994); the USDOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations (USDOT Order 5610.2(a), May 2, 2012); and FTA’s Circular 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients (August 15, 2012).

Over half of the Census Block Groups in the study area include environmental justice (EJ) populations. The majority of the study area includes Census Block Groups with high
percentages (over 50 percent of the population) of minority populations. The areas with Census Block Groups with the highest percentages of minority populations along the Geary corridor include the Western Addition, Downtown/Civic Center, Chinatown, and South of Market neighborhoods. Japantown and the Fillmore are parts of the Western Addition and the Tenderloin is part of the Downtown/Civic Center.

Eighty-four Census Block Groups in the study area have a proportion of households with incomes that are 150 percent or less of the 2012 U.S. Department of Health and Human Services (HHS) poverty guidelines that exceeds the percentage of such people in the City and County of San Francisco as a whole (21 percent as of 2012). Low-income populations in the study area are found scattered throughout the corridor, but are most prevalent in the Downtown/Civic Center (including the Tenderloin), South of Market, Chinatown, and Western Addition neighborhoods.

After the implementation of avoidance, minimization, and/or mitigation measures, the Preferred Alternative would not have adverse effects for construction and operation in all environmental topic areas except transportation. These topic areas include but are not limited to community impacts, noise/vibration, visual impacts and land use. The Preferred Alternative would not have any adverse effects in these topic areas; therefore, the Preferred Alternative would have no disproportionate adverse effects to EJ populations related to these topic areas.

Following the implementation of avoidance, minimization, and/or mitigation measures, the Preferred Alternative would result in adverse effects related to transportation. Six intersections would operate at an unacceptable level of service in partially EJ and non-EJ communities (defined from 2016 Census data) and two intersections would operate at an unacceptable level of service in entirely EJ communities. The traffic effects would be similar at the impacted intersections. Mitigation measures would be applied similarly in both environmental justice communities and non-environmental justice communities. In contrast, the No Build Alternative would result in 10 adversely impacted intersections in entirely EJ communities. Therefore, in comparison, the Preferred Alternative would not result in disproportionate adverse effects to environmental justice populations.

The environmental justice communities along the corridor would also be the most proximate to the benefits of the project – improved transit service, enhanced neighborhood access and mobility, and better transit reliability and connectivity. These transit access and mobility enhancements in environmental justice communities would offset the adverse effects of traffic that would occur. Other benefits include lower greenhouse gas emissions, decreased pedestrian crossing distances, pedestrian-scale lighting, median-width changes, and improved bus shelters and bulbouts.

Taking both burdens and offsetting benefits into account, the Preferred Alternative would not have disproportionately high and adverse effects on environmental justice populations.

**Transportation Impacts**

The Preferred Alternative would result in adverse effects at the following eight study intersections (4 on-corridor and 4 off-corridor) in the year 2035 and some in the year 2020:

- Parker Street and Geary Boulevard (2035)
- Laguna Street and Geary Boulevard (2020, 2035)
- Gough Street and Geary Boulevard (2020, 2035)
• Van Ness Avenue and Geary Boulevard (2020, 2035)
• California Street and Arguello Boulevard (2035)
• California Street and Presidio Avenue (2035)
• Fulton Street and Stanyan Street (2020, 2035)
• Anza Street and Park Presidio Boulevard (2035)

The Preferred Alternative would decrease the overall parking supply within one to two blocks of the Geary corridor by 3 percent (330 spaces). The Preferred Alternative would reduce public parking (on-street and off-street) in the Masonic Avenue area by 9 percent and in the Japantown/Fillmore Street area by 4 percent. These changes in parking were found not to be adverse given the availability of nearby on- and off-street parking spaces.

No feasible measures exist to reduce impacts from the Preferred Alternative at the above-identified intersections and traffic effects at these intersections would be adverse. Additional information on avoidance, minimization, and mitigation measures for traffic and parking effects are included in Attachment 2 of this ROD.

**Measures to Mitigate Adverse Effects**

All practicable means to avoid or minimize environmental harm have been adopted for the Preferred Alternative. The mitigation commitments are described in the Mitigation Monitoring and Reporting Program (Appendix M of the Final EIS and Attachment 2 of this ROD). Any change in such commitments from the description in the Final EIS will require a review in accordance with 23 CFR Parts 771.129-130 and must be approved by FTA.

Edward Carranza, Jr.
Acting Regional Administrator
Federal Transit Administration, Region IX

Date: Jun 01 2018

Attachment 1: Preferred Alternative -- Hybrid Alternative/LPA
Attachment 2: Mitigation Monitoring & Reporting Program for the Project
Attachment 3: Section 106 Determinations and Findings
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Note: Construction of Class I bicycle lanes between Masonic and Presidio would be part of Phase II (not to scale)
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Mitigation Monitoring & Reporting Program
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<tr>
<th>NO.</th>
<th>AFFECTED RESOURCES</th>
<th>AVOIDANCE, MINIMIZATION, MITIGATION OR IMPROVEMENT MEASURES</th>
<th>IMPLEMENTATION PROCEDURE</th>
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<th>REPORTING RECIPIENT</th>
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<tbody>
<tr>
<td>1(I)</td>
<td>Pedestrian and Bicycle Transportation</td>
<td>I-PED-1. Include WalkFirst pedestrian safety recommendations where possible as part of project design (WalkFirst recommendations described in detail in Appendix D-8).</td>
<td>Final design</td>
<td>SFCTA Planning Department</td>
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<tr>
<td>2(I)</td>
<td>Pedestrian and Bicycle Transportation</td>
<td>I-PED-2. Use Universal Design Principles to inform detailed engineering design of pedestrian and station facilities to enhance access for disabled persons.</td>
<td>Final design</td>
<td>SFCTA</td>
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<td>3(I)</td>
<td>Pedestrian and Bicycle Transportation</td>
<td>I-PED-3. Include state of the practice bicycle safety and design treatments for the Masonic-to-Presidio bicycle connection, including current design guidance from the City’s Bicycle Plan and other state and national sources.</td>
<td>Final design</td>
<td>SFCTA</td>
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<tr>
<td>4(I)</td>
<td>Pedestrian and Bicycle Transportation</td>
<td>I-PED-4. Monitor pedestrian safety on parallel streets to assess if and how changes in traffic volumes affect pedestrian safety, and identify improvements to address safety issues if necessary.</td>
<td>Construction phase</td>
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<td>5(I)</td>
<td>Parking and Loading Conditions</td>
<td>I-PRK-1. On-street parking should be created where bus stops are consolidated or relocated, as feasible.</td>
<td>SFMTA to implement as part of construction planning phase. Per contract specifications, Contractor to implement during construction.</td>
<td>SFMTA</td>
<td>Construction planning phase, construction phase</td>
<td>SFMTA to prepare weekly reports during applicable phase of project construction.</td>
<td>SFCTA</td>
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<tr>
<td>6(I)</td>
<td>Parking and Loading Conditions</td>
<td>I-PRK-2. Additional on-street parking should be provided from lane striping and infill spaces where feasible. With reconfiguration of the street, opportunities would exist to create additional parking spaces, for example by converting parallel spaces to back-in angled spaces where a reduction in the number of travel lanes allows.</td>
<td>SFMTA to implement as part of construction planning phase. Per contract specifications, Contractor to implement during construction.</td>
<td>SFMTA</td>
<td>Construction planning phase, construction phase</td>
<td>SFMTA to prepare weekly reports during applicable phase of project construction.</td>
<td>SFCTA</td>
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<td>7(I)</td>
<td>Parking and Loading Conditions</td>
<td>I-PRK-3. Where removal of curb spaces is necessary, retention and replacement of parking spaces for people with disabilities should be prioritized over retention of all other spaces. Among remaining spaces, retention and replacement of loading spaces shall be prioritized over retention of general and short-term parking spaces. Where feasible, parking spaces for people with disabilities and loading spaces shall be relocated on the same block face as they currently exist. In locations where this is not feasible, such parking spaces and loading spaces should be relocated to the nearest cross street close to its intersection with Geary Boulevard.</td>
<td>SFMTA to implement as part of construction planning phase. Per contract specifications, Contractor to implement during construction.</td>
<td>SFMTA</td>
<td>Construction planning phase, construction phase</td>
<td>SFMTA to prepare weekly reports during applicable phase of project construction.</td>
<td>SFCTA</td>
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<td>8(A)</td>
<td>Parking and Loading Conditions</td>
<td>A-PRK-4. Where there are multiple options available to relocate lost loading spaces, the project team shall work with affected land uses, including businesses owners, to identify which location best meets local loading needs and the purpose and need of the project. If space is not available to relocate loading spaces, then loading spaces shall be consolidated with existing nearby loading zones that have additional capacity.</td>
<td>Final design</td>
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<td>SFCTA</td>
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<tr>
<td>9(M)</td>
<td>Community Impacts</td>
<td>M-CI-C1. A Transportation Management Plan (TMP) that includes traffic rerouting, a detour plan, and public information procedures shall be developed during the design phase with participation from local agencies, other major project proponents in the area, local communities, business associations, and affected drivers. Early and well-publicized announcements and other public information measures would be implemented prior to and during construction to minimize confusion, inconvenience, and traffic congestion. The TMP shall include at minimum the following provisions: * Construction planning shall seek to minimize nighttime construction in residential areas and minimize daytime construction impacts on retail and commercial areas.</td>
<td>SFMTA to implement as part of construction planning phase. Per contract specifications, Contractor to implement during construction.</td>
<td>SFMTA - planning Contractor - construction</td>
<td>Construction planning phase, construction phase</td>
<td>SFMTA to oversee approvals from Caltrans and SFDPW. SFMTA to provide weekly reports on adherence to TMP throughout construction duration.</td>
<td>SFCTA Caltrans SFDPW</td>
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<td>* As part of the TMP public information program, San Francisco Municipal Transportation Agency (SFMTA) shall coordinate with adjacent properties along the Geary corridor to determine the need for colored parking spaces (i.e., loading zones) and work to identify locations for replacement spaces or plan construction activities to minimize impacts from the loss of these spaces. SFMTA shall also coordinate with adjacent properties along the Geary corridor to ensure that pedestrian access to these properties is maintained. The TMP shall incorporate SFMTA’s process for accepting and addressing complaints. This includes provision of contact information for the Project Manager, Resident Engineer, and Contractor on project signage with direction to call if there are any concerns. Complaints would be logged and tracked to ensure they are addressed. The TMP shall identify or otherwise designate adequate passenger and truck loading zones to be maintained for adjacent land uses, including maintaining access to driveways and providing adequate loading zones on the same or adjoining street block face.</td>
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<td>* Project construction shall be phased to reduce the period of disruption at any particular location to the shortest practical length of time. Construction lighting shall be shielded and directed to limit direct illumination to within the area of work and avoid all light trespass. Construction staging and storage areas shall be screened by visually opaque screening wherever they</td>
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<td>10(MIN)</td>
<td>Visual Resources</td>
<td><strong>MIN-VQ-C1.</strong></td>
<td>Per contract specifications, Contractor to implement during construction.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFTMA to provide weekly reports outlining adherence to standards throughout construction duration.</td>
<td>SFCTA</td>
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<p>| 10(MIN) | Visual Resources | <strong>MIN-VQ-C1.</strong> | Per contract specifications, Contractor to implement during construction. | Contractor | Construction | SFTMA to provide weekly reports outlining adherence to standards throughout construction duration. | SFCTA |</p>
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<tr>
<td>11(i)</td>
<td>Visual Resources</td>
<td>I-VQ-2. In order to maximize overall Geary corridor visual unity, a consistent palette of street tree types could be developed, reviewed by City planning staff, and applied throughout the Geary corridor.</td>
<td>Per contract specifications, Contractor to implement during construction.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFTMA to provide weekly reports outlining adherence to standards throughout construction duration.</td>
<td>SFCTA</td>
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<tr>
<td>12(i)</td>
<td>Visual Resources</td>
<td>I-VQ-3. Coordinate with Geary corridor planning efforts of the City planning department. Station design could be coordinated with long-term urban design studies of the City planning department, including studies for the Divisadero to Laguna Street segment of the Geary corridor.</td>
<td>SFCTA Planning Department</td>
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<td>13(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C1. Limit the use of construction equipment that creates high vibration level, such as vibratory rollers.</td>
<td>SFCTA</td>
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<td>14(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C2. Develop and implement a Vibration Reduction and Minimization Plan, which would include the identification of vibration-sensitive structures using distance impact thresholds.</td>
<td>SFCTA to perform independent noise and vibration monitoring. Contractor to implement modifications as needed during project construction, per contract specifications.</td>
<td>Contractor</td>
<td>Final design and construction</td>
<td>SFCTA to provide weekly reports on compliance with City noise ordinance throughout construction duration.</td>
<td>SFCTA</td>
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<tr>
<td>15(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C3. During advanced conceptual engineering or final design phases, an individual assessment of vibration-sensitive structures would be conducted where construction activities and equipment would exceed FTA’s impact distance guidance for category IV structures.</td>
<td>SFCTA to perform independent assessment of vibration-sensitive structures. Contractor to implement modifications as needed during project construction, per contract specifications.</td>
<td>Contractor</td>
<td>Final design and construction</td>
<td>SFCTA to provide weekly reports outlining adherence to standards throughout construction duration.</td>
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<td>16(MIN)</td>
<td>Cultural Resources</td>
<td><strong>MIN-CUL-C4.</strong> Conduct vibration monitoring during construction.</td>
<td>Per contract specifications, Contractor to implement during construction.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFTMA to provide weekly reports outlining adherence to standards throughout construction duration.</td>
<td>SFCTA</td>
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<td>17(A/MIN)</td>
<td>Cultural Resources</td>
<td><strong>A-CUL-C5.</strong> Design proposed stations and stops in the vicinity of the Golden Triangle Streetlights, Japan Center light standards, and components of the AWSS to avoid the removal, relocation, or damage to these historic structures.</td>
<td>SFMTA in coordination with SFDPW and SFPUC with approval by SF Arts Commission and HPC.</td>
<td>SFMTA, SFDPW, SFPUC</td>
<td>Final design</td>
<td>SFMTA to oversee approvals by SF Arts Commission and SF HPC</td>
<td>SFCTA Planning Department</td>
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<td>18(I)</td>
<td>Cultural Resources</td>
<td><strong>I-CUL-C7.</strong> Harmonize the visual qualities of built elements of the project alternatives with adjacent historic properties through careful consideration of design, lighting, materials, and color choices that would complement and be sensitive to nearby historic properties.</td>
<td>SFMTA in coordination with SFDPW and SFPUC with approval by SF Arts Commission and HPC.</td>
<td>SFMTA, SFDPW, SFPUC</td>
<td>Final design</td>
<td>SFMTA to oversee approvals by SF Arts Commission and SF HPC</td>
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| 19(MIN) | Cultural Resources | **MIN-CUL-C8.** Focused archival research will identify any specific areas within the APE that may be likely to contain potentially significant remains, and methods and findings will be documented as an addendum to the current report. The Phase I addendum report will be submitted to the City’s Environmental Review Officer (ERO) and the SHPO for concurrence. Research will be initiated once the project’s APE map is finalized identifying the major Areas of Direct Impact. The Addendum Survey Report would include:  
   * A contextual and documentary research section that addresses the development of urban infrastructure that provides a basis for evaluating potential resources as they relate to the history of San Francisco.  
   * A cut-and-fill reconstruction of the corridor, comparing the modern versus mid-1800s ground surface elevations, to fine-tune the initial prehistoric sensitivity assessment, and refining the location of high-sensitivity locations where prehistoric remains may be preserved.  
   * Relevant profiles and plan views of specific blocks to illustrate the methods used in analyzing available documentation.  
   * Summary and conclusions to provide detailed information on locations that have the potential to contain extant historic-era and prehistoric archaeological remains that might be evaluated as significant resources, if any.  

Two results are possible based on documentary research:  
   * No or low potential for sensitive locations: major Areas of Direct Impact have no potential to retain extant archaeological remains that could be evaluated as significant resources, if any.  
   * Qualified archaeologist to conduct research during final design to inform construction planning and further consultation with SHPO.  

SFCTA to provide qualified archaeologist to implement.  
Final design  
Agencies to submit Addendum Survey Report to SHPO as part of ongoing Section 106 consultation. SFMTA to provide final design and oversee archaeology approvals from the Planning Department. | SFCTA | SHPO | Planning Department |
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<th>NO.</th>
<th>AFFECTED RESOURCES</th>
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<th>IMPLEMENTATION RESPONSIBILITY</th>
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<td>20(MIN)</td>
<td>Cultural Resources</td>
<td><strong>MIN-CUL-C9.</strong> Depending on the results of archival research, in concert with the City’s ERO, project avoidance areas or, more likely, areas requiring presence/absence investigations for cultural resources will be identified and fieldwork undertaken following exposure of the ground surface, but prior to construction to identify buried cultural resources.</td>
<td>Qualified archaeologist to conduct research during final design to inform construction planning and further consultation with SHPO.</td>
<td>SFCTA to provide qualified archaeologist to implement.</td>
<td>Pre-construction</td>
<td>Agencies to submit Addendum Survey Report to SHPO as part of ongoing Section 106 consultation. SFMTA to provide final design and oversee archaeology approvals from the Planning Department.</td>
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<td>21(MIN)</td>
<td>Cultural Resources</td>
<td><strong>MIN-CUL-C10.</strong> A Testing and Evaluation/Treatment Plan, if required, will provide archaeological protocols to be employed immediately prior to project construction to test areas identified as potentially significant or having the potential to contain buried cultural resources. In case such areas might be unavoidable, minimization measures will be proposed. The procedures detailed in the Treatment Plan would be finalized in consultation with the City’s ERO and the SHPO. For historic-era resources, work would initially entail detailed, focused documentary research to evaluate the potential significance of any archaeological material identified during initial research that might be preserved. Significance would be based on the data-</td>
<td>Per contract specifications, qualified archaeologist to instruct construction crews on this procedure prior to start of construction and throughout construction, as needed. Construction crew members to implement if needed during project construction.</td>
<td>SFCTA to provide qualified archaeologist to prepare Testing and Treatment Plan, if required. Contractor or SFMTA to provide qualified archaeologist to implement Testing and Treatment Plan if required.</td>
<td>Construction</td>
<td>Agencies to consult with SHPO on a Testing and Treatment Plan to complete the Section 106 process. SFMTA to monitor instruction and to provide weekly reports of archaeological findings and procedures throughout project construction duration as well as verification of training of all relevant construction crew</td>
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<td>IMPLEMENTATION PROCEDURE</td>
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|     | potential of possible remains applied to accepted research designs. Two results could ensue:  
* No potentially significant remains: if no locations demonstrate the potential for significant remains, no further archaeological testing would be recommended.  
* Potentially significant remains: if any locations have the potential to contain significant remains, then appropriate field methods will be proposed, including compressed testing and data-recovery efforts. Testing will be initiated immediately prior to construction, when there is access to historic ground levels. Should a site or site feature be found and evaluated as potentially significant, data recovery would take place immediately upon discovery if avoidance of the site is still not possible.  
For prehistoric resources, a Treatment Plan will identify relevant research issues for resource evaluation, and pragmatic methods to identify, evaluate, and conduct data recovery if needed. This may include a pre-construction geoarchaeological coring program or a compressed three-phase field effort occurring prior to construction when the ground surface is accessible. | MIN-CUL-C11. Upon completion of all fieldwork, a technical report shall be prepared. This Final Archaeological Resources Report (FARR) shall document all field and laboratory methods, analysis, and findings. The FARR shall be subject to review and approval by the City’s ERO and the SHPO. Copies of the approved FARR shall be submitted to the City’s ERO, the SHPO, and the Northwest Information Center (NWIC), together with any associated archaeological site records. | Qualified archaeologist to prepare report to inform construction planning and further consultation with SHPO. | SFCTA to provide qualified archaeologist to implement. | Pre-construction | Agencies to Submit Addendum Survey Report to SHPO as part of ongoing Section 106 consultation. SFMTA to provide final design and oversee archaeology approvals from the Planning Department. | SFCTA SHPO Planning Department |
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<td>23(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C12. If buried cultural resources are encountered during construction activities, construction will be halted and the discovery area isolated and secured until a qualified archaeologist assesses the nature and significance of the find.</td>
<td>Per contract specifications, construction crews to be instructed on this policy prior to start of construction and throughout construction, and to implement if needed during project construction.</td>
<td>Contractor to provide qualified archaeologist to implement.</td>
<td>Construction</td>
<td>SFMTA to monitor instruction and to provide weekly reports of archaeological findings and procedures throughout project construction duration.</td>
<td>SFCTA SHPO Planning Department</td>
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<td>24(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C13. If human remains are discovered, the County coroner will be notified as soon as is reasonably possible (CEQA Section 15064.5). There will be no further site disturbance where the remains were found. If the remains were determined to be Native American, then the coroner is responsible for contacting the California Native American Heritage Commission (NAHC) within 24 hours. The NAHC, pursuant to Public Resources Code (PRC) Section 5097.98 will notify those persons it believes to be the most likely descendant (MLD). Treatment of the remains will be dependent on the views of the MLD.</td>
<td>Per contract specifications, construction crews to be instructed on this policy prior to start of construction and throughout construction, and to implement if needed during project construction.</td>
<td>Contractor to provide qualified archaeologist to implement.</td>
<td>Construction</td>
<td>SFMTA to monitor instruction and to provide weekly reports of archaeological findings and procedures throughout project construction duration.</td>
<td>SFCTA County Coroner NAHC Planning Department</td>
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<td>25(MIN)</td>
<td>Cultural Resources</td>
<td>MIN-CUL-C14. In the event that paleontological resources are encountered during any phase of project construction, all soil-disturbing activity within 100 feet of the find shall be temporarily halted until a qualified paleontologist can assess the significance of the find and provide proper management recommendations.</td>
<td>Per contract specifications, construction crews to be instructed on this policy prior to start of construction and throughout construction, and to implement if needed during project construction.</td>
<td>Contractor to provide qualified paleontologist to implement.</td>
<td>Construction</td>
<td>SFMTA to monitor instruction and to provide weekly reports of paleontological findings and procedures throughout project construction duration.</td>
<td>SFCTA SHPO Planning Department</td>
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<td>No.</td>
<td>Affected Resources</td>
<td>AVOIDANCE, MINIMIZATION, MITIGATION OR IMPROVEMENT MEASURES</td>
<td>IMPLEMENTATION PROCEDURE</td>
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<td>26(MIN)</td>
<td>Utilities</td>
<td><strong>MIN-UT-1.</strong> BRT construction shall be closely coordinated with concurrent utility projects planned within the Geary corridor.</td>
<td>SFMTA, SFPUC, and SFDPW to implement as part of construction planning phase, including coordination with the Committee for Utility Liaison on Construction and Other Projects (CULCOP) and the San Francisco Street Construction Coordination Center.</td>
<td>SFMTA, SFPUC, and contractor</td>
<td>Permitting and construction (planning phase)</td>
<td>SFMTA to oversee approvals from SFDPW.</td>
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<td>27(MIN)</td>
<td>Utilities</td>
<td><strong>MIN-UT-2.</strong> Inspection and evaluation of sewer pipelines within the project limits shall be undertaken to assess the condition of the pipelines and need for replacement. Drain inlets on the corridor shall also be inspected to assess condition and confirm functionality. Spot repairs or minor replacement-in-place of sewers may be performed during construction of the project if desired by SFPUC and agreed to by SFMTA.</td>
<td>SFMTA and SFPUC to conduct needed sewer inspections during final design.</td>
<td>SFMTA, SFPUC</td>
<td>Final design and construction (planning phase)</td>
<td>SFMTA to oversee approvals from SFDPW.</td>
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<td>28(MIN)</td>
<td>Utilities</td>
<td><strong>MIN-UT-3.</strong> During planning and design, consideration would be given to ensure that Geary corridor station facilities do not prevent access to the underground auxiliary water supply service (AWSS) lines. Adequate access for specialized trucks to park next to gate valves shall be maintained. Gate valves shall not be located beneath medians, station platforms, or sidewalks.</td>
<td>SFMTA, SFDPW, SFPUC, and the San Francisco Fire Department to coordinate and plan during final design, and again for construction planning. Per contract specifications, Contractor to implement during construction.</td>
<td>SFMTA, SFPUC, and the San Francisco Fire Department</td>
<td>Final design and construction</td>
<td>SFMTA to oversee approvals from SFPUC and San Francisco Fire Department. SFMTA to provide weekly reports on accessibility of AWSS lines and gate valves throughout construction duration.</td>
<td>SFCTA</td>
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<td>29(MIN)</td>
<td>Utilities</td>
<td><strong>MIN-UT-4.</strong> In situations where utility facilities are being protected in place, SFMTA shall create a plan to accommodate temporary closure of the transitway and/or stations in coordination with utility providers to allow utility providers to perform maintenance, emergency repair, and upgrade/replacement of underground facilities that may be located beneath project features such as the BRT transitway, station platforms, or curb bulbs. Signage for BRT patrons and safety protocols for Muni operators and utility</td>
<td>SFMTA to coordinate with utility providers, SFDPW, the SFPUC and San Francisco Fire Department during final design to ensure project design considers utility maintenance programs, including those overlapping with project construction.</td>
<td>SFMTA</td>
<td>Final design and construction</td>
<td>SFMTA to oversee approvals from SFPUC, San Francisco Fire Department, and SFDPW.</td>
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<td>No.</td>
<td>Affected Resources</td>
<td>Avoidance, Minimization, Mitigation or Improvement Measures</td>
<td>Implementation Procedure</td>
<td>Implementation Responsibility</td>
<td>Implementation Schedule</td>
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| 30(MIN) | Geology/Soils/Seismic/Topography | MIN-GE-C1. Shoring will be typically required for all cuts deeper than five feet. Shoring design of open excavations must consider the potential surcharge load from neighboring structures. Furthermore, the potential for lateral movement of excavation walls as a result of earthquake-related surcharge load from nearby structures must also be assessed. The following shoring and slope stability BMPs will be implemented during construction:  
  * Heavy construction equipment, building materials, excavated soil, and vehicle traffic shall be kept away from the edge of excavations, generally a distance equal to or greater than the depth of the excavation.  
  * In the event of wet weather, storm runoff shall be prevented from entering the excavation. Excavation sidewalls can be covered with plastic sheeting, and berms can be placed around the perimeter of the excavated areas.  
  * Sidewalks, slabs, pavement, and utilities adjacent to proposed excavations shall be adequately supported during construction. | Per contract specifications, contractor to implement during construction. | Contractor | Construction | SFMTA to oversee cuts and provide weekly reports describing the shoring technique used on all cuts deeper than five feet throughout project construction duration. | SFCTA |
| 31(MIN) | Geology/Soils/Seismic/Topography | MIN-GE-1. A geotechnical consultant shall review the design of the build alternatives and offer recommendations best suited to the build alternative carried forward. Any recommendations provided by the geotechnical consultant shall be incorporated into the final plans, and are likely to include the following:  
  MIN-GE-1a. For lightly loaded structures such as bus stops, canopies, and walls, incorporate geotechnical and/or structural methods to mitigate the effects of liquefaction on the foundations | Per contract specifications, Contractor to implement during design and construction phase, in preparation of construction of station platforms. | Contractor | Final design/permitting/construction | SFMTA to provide weekly report on soil modification treatments throughout project construction duration. | SFCTA |
during final design. The geotechnical mitigation methods may range from recompaction of the upper material to provision of a mechanically stabilized earth (MSE) foundation system. The structural mitigation methods may range from planning for repairs/maintenance after a seismic event to supporting the improvements on mat foundations or interconnected beam foundations to tolerate the anticipated seismic settlement without collapse.

**MIN-GE-1b.** Fill soils shall be overexcavated and replaced with engineered fill as needed.

**MIN-GE-1c.** Deeper foundations shall be designed for station platforms and canopies located in areas of fill or areas mapped as liquefaction areas, as needed.

32(MIN) Hazards and Hazardous Materials

**MIN-HZ-C1.** Prior to construction, a limited Preliminary Site Investigation (Phase I) shall be performed to investigate hazardous materials concerns related to soil, groundwater, and construction materials on the Geary corridor, as identified in this section. Areas where soils will be disturbed during construction shall be sampled and tested for contaminants specific to the hazardous materials concerns identified in that location. Soil analytical results shall be screened against the Regional Water Board’s Environmental Screening Levels (ESLs) and other applicable risk-based standards to determine appropriate actions to ensure the protection of construction workers, future site users, and the environment and also be screened against state and federal hazardous waste thresholds to determine soil management options. Representative samples of exposed shallow soils shall be collected within 30 feet of the edge of the roadway and analyzed for total lead.

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<td>32</td>
<td>Hazards and Hazardous Materials</td>
<td>MIN-HZ-C1. Prior to construction, a limited Preliminary Site Investigation (Phase I) shall be performed to investigate hazardous materials concerns related to soil, groundwater, and construction materials on the Geary corridor, as identified in this section. Areas where soils will be disturbed during construction shall be sampled and tested for contaminants specific to the hazardous materials concerns identified in that location. Soil analytical results shall be screened against the Regional Water Board’s Environmental Screening Levels (ESLs) and other applicable risk-based standards to determine appropriate actions to ensure the protection of construction workers, future site users, and the environment and also be screened against state and federal hazardous waste thresholds to determine soil management options. Representative samples of exposed shallow soils shall be collected within 30 feet of the edge of the roadway and analyzed for total lead.</td>
<td>SFMTA to implement following final design.</td>
<td>SFMTA</td>
<td>Final design/ construction planning</td>
<td>SFMTA to provide a report with findings.</td>
<td>SFCTA Caltrans</td>
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and soluble lead. For example, aerially-deposited lead is a potential concern throughout the Geary corridor, while naturally-occurring asbestos is potentially present in only a small portion of the Geary corridor. Accordingly, samples in all areas shall be analyzed for total and soluble lead; samples from excavation areas overlying serpentinite bedrock shall also be analyzed for asbestos. Additional investigation may be required to fully evaluate potential hazardous materials issues if concerns are identified during the Preliminary Site Investigation. All environmental investigations at the project shall be provided to project contractors, so the findings may be incorporated into their Health and Safety and Hazard Communication Programs.

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<td>33(MIN)</td>
<td>Hazards and Hazardous Materials</td>
<td>MIN-HZ-C2. Prior to construction, groundwater shall be collected in areas near reported hazardous materials release sites and analyzed for TPH and volatile organic compounds if project excavations were to extend into the groundwater in those areas. Hazardous materials releases sites that have affected groundwater near the Geary corridor are located at 3675 Geary Boulevard, 450 Mission Street, and 2130 O'Farrell Street. Additional hazardous materials releases may occur or be discovered in the future. Therefore, an updated review of regulatory agency records shall be conducted prior to the groundwater investigation, to ensure that groundwater that will be encountered during construction is properly investigated.</td>
<td>SFMTA shall implement testing of groundwater prior to construction to inform construction planning. Per contract specifications, Contractor shall adhere to Construction Implementation Plan.</td>
<td>SFMTA</td>
<td>Final design/ construction planning</td>
<td>SFMTA to provide report outlining hazardous building materials and shall include procedures in Construction Implementation Plan. SFMTA to provide weekly reports on adherence to Construction Implementation Plan throughout construction duration.</td>
<td>SFCTA Caltrans</td>
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<td>NO.</td>
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<td>34(MIN)</td>
<td>Hazards and Hazardous Materials</td>
<td>MIN-HZ-C3. A Hazardous Building Materials survey shall be conducted prior to construction. The survey shall minimally sample traffic paint and structures to be demolished or modified.</td>
<td>SFMTA shall implement testing of structures to be demolished prior to construction to inform construction planning. Per contract specifications, Contractor shall adhere to Construction Implementation Plan.</td>
<td>SFMTA</td>
<td>Final design/construction planning</td>
<td>SFMTA to provide report outlining hazardous building materials and shall include procedures in Construction Implementation Plan. SFMTA to provide weekly reports on adherence to Construction Implementation Plan throughout construction duration.</td>
<td>SFCTA Caltrans</td>
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| 35(MIN) | Hazards and Hazardous Materials | MIN-HZ-C4. Based on the findings and recommendations of the Preliminary Site Investigation, the project may need to implement special soil, groundwater, and construction materials management and disposal procedures for hazardous materials, as well as construction worker health and safety measures during construction. In addition to the findings and recommendations of the Preliminary Site Investigation, the following measures shall be implemented prior to construction.  
* Groundwater from dewatering of excavations, if any, should be stored in Baker tank(s) during construction activities and the water should be characterized prior to disposal or recycling.  
* A construction risk management plan should be implemented by contractors with procedures for identifying and mitigating potentially unreported releases of hazardous materials. | Per contract specifications, plan (including special provisions) to be written by Contractor as part of construction planning phase. | Contractor | Construction (planning phase) | SFMTA to oversee approval from Caltrans. SFMTA to provide weekly reports on adherence to plan throughout construction duration. | SFCTA Caltrans |
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<td>36(MIN)</td>
<td>Hydrology and Water Quality</td>
<td>MIN-HY-C1. Any construction work that adversely affects the combined sewer system will require coordination with SFPUC, and construction-related activities shall be consistent with the SFPUC’s Keep it on Site, Pollution Prevention Guide for the Construction Industry.¹</td>
<td>SFMTA shall obtain any needed approval from SFPUC.</td>
<td>SFMTA, SFPUC, and Contractor</td>
<td>Permitting and construction (planning phase)</td>
<td>SFMTA to oversee approvals from SFPUC. SFMTA to provide weekly reports on adherence to Keep it on Site guidelines throughout construction duration.</td>
<td>SFCTA RWQCB</td>
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<td>37(MIN)</td>
<td>Hydrology and Water Quality</td>
<td>MIN-HY-1. Landscape areas shall be designed to minimize and reduce total runoff. Any irrigation and fertilizers shall be used to the minimum extent practicable and feasible.</td>
<td>SFMTA and landscape architects to implement during landscape design. SFDPW to implement water and fertilizer usage during project operation.</td>
<td>SFMTA, SFDPW</td>
<td>Final design and operation</td>
<td>SFMTA to oversee approvals from SF Arts Commission and Planning Department.</td>
<td>SFCTA</td>
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<td>38(MIN)</td>
<td>Noise and Vibration</td>
<td>MIN-NOISE-C1. A Vibration Reduction and Minimization Plan shall be developed to avoid construction vibration damage using all reasonable and feasible means available. The Plan shall provide a procedure for establishing thresholds and limiting vibration values for structures with a potential to be adversely affected. The following steps shall be taken in development of the location-specific vibration reduction plan:</td>
<td>SFMTA to perform independent noise and vibration monitoring. Contractor to implement modifications as needed during project construction, per contract specifications.</td>
<td>Contractor</td>
<td>Final design and construction</td>
<td>SFMTA to provide weekly reports on compliance with City noise ordinance throughout construction duration.</td>
<td>SFCTA</td>
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| 39(MIN) | Noise and Vibration | MIN-NOISE-C2. Project construction shall implement best practices in equipment noise control, including the following:  
* Use newer equipment with improved noise muffling and ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators intact and operational. Newer equipment will generally be quieter in operation than older equipment. All construction equipment should be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers and shrouding).  
* Perform all construction in a manner that minimizes noise. Utilize construction methods or equipment that will provide the lowest level of noise effects.  
* Idling times shall be minimized either by shutting equipment off | Per contract specifications, Contractor to implement during construction. | Contractor | Construction | SFMTA to provide weekly reports outlining adherence to standards throughout construction duration. | SFCTA |
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<td>40(MIN)</td>
<td>Noise and Vibration</td>
<td>MIN-NOISE-C3. Project construction will conduct truck loading, unloading, and hauling operations so that noise and vibration are kept to a minimum by carefully selecting routes to avoid passing through residential neighborhoods to the greatest possible extent.</td>
<td>Per contract specifications, Contractor to implement daily during project construction.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFMTA to provide weekly reports on adherence to noise and vibration minimization practices throughout construction duration.</td>
<td>SFCTA</td>
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<td>41(MIN)</td>
<td>Noise and Vibration</td>
<td>MIN-NOISE-C4. Perform independent noise monitoring in sensitive areas, as needed, to demonstrate compliance with applicable noise limits. Require contractors to modify and/or reschedule their construction activities if monitoring determines that maximum limits are exceeded at residential land uses per the City Noise Ordinance.</td>
<td>SFMTA to perform independent noise and vibration monitoring. Contractor to implement modifications as needed during project construction, per contract specifications.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFMTA to provide weekly reports on compliance with City noise ordinance throughout construction duration.</td>
<td>SFCTA</td>
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<td>42(MIN)</td>
<td>Noise and Vibration</td>
<td>MIN-NOISE-C5. Temporary sound walls, curtains, or other noise canceling technologies may be used in locations where sensitive receptors could experience construction-related noise exceedances.</td>
<td>Per contract specifications, Contractor to implement daily during project construction.</td>
<td>Contractor</td>
<td>Construction</td>
<td>SFMTA to provide weekly reports on adherence to noise and vibration minimization practices throughout construction duration.</td>
<td>SFCTA</td>
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<td>43(MIN)</td>
<td>Biological Resources</td>
<td>MIN-BO-C1. Mature trees shall be preserved and incorporated into the project landscape plan as feasible, as well as the planting of replacement trees and landscaping. For each tree removed, a replacement tree is required.</td>
<td>A qualified arborist will be on the landscape design team to work with SFMTA and SFPW staff to identify preservation opportunities for mature trees.</td>
<td>Qualified arborist, SFMTA, SFPW</td>
<td>30% design through final design</td>
<td>SFMTA to provide CER, final design, and oversee project approvals from SFPFW Bureau of Urban Forestry.</td>
<td>SFCTA</td>
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<td>44(MIN)</td>
<td>Biological Resources</td>
<td>MIN-BO-C2. To preclude potential effects under the MBTA, tree removal shall occur outside nesting bird season (February 1</td>
<td>Per contract specifications, a qualified wildlife biologist will implement</td>
<td>Contractor will provide a qualified</td>
<td>Pre-construction/construction</td>
<td>SFMTA to provide weekly report throughout project</td>
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through August 31). Regardless of time of year, preconstruction surveys shall be performed prior to tree removal to determine occurrence of nesting birds. If active protected bird nests are encountered during preconstruction surveys, no-disturbance buffers would be created around active protected bird and/or raptor nests during the breeding season, or until it is determined that all young have fledged. Typical buffers include 500 feet for raptors and 50 feet for passerine nesting birds. The size of the buffer zones and types of construction activities restricted in these areas may be further modified during consultation with CDFW, and shall be based on existing noise and human disturbance levels at the project site. Nests initiated during construction are presumed to be unaffected, and no buffer will be necessary. The “take” of any individual protected birds shall be prohibited. Monitoring of active nests when construction activities encroach upon established buffers may be required by CDFW.

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<td>45(MIN)</td>
<td>Biological Resources</td>
<td>MIN-BO-C3. Seed palettes used for revegetation of disturbed areas shall be reviewed to prevent introduction of invasive species to the site. Follow-up site maintenance shall include a protocol for landscaping staff to recognize weeds and perform maintenance in a manner that prevents weed establishment.</td>
<td>Qualified landscape architect will exclude noxious weeds from landscape plan.</td>
<td>Qualified landscape architect provided by SFMTA.</td>
<td>Final design</td>
<td>SFMTA to provide final design and oversee project approvals from SFDPW Bureau of Urban Forestry.</td>
<td>SFCTA</td>
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FTA to SHPO 04/27/15
SHPO to FTA 05/28/15
FTA to SHPO 09/13/16
FTA to SHPO 10/27/16
SHPO to FTA 12/06/16
FTA to SHPO 09/14/17
SHPO to FTA 10/17/17
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Carol Rowland-Nawi  
State Historic Preservation Officer  
Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

Subject: Section 106 Consultation – SFMTA Geary BRT Project, San Francisco, California

Dear Dr. Roland-Nawi,

The San Francisco Municipal Transportation Agency (SFMTA) is proposing the construction and implementation of bus rapid transit (BRT) service along Geary Street and Boulevard (Project). The Project will be a federal undertaking because the Federal Transit Administration (FTA) would provide financial assistance, and as such, FTA is initiating consultation with the State Historic Preservation Officer (SHPO), under Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation found in 36 CFR Part 800 and request your concurrence with the proposed Area of Potential Effect (APE) and concurrence on the eligibility of properties for the National Register of Historic Places (NRHP). Also enclosed are technical reports prepared for this undertaking.

FTA, the San Francisco County Transportation Authority (SFCTA), and partner agency SFMTA met with your staff (Kathleen Forrest and Patrick Riordan) on March 23, 2015 to provide a project overview and to discuss the Section 106 consultation process. We would also like to invite you and your staff for a site visit of the alignment in the near future.

**Description of Undertaking**

The proposed undertaking would construct and operate BRT service along dedicated lanes within various locations of San Francisco’s Geary corridor, as described below. The proposed undertaking would include BRT-branded bus service as well as physical transit infrastructure improvements such as transit signal priority, pavement resurfacing, new and relocated stations, curb ramp and corner bulb installation. **Attachment A** depicts the Geary corridor.

The EIS/EIR assesses four build alternatives as well as a “No Build” alternative. Each includes some form of BRT service and various physical improvements, generally outlined as follows:

**No Build Alternative**

- No new BRT service or related physical infrastructure improvement.
  Existing SFMTA 38 Local, 38 Limited, and 38 Express routes would
continue to operate in mixed-flow lanes. However, the Geary corridor would see previously planned/programmed transit and infrastructure improvements.

**Alternative 2: Side-Lane BRT**

- BRT service would replace the existing 38 Limited service; local and express bus service would operate.
- From the Transbay Terminal to 34th Avenue, buses would operate in dedicated side-running bus-only lanes replacing the existing outside travel lanes of the Geary corridor, next to the existing curbside parking lane that would remain at most locations.
- Between 34th Avenue and 48th Avenue, no bus-only lanes would be constructed; all buses would operate in mixed-flow lanes.
- Existing 38 Local service would also operate in the dedicated bus lanes but would pull out of them to service curbside local bus stops, enabling BRT buses to pass.

**Alternative 3: Center-Lane BRT with Dual Medians and Bus Passing Lanes**

- BRT, local, and express buses would operate.
- This alternative would be different from Alternative 2 from Gough Street to 27th Avenue. There, BRT and local service would operate in dedicated bus-only lanes in the center of the Geary corridor. A bus passing lane at local bus stops would enable BRT buses to pass local buses that are stopped to load and unload passengers.
- In all other locations, this alternative would be similar to Alternative 2.

**Alternative 3-Consolidated: Center-Lane BRT with Consolidated Bus Stops, Dual Medians, and No Bus Passing Lanes**

- Same as Alternative 3; however, BRT service would replace both 38 Limited and 38 Local service as a new consolidated service, eliminating the need for bus passing lanes.

**Hybrid Alternative**

- Incorporates various physical features of Alternatives 2 and 3 Consolidated in different segments, combined to provide a mix that intends to maximize benefits and minimize impacts.
- BRT, local, and express buses would operate.
  - From the Transbay Terminal to Palm Street, local and BRT buses would operate in existing or new side-running bus-only lanes.
  - Between Palm Street and 27th Avenue, local and BRT buses would operate in dedicated bus-only lanes in the center of the Geary corridor, with no bus passing lanes. Every stop would serve both local and BRT buses.
  - Between 27th Avenue and 34th Avenue, all buses would operate in new side-running bus-only lanes.
• Between 34th Avenue and 48th Avenue, no bus-only lanes would be constructed; all buses would operate in mixed-flow lanes.
  o In side-running portions of the corridor, BRT buses would have the ability to pass local buses at local stops.

As indicated in our meeting with your staff on March 23, SFCTA and SFMTA staff have identified the Hybrid Alternative as the Staff-Recommended Alternative; the Draft EIS/EIR will reflect this identification. SFCTA and SFMTA staff members further anticipate that their respective Boards will ultimately select the Hybrid Alternative as the Locally Preferred Alternative at some time subsequent to publication of the Draft EIS/EIR.

Area of Potential Effect

Archaeology: The project archaeological APE covers approximately 131 acres in the Geary corridor. The APE includes the full width of the street and is fully contained within the public right-of-way, comprising the full length of the 38 Local and 38 Limited routes from 48th Avenue (on the west) to the Transbay Terminal (on the east). This includes the entirety of Geary Boulevard/Geary Street and portions of O’Farrell Street, Market Street, Mission Street, and First Streets. In areas where proposed improvements would be confined to the street itself, the APE is set to the curb-to-curb width of the corridor. In areas where a new or relocated curbside bus stop is proposed, the APE expands outwardly to encompass the entirety of the public right-of-way, including the sidewalk.

The horizontal extent of the archaeological APE is presented in Attachments B.1-B.4 by alternative. The APE covers the entire Environmental Study Limits and is labeled as such in Attachments B.1-B.4 (note that in the archaeological sensitivity report that this is also referred to as the Study Area).

The vertical extent for the archaeological APE has not been finalized, nor have potential areas of direct impact been precisely identified. However, as indicated in Table 1 below showing anticipated excavation depths by project feature, it is anticipated that maximum depths throughout the corridor would generally not exceed 16 feet (4.9 meters) below modern ground surface. This depth corresponds to the anticipated excavation required for new and/or relocated street lights and traffic signal poles, which would be dispersed throughout the entire length of the corridor in all build alternatives.

In the vicinity of Fillmore Street, two of the build alternatives (Alternatives 3 and 3-Consolidated) contemplate raising the level of Geary Boulevard to match surrounding streets and would thus convert the now grade-separated Fillmore Street underpass to a single-level intersection. If one of these alternatives is selected, additional excavation may be necessary in this area to decommission and/or remove an existing pump station that was installed at the time the Fillmore Street underpass was created in 1961.
<table>
<thead>
<tr>
<th>CONSTRUCTION ITEM</th>
<th>APPROXIMATE AREA</th>
<th>DEPTH (FEET)</th>
<th>APPLICABILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geary Underpass of Fillmore Street: Pump Station - Fuel Tank Removal</td>
<td>12-ft by 12-ft excavation</td>
<td>30</td>
<td>Only Alternatives 3 and 3-Consolidated - Fillmore Street underpass only</td>
</tr>
<tr>
<td>Street Lights, Pedestrian Scale Lights, and Traffic Signal Poles</td>
<td>3-ft by 3-ft excavations per Light Pole</td>
<td>16</td>
<td>Dispersed widely in all alternatives - those incorporating center-running bus lanes as well as modified curb side bus stops</td>
</tr>
<tr>
<td>Sewer Replacement</td>
<td>8-ft wide by 240-ft excavations per block</td>
<td>16</td>
<td>Only Alternatives 3, 3-Consolidated, and Hybrid; only between 12&lt;sup&gt;th&lt;/sup&gt; and 15&lt;sup&gt;th&lt;/sup&gt; Avenues</td>
</tr>
<tr>
<td>Geary Underpass and Pump Station Removal (Upper Portion Only)</td>
<td>8-ft wide by 100-ft (Blue Book limit)</td>
<td>12</td>
<td>Only Alternatives 3 and 3-Consolidated - Fillmore Street underpass only</td>
</tr>
<tr>
<td>Catch Basin with Inlet</td>
<td>6-ft by 6-ft excavation</td>
<td>8</td>
<td>Dispersed widely in alternatives with center-running bus lanes as well as select curb bulb-out locations</td>
</tr>
<tr>
<td>Hydrant Relocation</td>
<td>5-ft by 5-ft excavation</td>
<td>8</td>
<td>All alternatives involving new /modified curb side bus stops</td>
</tr>
<tr>
<td>Shelter Canopy Foundation</td>
<td>3-ft by 3-ft excavation per Canopy Post</td>
<td>1</td>
<td>All alternatives involving new /modified curb side bus stops</td>
</tr>
<tr>
<td>Median Platform</td>
<td>9-ft – 6-in wide by 240-ft long per block</td>
<td>3</td>
<td>Dispersed widely in alternatives with center-running bus lanes</td>
</tr>
<tr>
<td>New Center Median</td>
<td>Typically 10-ft wide by 240-ft long per block</td>
<td>3</td>
<td>Dispersed widely in alternatives with center-running bus lanes</td>
</tr>
<tr>
<td>Center Running Bus Lanes (New pavement section for 2 lanes)</td>
<td>26-ft to 240-ft long per block</td>
<td>3</td>
<td>Dispersed widely in alternatives with center-running bus lanes</td>
</tr>
<tr>
<td>Surface Mounted Utility (SMU) Foundation</td>
<td>3-ft by 5-ft excavations per SMU</td>
<td>3</td>
<td>All alternatives involving new /modified curb side bus stops or center-running bus lanes</td>
</tr>
<tr>
<td>BRT Bus Bulb</td>
<td>Typically 8-ft wide by 240-ft long per block</td>
<td>1.5</td>
<td>All alternatives involving new /modified curb side bus stops</td>
</tr>
<tr>
<td>CONSTRUCTION ITEM</td>
<td>APPROXIMATE AREA</td>
<td>DEPTH (FEET)</td>
<td>APPLICABILITY</td>
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<td>-----------------------------------</td>
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<td>------------------------------------------------------------</td>
</tr>
<tr>
<td>Local Bus Bulb</td>
<td>Typically 8-ft wide by 195 ft long</td>
<td>1.5</td>
<td>All alternatives involving new/modified curbside bus stops</td>
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<tr>
<td>Pedestrian Crossing Bulb</td>
<td>40-ft by 8-ft at corners; 8-ft wide by 60-ft long at midblock</td>
<td>1.5</td>
<td>All alternatives</td>
</tr>
<tr>
<td>Side Running Bus Lane Pavement</td>
<td>13-ft wide by 240-ft long excavations</td>
<td>1</td>
<td>All alternatives</td>
</tr>
<tr>
<td>Rehabilitation</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Built Environment/Historic Architecture:** The built environment or architectural APE generally follows the same boundary as the archaeological APE, encompassing the street width from curb to curb and fully within the public right-of-way, with the exception of areas where a new side or relocated curbside bus stop is proposed, at which the architectural APE expands outwardly to encompass one adjacent parcel. In the case of the Kearny/Market/Mason/Sutter Conservation District and the Uptown Tenderloin Historic District, the APE encompasses only those portions of the districts directly fronting proposed side BRT stations and/or new or moved local stops. **Attachment C** depicts the proposed architectural APE.

**Research Method**

The Northwest Information Center (NWIC) at Sonoma State University conducted a search of archaeological resources on February 9, 2009 and November 7, 2011. Additionally, the NWIC conducted a records search in May 2009 and September 2013 for historical structures within the APE. Historical specialists conducted field reconnaissance to account for all buildings, structures, objects that appeared to be 45 years of age or greater and to confirm the current condition of properties already listed or determined eligible for listing in the NRHP and/or CRHR, California Historical Landmarks, and the California Points of Historic Interest.

Furthermore, consultation with the Native American Heritage Commission (NAHC) was initiated in a letter dated November 21, 2008. A NAHC representative responded on December 5, 2008 that no Native American cultural resources were reported from the Sacred Lands file records search. The NAHC provided a list of six interested Native American groups and individuals; all of whom were sent letters on December 8, 2008. A second letter was sent on October 21, 2011 to inform contacts of the undertaking’s expansion. No responses were received for either correspondence, but FTA will formally invite appropriate tribes to consult for purposes of Section 106 compliance.
Request for SHPO Review, Comments, and Concurrence
FTA hereby requests SHPO’s comments on the enclosed APE mapping as well as SHPO’s comments on two cultural resources technical reports prepared for this undertaking. These reports are attached and include:

Attachment D: Historic Resources Inventory and Evaluation Report (HRIER)
Attachment E: Archaeological and Native American Cultural Resources Sensitivity Assessment

According to the attached HRIER, the St. Francis Cooperative is the only historic resource within the APE that has been found eligible for individual listing in the NRHP and the CRHR as a result of this study. The St. Francis Square Cooperative is a low-income housing development constructed in 1963 as part of the City’s redevelopment effort of the Western Addition, as further discussed in the Department of Parks and Recreation (DPR) form 523A on page 391 of the HRIER. The HRIER also identifies 20 additional properties in the APE as eligible for the NRHP and CRHR through earlier survey efforts. As a result, FTA also requests SHPO’s concurrence on the eligibility determination for this particular resource.

Thank you for your assistance in this undertaking. If you have any questions or concerns, please contact Alex Smith at (415) 744-2599.

Sincerely,

[Signature]
Leslie T. Rogers
Regional Administrator

Copy (by email): Britt Tanner, SFMTA

Enclosures: Attachment A – Geary Corridor Study Area
Attachment B.1-B.4 – Archaeological APE (by alternative)
Attachment C – Architectural APE
Attachment D – Historic Resources Inventory Evaluation Report (HRIER)
Attachment E – Archaeological & Native American Cultural Resources Sensitivity Assessment
May 28, 2015

Leslie Rogers
Regional Administrator
Federal Transit Administration
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

Re: Section 106 Consultation for the Geary Boulevard Bus Rapid Transit (BRT) Project, City and County of San Francisco, CA

Dear Mr. Rogers:

Thank you for your letter of April 17, 2015, initiating consultation for the above-referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. The Federal Transit Administration (FTA) is requesting my comments on the Area of Potential Effect (APE) for the undertaking, comments on the two cultural resources reports included with your letter, and concurrence with the determination of eligibility for the St. Francis Square Cooperative. Included with your letter were:

- Draft Historic Resources Inventory and Evaluation Report, Geary Corridor Bus Rapid Transit (BRT) Project, San Francisco, California (HRIER, JRP, March 2014)
- Archaeological and Native American Cultural Resources Sensitivity Assessment for the Geary Corridor Bus Rapid Transit Project, San Francisco, California (Far Western, May 2014)

FTA is providing funding to the San Francisco Municipal Transit Agency’s (SFMTA) for the construction and implementation of BRT service along Geary Street and Geary Boulevard. The undertaking would construct and operate BRT service along dedicated lanes within various locations of San Francisco’s Geary corridor, including physical transit infrastructure improvements such as transit signal priority, pavement resurfacing, new and relocated stations, and curb ramp and corner bulb installation. The SFMTA is currently analyzing multiple alternatives; however the Staff-Recommended Alternative is the Hybrid Alternative described in your letter.

FTA has delineated the APE for archaeology and the built environment. The archaeological APE covers approximately 131 acres in the Geary corridor, including the public right-of-way (ROW) including the full width of the street and the full length of the 38 Local and 38 Limited routes, from 48th Avenue (west) to the Transbay Terminal (east). This includes the entirety of Geary Boulevard/Geary Street and portions of O’Farrell Street, Market Street, Mission Street, and First Streets. In areas where proposed improvements would be confined to the street itself, the APE is set to the curb-to-curb width of the corridor. In areas where a new or relocated curbside bus stop is proposed, the APE expands to encompass the entirety of the public ROW, including the sidewalk. The maximum depth of ground disturbance has not been precisely identified, but would generally not exceed 16 feet below modern ground surface.
The built environment APE is generally the same as the archaeological APE described above, with the exception of areas where a new side or relocated curbside bus stop is proposed, at which the APE expands outwardly to encompass one adjacent parcel. In the area of the Kearny/Market/Mason/Sutter Conservation District and the Uptown Tenderloin Historic District, the built environment APE encompasses only those portions of the districts directly fronting proposes side BRT stations and/or new or moved local stops. Both the archaeological and built environment APE is subject to refinement once an alternative is chosen.

After reviewing the information submitted with your letter, I offer the following comments:

- I concur that the Area of Potential Effect (APE) as represented in the attachments to your letter is appropriate.
- I have no comments on the identification documents at this time. The identification efforts to date appear adequate.
- As the HRIER is in draft form, I cannot offer formal concurrence regarding the eligibility of the St. Francis Square Cooperative at this time. Once the report is finalized, please resubmit it for concurrence on eligibility determinations.

Thank you for considering historic properties in your planning process, and I look forward to continuing this consultation with you. If you have any questions, please contact Kathleen Forrest of my staff at (916) 445-7022 or e-mail at kathleen.forrest@parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer
Ms. Carol Roland-Nawi  
State Historic Preservation Officer  
Office of Historic Preservation  
California Department of Parks and Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816  
Attention: Dr. Susan Stratton and Kathleen Forrest, Project Review Unit

Re: Request for Concurrence on Eligibility of a Historic Resource and Finding of No Adverse Effect for Geary Bus Rapid Transit Project, San Francisco, California (FTA_2015_0423_001)

Dear Ms. Roland-Nawi:

The Federal Transit Administration (FTA) is continuing Section 106 consultation for the Geary Bus Rapid Transit (BRT) Project and is submitting a final Historic Resources Inventory and Evaluation Report (HRIER) and Finding of Effect (FOE) for your concurrence. Along with final HRIER and FOE, this letter provides updates and clarifications on the NEPA/CEQA process for the Project and requests concurrence from the California State Historic Preservation Office (SHPO) for eligibility of historic resources for the National Register of Historic Places (NRHP) and determination of no adverse effects to historic resources, pursuant to Section 106 of the National Historic Preservation Act (NHPA).

Project Description

SFMTA, in cooperation with FTA and SFCTA, proposes to implement BRT improvements along the City of San Francisco’s Geary Street corridor. The Project would be located along the entire six-mile length of the Geary corridor, a primary east-west roadway and transit spine across the northern neighborhoods of San Francisco. The corridor is comprised of: Geary Boulevard, a two-way arterial between 48th Avenue and Gough Street; and the pair of one-way streets between Gough and Market Street including Geary Street, which runs westbound, and its companion, O’Farrell Street, which runs eastbound one block south of Geary Street. The corridor also includes Geary bus line routing between Market Street and the Transbay Terminal, although the Project does not propose infrastructure changes in this portion of the corridor.

On October 1, 2015 letters were sent to the following Native American tribal leaders per 36 CFR 800.2(c)(4) in order to help identify prehistoric sites, sacred sites, and/or traditional cultural properties located in the vicinity of the project area: Jakki Kehl (representative of the Ohlone/Costonoan Tribe), Irene Zwierlein (Chairperson of the Amah/Mutsun Tribal Band), Ann
Marie Sayers (chairperson of the Indian Canyon Mutsun Band of Costonoan), Rosemary Cambra (chairperson of the Muwekma Ohlone Indian Tribe of the SF Bay Area), Romana Garibay (representative of the Trina Marie Ruano Family), and Andrew Galvan (representative of the Ohlone Indian Tribe). No responses to these letters were received.

**Update on NEPA/CEQA Process**

FTA and SFMTA/SFCTA issued a Draft EIS/EIR for the Project on October 2, 2015. The comment period for the NEPA/CEQA and Section 106 materials closed 59 days later on November 30, 2015. Nearly 300 individual pieces of correspondence were received with several hundred public comments in total. The Draft EIS/EIR identified the Hybrid Alternative as the Staff-Recommended Alternative. Based on public comments received, SFMTA/SFCTA have identified three modifications to the Hybrid Alternative as follows.

**Spruce/Cook bus stop changes.** The LPA no longer adds a BRT stop to the Spruce-Cook block of Geary Boulevard. The existing eastbound and westbound bus stops on this block would remain and their lengths would be reduced slightly. These bus stops would serve Local-only buses rather than Local and Rapid buses under the existing service plan, which would increase the distance between Rapid bus stops.

**Webster Street bridge.** The existing pedestrian bridge at Webster Street would remain standing and open for use. In addition, the LPA would add two pedestrian surface crossings on either side of the bridge; a straight crossing on the west side of the intersection and a staggered crossing on the east side. The staggered crossing would improve pedestrian sight distance at the westbound frontage road, as pedestrians would cross in front of the existing bridge piers so they would not be obstructed behind the pier when crossing. Signal timing would be designed to allow pedestrians to cross in one cycle, with multiple wide medians providing pedestrian refuge areas. A pedestrian barrier would be installed on the center median of the staggered crossing to guide pedestrians to the second crossing.

**Additional pedestrian crossing improvements at various intersections along the Geary corridor.** The Hybrid Alternative had proposed to construct 51 pedestrian crossing bulbs at high-priority locations in the Geary corridor as detailed in the project plans (Appendix A), for a total of 65 (No Build plus Build Alternatives). Modifications to the Hybrid Alternative would add a further 26 pedestrian bulbs, plus a painted safety zone, and also implement daylighting at strategic intersection locations along the Geary corridor, both on the corridor streets themselves and on side streets at corridor intersections.

All of the proposed changes to the Hybrid Alternative would occur within public right-of-way areas. None of the proposed changes would alter the APE or involve any new effects to historic resources relative to what the Draft EIS/EIR identified for the Hybrid Alternative. Therefore, no changes to the HRIER or FOE are needed.

**Request for Concurrence**

In accordance with 36 CFR 800.4, FTA requests the SHPO's concurrence on the eligibility of the St. Francis Cooperative. Per the attached HRIER and FOE, the St. Francis Cooperative is the only historic resource within the APE that has been found eligible for individual listing in the NRHP and the CRHR as a result of this study. The St. Francis Square Cooperative is a low-income housing development constructed in 1963 as part of the City's redevelopment effort of the Western Addition, as further discussed in the Department of Parks and Recreation (DPR) form 523A on page 491 of the HRIER. The HRIER also identifies 20
additional properties in the APE as eligible for the NRHP and CRHR through earlier survey efforts. As a result, FTA requests SHPO’s concurrence on the eligibility determination for this particular resource.

The FOE applies the criteria of adverse effect per, 36 CFR 800.5(a)(1) for the proposed undertaking and concludes that the undertaking would result in no adverse effect to the 52 historic properties and historic district within the architectural APE. Therefore, in accordance with 36 CFR 800.5, FTA requests SHPO’s concurrence that the proposed undertaking would result in no adverse effect on historic resources.

We look forward to receiving your concurrence within 30 days of your receipt of this submittal. Thank you for your assistance in this undertaking. If you have any questions or concerns, please contact Alex Smith at (415) 734-9472.

Sincerely,

[Signature]

Leslie T. Rogers  
Regional Administrator

Attachments: A – Final HRIER, B – Finding of Effect (FOE)
Ms. Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
California Department of Parks and Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816  
Attention: Kathleen Forrest, Historian  

Re: Supplemental Information for Eligibility of a Historic Resource and Finding of Effect for Geary Bus Rapid Transit Project, San Francisco, CA  
(FTA_2015_0423_001)  

Dear Ms. Polanco:  

The Federal Transit Administration (FTA) is continuing consultation under Section 106 of the National Historic Preservation Act and is supplementing our September 13, 2016 letter. The purpose of this letter is to provide additional information with respect to archaeological resources for the Geary Bus Rapid Transit (BRT) Project (Undertaking) and request your concurrence on the finding of no adverse effect on historic properties for this Undertaking.  

Description of the Undertaking  
The Hybrid Alternative represents the local agency staff recommended alternative that would be recommended to local legislative boards as the Locally Preferred Alternative. The Hybrid Alternative will operate within dedicated bus-only lanes along most of the Geary corridor. These lanes would be side running from Market Street, through the Inner Geary area, across the Fillmore District and Masonic Avenue. At Palm/Jordan Avenues, the bus-only lanes would transition to center running. This configuration would extend west to 27th Avenue. At 27th Avenue, bus-only lanes would revert to side-running until reaching 34th Avenue. BRT service would extend from the Transbay Transit Center to 48th Avenue, but from 34th to 48th Avenue buses would operate in mixed-flow travel lanes. Bus lanes and all related ancillary improvements would be implemented entirely within public right-of-way areas on the Geary corridor and intersecting streets. Two elements are no longer included with Hybrid Alternative the Hybrid Alternative: removal of the Webster Street pedestrian bridge and replacement of two local bus stops with new BRT stops at Spruce/Cook Streets. The Undertaking will not alter the pedestrian bridge or the two bus stops.
Archeological Resources Identification Efforts
On April 17, 2015, FTA submitted a letter to your office that delineated an archaeological area of potential effect (APE) and provided an Archaeological & Native American Cultural Resources Sensitivity Assessment for the Undertaking. On May 28th, 2015, your office concurred on the delineation of the APE and indicated that the identification efforts were adequate.

The sensitivity assessment examined the likelihood of encountering previously unrecorded or unknown archaeological resources during excavation. The sensitivity assessment identified 244 archaeological projects that have taken place within the records search area. These studies documented 26 formally recorded archaeological resources (including both prehistoric and historic-era sites) along with five potential/not formally recorded archaeological resources. No archeological resources were documented as extending into or within the APE.

No Native American cultural resources were reported from the Native American Heritage Commission sacred lands file records search. Nor were any areas of Native American concern identified by the list of Native American contacts provided by the Commission. The SFCTA sent letters to Native American contacts in 2009 and again in 2011. Consistent with 36 CFR 800.2(c)(4), FTA sent invitations regarding government to government consultation on October 1, 2015 to the following Native American tribal leaders in order to help identify prehistoric sites, sacred sites, and/or traditional cultural properties located in the vicinity of the project area: Jakki Kehl (representative of the Ohlone/Costonoan Tribe), Irene Zwierlein (Chairperson of the Amah/Mutsun Tribal Band), Ann Marie Sayers (chairperson of the Indian Canyon Mutsun Band of Costonoan), Rosemary Cambra (chairperson of the Muwekma Ohlone Indian Tribe of the SF Bay Area), Romana Garibay (representative of the Trina Marie Ruano Family), and Andrew Galvan (representative of the Ohlone Indian Tribe). No responses to these letters were received.

The sensitivity assessment indicated no or low potential exists to encounter undiscovered buried archaeological resources for the most of the APE. Two exceptions to this general assessment of low sensitivity are mid-nineteenth century area near the old Yerba Buena Cove, and the stretch of Geary between Masonic and Gough widened in the 1960s. However, any high potential for historic resources is tempered by earlier extensive ground disturbance and construction associated with the construction of the Fillmore underpass (and associated pump station) as well as the Masonic tunnel, which opened in 1974.

Effects Evaluation
As documented in the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR), the maximum depth of disturbance for the Undertaking would be 16 feet for the installation of street lights/traffic signal poles, sewer replacement, and pedestrian-scale lights. Shelter canopies would require excavating up to 1.5 feet while bus bulb-outs would be up to 1 foot. Excavation of up to 16 feet would occur in areas considered to have low potential to yield prehistoric archaeological resources and higher potential for encountering historic-era resources, particularly between Masonic Avenue and Gough Street. However, as noted above, these areas have been the subject of extensive ground disturbance and construction associated with the construction of the Fillmore underpass (and associated pump station) as well as the Masonic tunnel. The construction of these would likely have disturbed or destroyed any intact historic-era resources, so that the likelihood of encountering new intact, eligible resources is low.
Construction of the Hybrid Alternative would also require sewer relocations near Park Presidio Boulevard at depths of up to 16 feet. These sewer relocations improvements would occur in areas considered to have low potential to encounter either pre-historic or historic-era archaeological resources. Streetscape features, particularly bus shelters and lighting, would require excavation to 16 feet in select locations, but these excavations are limited and located generally within areas of low or no sensitivity to yielding previously unrecorded archaeological resources. Between Palm/Jordan Avenues and 27th Avenue where the alignment would be center running and require the greatest excavation work, the potential to encounter historic era resources is low.

The infilling of the Old Yerba Buena Cove along with previous disturbance along Mission and Market Streets further reduces the potential for intact resources. The retention of the Webster Street pedestrian bridge and retention of two local bus stops at Spruce and Cook Streets reduces excavation work and the potential to encounter buried resources.

An Unanticipated Discovery Plan will be developed, in coordination with your office, for the Undertaking. In the unlikely event that intact archaeological resources are discovered during construction activities, construction will be halted and the discovery area isolated and secured until a qualified archaeologist assess the nature and significance of the find as outlined in the Unanticipated Discovery Plan.

**Determination**

Based on the supplemental information provided in this letter, the analysis in the Draft EIS/EIR, and the information provided in the previous consultations, FTA has determined that the Project would have no adverse effect on archaeological resources. As previously noted in our September 13, 2016 letter, FTA has also determined that the Project would have no adverse effect on built historic resources. Therefore, in accordance with 36 CFR § 800.5, FTA requests your concurrence with a finding of no adverse effect on historic properties for this undertaking.

Thank you for your assistance in this undertaking. If you have any questions or concerns, please contact Alex Smith at (415) 734-9472.

Sincerely,

[Signature]

Leslie T. Rogers
Regional Administrator

cc: Wahid Amiri, SFMTA
December 6, 2016

Reply To: FTA_2015_0423_001

Leslie Rogers  
Regional Administrator  
Federal Transit Administration  
90 Seventh Street, Suite 15-300  
San Francisco, CA 94103-6701

Re: Section 106 Consultation for the Geary Boulevard Bus Rapid Transit (BRT) Project, City and County of San Francisco, CA

Dear Mr. Rogers:

Thank you for the letter received September 15, 2016, continuing consultation for the above-referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. The Federal Transit Administration (FTA) provided additional information in the letter received November 2, 2016. Included with the September 15, 2015, letter were:

- *Historic Resources Inventory and Evaluation Report, Geary Corridor Bus Rapid Transit (BRT) Project, San Francisco, California (HRIER, JRP, August 2015)*
- *Finding of Effect Geary Corridor Bus Rapid Transit (BRT) Project, San Francisco, California (FOE, JRP, August 2015)*

FTA is providing funding to the San Francisco Municipal Transit Agency’s (SFMTA) for the construction and implementation of BRT service along Geary Street and Geary Boulevard. The undertaking would construct and operate BRT service along dedicated lanes within various locations of San Francisco’s Geary corridor, including physical transit infrastructure improvements such as transit signal priority, pavement resurfacing, new and relocated stations, and curb ramp and corner bulb installation. The SFMTA is currently analyzing multiple alternatives; however the Staff-Recommended Alternative is the Hybrid Alternative described in FTA’s letter and is the alternative that will be brought forward for approval, and comprises the undertaking for the purposes of this consultation.

The letter from my office dated May 28, 2015 agreed with FTA’s delineation of the Area of Potential Effect (APE) and the identification efforts to that date. The current submittal requests concurrence on the eligibility of the St. Francis Cooperative as well as a finding of no adverse effect for the undertaking.

On April 17, 2015, FTA submitted to our office an *Archaeological and Native American Cultural Resources Sensitivity Assessment* (Byrd, Kajiankski, and Costello 2014). As
explained in Byrd, Kajjankoski, and Costello 2014, the purpose of the sensitivity assessment was to help project planners anticipate the general types of cultural resources for the area. As an alternative had yet to be chosen, including the placement of the vertical area of direct impact (ADI), the sensitivity analysis was limited to providing a “general assessment of the potential for encountering previous undocumented archaeological sites below the modern urban land surface” (Byrd, Kajjankoski, and Costello 2014: 1).

As indicated in FTA’s November 2, 2016, letter, the result of the sensitivity assessment was successful in identifying areas that have the potential to contain archaeological deposits below the modern urban landscape. However, the November 2 letter only references the Yerba Buena Cove Reclaimed land and the Geary Expressway and Cemetery Area as having a moderate to high sensitivity level for encountering historic-era archaeological deposits. The letter fails to mention that the prehistoric archaeological sensitivity analysis also identified areas that not only have varied potential to contain buried prehistoric archaeological resources, but that considerable areas within the western and eastern portions of the APE were found to have a high potential for buried prehistoric archaeological deposits. Additionally, as stated above, the findings of the sensitivity analysis were limited being that a final alternative had yet to be chosen, in particular the placement of the vertical ADI. As such Byrd, Kajjankoski, and Costello 2014 provided recommendations and a very detailed process for completing identification efforts “once a final alternative is chosen, and the vertical Study Area and the ADI are identified” (56), including specific efforts to be conducted by a historical archaeologist.

After reviewing the information submitted with your letter, I offer the following comments:

- Following the review of Byrd, Kajjankoski, and Costello 2014, the SHPO had “no comments on the identification documents at this time” and further stated that “the identification efforts to date appear adequate” (SHPO to FTA, letter, 28 May 2015). These comments were provided with the expectation that further identification efforts, as described in Byrd, Kajjankoski, and Costello 2014, were to occur once an alternative had been chosen. At this time, the SHPO cannot concur with FTA’s finding of no adverse effect for this undertaking for the following reasons:
  - There is no discussion or analysis for the potential to effect buried prehistoric archaeological deposits within the APE. In particular, potential effects to buried prehistoric archaeological deposits within the western and eastern locations, two locations Byrd, Kajjankoski, and Costello 2014 identified as being highly sensitive for buried prehistoric archaeological deposits;
  - As indicated in Byrd, Kajjankoski, and Costello 2014, it was inconclusive whether or not previous construction had destroyed buried historic-era archaeological deposits within the Yerba Buena Cove Reclaimed land and the Geary Expressway and Cemetery Area. Therefore, it is unclear how FTA has determined that there is very little to no likelihood of encountering intact archaeological resources within areas of the APE determined to have a moderate to high potential for buried historic-era resources; and
It is unclear why the recommendations detailed in Byrd, Kaijankoski, and Costello 2014 on pages 54 through 58 for further identifying the potential for encountering buried prehistoric and historic-era archaeological resources within areas of the APE determined to have a moderate to high level of sensitivity has not occurred.

- The HRIER and FTA’s September 15, 2016, letter identified the St. Francis Cooperative as a historic property eligible for listing on the National Register of Historic Places (NRHP). Table 3 on page 5-7 of the HRIER also lists an additional 21 previously surveyed properties within the APE that had been recommended as eligible for the NRHP, but have not received concurrence. Please clarify whether FTA is requesting concurrence on those recommendations, or assuming them eligible for the purposes of this project. Please also clarify the effect of the undertaking on these properties.

- Table 5 on page 5-9 of the HRIER lists 70 properties recommended as not eligible for listing on the NRHP. Please clarify whether FTA is requesting concurrence on the ineligibility of these properties.

Additionally, as stated in 36 CFR § 800.13(a)(2) it is the agency’s responsibility to include in the FOE a process to resolve any adverse effects on historic properties likely to be discovered during implementation of an undertaking. The identification of subsurface archaeological properties is obviously limited by the urban nature of the APE, and areas of sensitivity were identified in the Archaeological and Native American Cultural Resources Sensitivity Assessment (Byrd, Kaijankoski, and Costello 2014). The unanticipated discovery plan proposed by FTA in the November 2, 2016, letter to address the post-review discovery of subsurface resources needs to be submitted for SHPO review and comment prior to concurrence with a finding of effect.

I look forward to continuing this consultation with you. If you have any questions, please contact Kathleen Forrest of my staff at (916) 445-7022 or e-mail at kathleen.forrest@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer
Ms. Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
California Department of Parks and Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816  
Attention: Kathleen Forrest, State Historian  

Re: Request for Concurrence on Eligibility of a Historic Resource and Finding of No Adverse Effect for Geary Bus Rapid Transit Project, San Francisco, CA (FTA_2015_0423_001)  

Dear Ms. Polanco:  

The Federal Transit Administration (FTA), in cooperation with the San Francisco Municipal Transportation Agency (SFMTA) and San Francisco County Transportation Authority (SFCTA), is continuing consultation with the California State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act (NHPA) for the Geary Bus Rapid Transit (BRT) Project in San Francisco, California. This letter responds to your letter of December 6, 2016 and provides additional information on archaeological resources. In accordance with 36 CFR 800.5, FTA requests your concurrence with the determination of eligibility and determination of no adverse effect to historic properties.  

**Additional Information on the Undertaking**  
The undertaking involves the implementation of BRT improvements along a five-mile segment of Geary between 48th Avenue and Market Street in San Francisco, California. The enclosed Finding of Effect (FOE) report provides an analysis of potential effects of each project alternative to support the Environmental Impact Statement (EIS) prepared pursuant to the National Environmental Policy Act; however, the undertaking is defined as the Hybrid Alternative since it was identified as the locally preferred alternative.  

The Hybrid Alternative extends side-running bus-only lanes between Market Street and Palm Avenue, center-running lanes without passing lanes in a dedicated median from Palm Avenue to 27th Avenue, and side-running lanes from 27th Avenue to 34th Avenue. The refinements to the Hybrid Alternative since publication of the 2015 Draft EIS/EIR include the following:  

- Removal of the proposed Webster Street pedestrian bridge, thus retaining the existing bridge  
- New BRT stops at Spruce/Cook Streets (existing local/express stops retained)  
- Additional pedestrian improvements (primarily pedestrian bulbs) at locations throughout the Geary corridor  
- New BRT stops at Laguna Street
• Retained local stops at Collins Street. (i.e. no changes to local bus stops at Collins)
• Minor shift of the westbound center-running to side-running bus-only lane transition area by one block, from 26th and 27th avenues to the block between 27th and 28th Avenues.

As noted in our previous letter, the refinements occur within the area of potential (APE). FTA and SHPO agreed on the delineation of the APE in May 2015. As shown on Table 2 of the FOE, the archeological APE includes a depth of 1 to 3 feet below surface within the roadway or sidewalk of Geary, which encompasses the depth of ground disturbance due to construction and utility relocation. The exceptions are locations of street lights and other signal poles (16 feet), sewer replacement between 12th and 16th Avenues on Geary (16 feet), and catch basin inlet and hydrant relocations (8 feet). Additional detail on the Hybrid Alternative and these refinements may be found in Section 1.4 of the FOE.

Determination of Eligibility
In accordance with 36 CFR § 800.4, FTA is requesting your concurrence on the following determinations of eligibility for the National Register of Historic Places (NRHP). As stated in our letter of September 15, 2016, FTA determined that the St. Francis Cooperative is a historic property eligible for listing on the NRHP under Criteria A and C as part of this study. Twenty-one (21) properties, shown on Table 3 of the enclosed Final Historic Resources Inventory and Evaluation Report (HRIER), were previously surveyed and recommended as eligible; however, no previous consultation with your office was conducted for these properties. Therefore, FTA is also requesting concurrence that these 21 properties are eligible for the NRHP. Table 5 of the HRIER lists 69 properties that were found to be ineligible for the NRHP. Appendix B of the HRIER includes the associated State of California Department of Parks and Recreation (DPR) 523 Forms.

Supplemental Archaeological Resources Identification Efforts
In the letter dated December 6, 2016, SHPO found that it could not concur with FTA’s finding of no adverse effect because additional details to elaborate on the specific sensitivity of the Geary corridor for archaeological resources had not been provided. SHPO recommended that the recommendations in the Archaeological and Native American Cultural Resources Sensitivity Assessment (2014 Sensitivity Assessment) be followed. The 2014 Sensitivity Assessment identified two areas of elevated sensitivity in the eastern end of the project along Market Street within the historic-era margin of Yerba Buena Cove and the western portion of the project between Masonic and Gough Streets. These recommendations included more detailed historic archival study of the chosen alternative and of buried site sensitivity for both historic-era and prehistoric resources within the project area.

In response to those recommendations, the enclosed Addendum to the Archaeological Resources Sensitivity Assessment, Research Design, and Treatment Plan (2017 Addendum) for the Geary Corridor Bus Rapid Transit Project was prepared. The 2017 Addendum re-assessed site sensitivity based on revised modeling of sub-surface soils and additional archival study. This study updates the earlier one with new information on the age of the soils and the locations of historic-era fresh water sources and dune fields in the northern San Francisco Peninsula. Although the prehistoric sensitivity has moderate or low potential throughout the entire project area, an analysis of the cut-and-fill history of the Geary Corridor was conducted to further rule out areas where prehistoric deposits may have been found but are unlikely to be encountered by the project.
Sensitivity assessments for sub-surface prehistoric archaeological sites identified areas of moderate, low, and very low sensitivity for prehistoric archaeological resources for most the corridor. On the Market Street portion in the eastern edge of the corridor, the project is within areas of low or moderate sensitivity for buried prehistoric resources. The project area along Market Street is within the historic-era margin of Yerba Buena Cove. Therefore, although the project area has lowest sensitivity for surface or buried archaeological sites, the project area has a high potential for sites submerged beneath Bay Mud as the bay expanded during the Middle and Late Holocene. Sites submerged below the Bay Mud have been found at depths greater than 20 feet. Since project excavations would occur at depths of up to 16 feet, project excavations in this area would not be sufficiently deep to encounter buried prehistoric resources. (See 2017 Addendum Section 2 for additional information on the research conducted for archeological sensitivity).

The Geary corridor between Masonic Avenue and Gough Street was characterized with moderate sensitivity for historic-era archaeological resources in the 2014 Sensitivity Assessment. Historic-era archaeological sensitivity analysis indicated the potential to disturb elements of urban infrastructure and potential historic-era graves, occupational debris, and other features along the Geary Expressway and Cemetery Area between Masonic and Gough Streets. A systematic review of project design plans was undertaken to evaluate the potential to encounter such remains during construction. As shown on Table 5 of the 2017 Addendum, the sensitivity for encountering these resources was reduced to low since areas were either within areas disturbed during the original construction of Geary Street or project elements will be built within footprints previously disturbed by modern infrastructure associated with Geary Street and the public right-of-way.

**Effects evaluation**

No archaeological sites have been recorded within the APE. No known sites will be affected by the project. However, five historic-era sites have been previously recorded adjacent to the archaeological APE. These five sites are historic-era resources that were identified well below the street surface and they do not appear that they extend into the archaeological vertical APE. In the unlikely event that archaeological deposits are encountered, a late discovery treatment plan was developed to address any inadvertent late discoveries during project implementation. (See Section 3.2 of the FOE).

Project components of the Hybrid Alternative, such as transit signal priority (TSP), traffic signal upgrades or replacement, medians, pedestrian countdown signals, accessible pedestrian signals, curb ramps, corner bulbs (curb extensions), the bicycle path, and mixed-flow traffic lanes and parallel parking, are considered minor project elements. These features occur primarily within the active transportation corridor and within footprints previously disturbed by modern infrastructure, and are consistent with the existing urban landscape, they have no potential to adversely affect historic properties, either directly or indirectly. The only project components that may have potential effects on historic properties are the BRT lanes and stations/stops; however, no direct impacts on historic properties are anticipated, including the underground pipes or other contributing features of the Auxiliary Water Supply System (AWSS). If during refinement of project design, it is determined that pipes will be directly impacted, the relocation and use of in-kind materials at these locations would be consistent with the Secretary of Interior (SOI) Standards and conducted in consultation with your office. The AWSS system would retain its overall integrity of location, design, setting, materials, workmanship, feeling, and association. In general, utility relocations would be done in advance of construction and would be done in coordination with the appropriate utility provider.
The Hybrid Alternative is adjacent to fourteen of the Golden Triangle Light Standards historic property, but all proposed stations/stops would be designed to avoid removal, relocation or damage to these historic structures. The Hybrid Alternative would also include the construction of a new westbound local stop at the intersections of Geary and Webster Streets and Geary and Buchanan Streets, respectively, that would be near or adjacent to as many as eight light standards that contribute to the Japan Center. Like the Golden Triangle Light Standards, the light standards associated with Japan Center would be designed to avoid removal, relocation or damage to the eight contributing Japan Center light standards. If during further design refinement a light standard cannot be avoided, the light standard will be relocated to another location within the historic property boundary of either the Golden Triangle Light Standard or Japan Center. While the relocation of any light standards would be a direct effect to these historic properties, it would not be adverse. These historic properties would retain overall integrity of setting, feeling, and association. All effort will be made first for relocation of light standards within the immediate vicinity of their original location while maintaining placement (distance) of the standard within the sidewalk in respect to curb and/or adjacent buildings; second, relocation within the same block if there is a site where the original light standard has been removed or replaced by modern standards; and last, relocation to an available site within the historic property boundary where an original standard has been removed or replaced by modern standards.

The Hybrid Alternative would not cause indirect adverse effects to the 53 historic properties identified along the corridor or associated historic district from operational or construction noise (36 CFR 800.5[a][2][v]) because none of these historic properties have an inherent quiet quality that is part of a property’s historic character and significance. Similarly, there would be no indirect adverse effects from operational vibration as the BRT buses would have rubber tires and suspension systems that isolate vibrations from the ground.

Section 106 Determination
Based on the provided information with this letter, the supplemental reports transmitted herein, and the information provided previously, FTA has determined that the Project would have no adverse effect on built environment resources or archaeological resources. In accordance with 36 CFR 800.5, FTA requests your concurrence with a finding of no adverse effect on historic properties for this undertaking.

Section 4(f) Notification
Per 23 CFR Section 774.5(b), FTA is notifying you of our intent to make a de minimis impact determination under Section 4(f) of the Department of Transportation Act of 1966 for three historic resources, namely the Auxiliary Water Supply System, the Golden Triangle Light Standards, and light standards associated with Japan Center. FTA’s de minimis impact determination is contingent upon your concurrence with the Section 106 finding of no adverse effect to historic properties.
Thank you for your assistance in this undertaking. If you have any questions or concerns, please contact Alex Smith, Community Planner, at (415) 734-9472.

Sincerely,

Leslie T. Rogers
Regional Administrator

Enclosures:

3. Finding of Effect (FOE) (July 2017)
October 17, 2017

Reply To: FTA_2015_0423_001

Leslie Rogers
Regional Administrator
Federal Transit Administration
90 Seventh Street, Suite 15-300
San Francisco, CA 94103-6701

Re: Geary Boulevard Bus Rapid Transit (BRT) Project, City and County of San Francisco, CA

Dear Mr. Rogers:

Thank you for the letter received September 18, 2017, continuing consultation with the State Historic Preservation Officer (SHPO) for the above-referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR § 800. The Federal Transit Administration (FTA) provided the following documents:

- **Historic Resources Inventory and Evaluation Report, Geary Corridor Bus Rapid Transit (BRT) Project, San Francisco, California** (HRIER, JRP Historical Resources Consulting, LLC, April 2017)
- **Finding of Effect Geary Corridor Bus Rapid Transit (BRT) Project, San Francisco, California** (FOE, JRP Historical Resources Consulting, LLC and Far Western Anthropological Research Group, July 2017)

FTA is providing funding to the San Francisco Municipal Transit Agency's (SFMTA) for the construction and implementation of BRT service along Geary Street and Geary Boulevard. SFMTA has chosen the Hybrid Alternative as the locally preferred alternative, which extends side-running bus-only lanes between Market Street and Palm Avenue, center-running lanes without passing lanes in a dedicated median from Palm Avenue to 27th Avenue, and side-running lanes from 27th Avenue to 34th Avenue.

The letter from my office dated May 28, 2015 agreed with FTA's delineation of the Area of Potential Effect (APE) and the identification efforts to that date. The current submittal
responds to the SHPO’s comments of December 6, 2016, and requests concurrence with the identification efforts and finding of effect.

FTA has provided additional information regarding the archaeological sensitivity of the Geary corridor. The 2017 Addendum re-assessed site sensitivity based on revised modeling of sub-surface soils and additional archival study. The sensitivity assessments for sub-surface prehistoric archaeological sites identified areas of moderate, low, and very low sensitivity. No new archaeological sites were recorded within the APE and no known sites will be affected by the undertaking. Five-historic era sites have been previously recorded within the APE, but are located well below street surface and do not appear to extend into the vertical APE. A late discovery treatment plan was developed to address any inadvertent discoveries during project implementation.

FTA has identified the St. Francis Square Cooperative as eligible for listing in the National Register of Historic Places (NRHP) within the APE. Twenty-one properties were previously surveyed and recommended as eligible, but were not submitted to the SHPO for concurrence. FTA has determined that these properties, shown in the table below, are also eligible for listing in the NRHP:

Properties that appear to be eligible for listing in the NRHP:

<table>
<thead>
<tr>
<th>Map Reference No.</th>
<th>Block/Lot No.</th>
<th>Address</th>
<th>Year Built</th>
<th>Status Code</th>
<th>Resource Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>05-15</td>
<td>n/a</td>
<td>n/a</td>
<td>1908-1964</td>
<td>3S</td>
<td>Auxiliary Water Supply System</td>
</tr>
<tr>
<td>06-03</td>
<td>1433 009</td>
<td>3700 Geary Blvd.</td>
<td>1893</td>
<td>3S</td>
<td>Park &amp; Ocean Railroad Company, Geary St. Car Barn.</td>
</tr>
<tr>
<td>09-01</td>
<td>0709 027</td>
<td>1510 O’Farrell St.</td>
<td>1962-63</td>
<td>3S</td>
<td>St. Francis Square Cooperative</td>
</tr>
<tr>
<td>09-02</td>
<td>0700 022, 0700 023, 0700 027, 0700 028, 0700 029</td>
<td>1610 Geary Blvd.</td>
<td>1965-68</td>
<td>3S</td>
<td>Japan Center</td>
</tr>
<tr>
<td>09-03</td>
<td>0711 012, 0711 013, 0711 021</td>
<td>1450 Laguna St.</td>
<td>1936, 1955, 1963</td>
<td>3S, 6Z</td>
<td>San Francisco Japanese Salvation Army</td>
</tr>
<tr>
<td>10-04</td>
<td>0303 003</td>
<td>601 Leavenworth St.</td>
<td>1924</td>
<td>3D</td>
<td>Casa Feliz Apartments</td>
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<tr>
<td>11-01</td>
<td>n/a</td>
<td>Geary Blvd./O’Farrell St.</td>
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<td>3S</td>
<td>Golden Triangle Light Standards</td>
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<td>11-02</td>
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<td>301-345 Powell St.</td>
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<td>St. Francis Hotel</td>
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<td>235-243 O’Farrell St.</td>
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<tr>
<td>11-04</td>
<td>0326 001</td>
<td>201-219 O’Farrell St.</td>
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<td>3S</td>
<td>Marquardt’s Little Cigar Store</td>
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<td>Whittell Building</td>
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<td>3S</td>
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<tr>
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</tr>
<tr>
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<td>3S</td>
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<td>3S</td>
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<td>3S</td>
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</tr>
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<td>3S</td>
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<td>Address</td>
<td>Year Built</td>
<td>Status Code</td>
<td>Resource Name</td>
</tr>
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<td>11-16</td>
<td>0310 005</td>
<td>10-12 Geary St.</td>
<td>1907, 1908</td>
<td>3S</td>
<td>Schmidt Building</td>
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<td>Fidelity Savings</td>
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<tr>
<td>11-18</td>
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<td>66 Geary St.</td>
<td>1906</td>
<td>3S</td>
<td>Hotel Greystone</td>
</tr>
</tbody>
</table>

FTA has also identified 69 properties that have been determined to be ineligible for the NRHP, listed in the table below:

Properties that do not appear eligible for listing in the NRHP and do not appear to be historical resources for the purposes of CEQA.

<table>
<thead>
<tr>
<th>Map Reference No.</th>
<th>Block/Lot No.</th>
<th>Address</th>
<th>Year Built</th>
<th>Status Code</th>
</tr>
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<td>6Z</td>
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<td>05-09</td>
<td>1437 020</td>
<td>4134 Geary Blvd.</td>
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FTA has found that the undertaking will result in no adverse effect to historic properties. After reviewing the information submitted with your letter, I offer the following comments:

- I agree that the 22 properties shown in the table above are eligible for listing in the NRHP, per 36 CFR § 800.4(c)(2).
- I agree that the 69 properties shown in the second table above are ineligible for listing in the NRHP, per 36 CFR § 800.4(c)(2).
- I agree that the undertaking as described in the consultation package will have no adverse effects to historic properties, per 36 CFR 36 CFR § 800.5(b).
- Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description or method of implementation, the FTA may have future responsibilities for this undertaking under 36 CFR § 800.

If you have any questions, please contact Kathleen Forrest of my staff at (916) 445-7022 or Kathleen.Forrest@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer
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