Edward D. Reiskin  
Director of Transportation  
San Francisco Municipal Transportation Agency  
1 South Van Ness Avenue, 7th Floor  
San Francisco, CA 94103

Re: Geary BRT Project Environmental Re-evaluation

Dear Mr. Reiskin:

The Geary BRT Project (Project) was previously the subject of a Record of Decision dated June 1, 2018. After review of the San Francisco Municipal Transportation Agency’s (SFMTA) letter and supporting materials, dated September 24, 2018, the Federal Transit Administration (FTA) determines that neither the preparation of a Supplemental Environmental Impact Statement (SEIS) nor an Environmental Assessment (EA) is necessary, in accordance with 23 CFR §§ 771.115, 771.119, and 771.130(c), for a design change for the Project.

Based on the information submitted and past experience with similar projects, this review finds that the design changes: do not induce significant environmental impacts to planned growth or land use for the area; do not require the relocation of significant numbers of people; do not have a significant impact on natural, cultural, recreational, historical or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; do not result in a use or constructive use of historic or other resources within the meaning of Section 4(f) of the Department of Transportation Act, 49 USC § 303; or do not otherwise, either individually or cumulatively, have any significant environmental impacts.

The FTA finds that the changes described in the re-evaluation materials are not substantial and with the mitigation specified in the re-evaluation material the changes will not cause significant environmental impacts that were not previously evaluated. Neither the preparation of a SEIS nor an EA is necessary.

If you have any questions, please contact Alexander Smith at (415) 734-9472 or by email at alexander.smith@dot.gov.

Sincerely,

[Signature]

Edward Carranza, Jr.  
 Acting Regional Administrator
September 24, 2018

Edward Carranza, Jr.
Acting Regional Administrator
Federal Transit Administration, Region IX
90 7th Street
San Francisco, CA 94105

Subject: Submittal of Checklist for Geary Bus Rapid Transit Re-Evaluation

Dear Mr. Carranza:

On behalf of the San Francisco Municipal Transportation Agency (SFMTA) and the San Francisco County Transportation Authority (SFCTA), we are pleased to submit the attached checklist for re-evaluation of proposed changes to the Geary Bus Rapid Transit Project per 23 CFR §771.129-130.

Since completion of the Final Environmental Impact Statement and Record of Decision, the design of the project has been refined as a result of public outreach and feedback as well as advancement of design for Phase I of the project, which includes improvements between Market and Stanyan streets. Per direction from Alex Smith, we have prepared the attached analysis which shows that the project changes would not cause new significant impacts not identified in the FEIS, nor increase the severity of previously identified significant effects. The analysis also shows that no new information or circumstances relevant to environmental concerns exist that could cause new significant effects. Therefore, we believe that the previous EIS/ROD remains valid, and that no subsequent or supplemental EIS, supplemental Environmental Assessment, or other supplemental environmental document is required.

This document has also been reviewed by the San Francisco Office of the City Attorney. We believe this document is legally sufficient for National Environmental Policy Act purposes. Audrey Pearson is the legal counsel contact, and she can be reached at Audrey.Pearson@sfcityatty.org or (415) 554-4621.

If you need any additional information, please contact Liz Brisson 415.701.4791 or liz.brisson@sfmta.com. We look forward to your comments on or your concurrence with the checklist.

Sincerely,

Edward D. Reiskin
Director of Transportation
Introduction
Since certification of the combined Environmental Impact Statement and Record of Decision (EIS/ROD) in June 2018, the design of the Geary Bus Rapid Transit (Geary BRT project) has advanced as a result of public outreach, feedback, and the detailed design for Phase I of the project. Project changes include modifications to certain bus stops, intersections, parking, and pedestrian facilities within the Phase I segment of the corridor. As demonstrated below, the project changes would not result in new or more severe environmental effects.

Pursuant to 40 CFR 1508.4, the following checklist has been prepared. This checklist incorporates by reference the Geary BRT FEIS and all technical studies and memoranda prepared for the FEIS, and incorporates by reference the Geary Project Refinements Transportation Analysis Technical Memorandum prepared for the project changes by San Francisco Municipal Transportation Agency (SFMTA) dated August 8, 2018.

A. DETAILED PROJECT DESCRIPTION:
- Include project features and identify project sponsor.
- Include funding source (e.g. CMAQ, formula funds, discretionary funds, etc.)

Approved Project
The San Francisco County Transportation Authority (SFCTA), in cooperation with the Federal Transit Administration (FTA) and SFMTA, proposes to implement physical improvements and modified bus service (BRT) along the 6.5 miles of the Geary Corridor. The Geary BRT project will implement physical roadway and lane changes between Market Street and 34th Avenue, and will also implement bus service amenities and improvements between the Transbay Transit Center and 48th Avenue. The Hybrid Alternative was selected as the Locally Approved Alternative (LPA) and was approved by SFCTA in January 2017 and by SFMTA in July 2017. FTA, SFCTA, and SFMTA issued a combined FEIS/ROD on June 15, 2018.

Bus-only lanes, currently installed on most of Geary and O’Farrell streets between Market and Gough streets, enhance transit service by separating bus traffic from regular (mixed-flow) traffic. Extending these bus-only lanes west of Gough Street will reduce bus delays and improve reliability. In addition, the project includes numerous transit and pedestrian supportive elements, including but not limited to bus and pedestrian bulbouts to help expedite bus loading and improve safety, traffic signal upgrades, upgraded station amenities, and resurfacing of mixed-flow traffic lanes. Implementation of the project has been divided into two primary construction phases:
- Phase I will generally entail work east of Stanyan Street where BRT will operate in side-running bus-only lanes.
- Phase II will include work west of Stanyan Street, where BRT operations will be in predominantly center-running bus-only lanes.

Project Funding Information
The Hybrid Alternative/LPA is estimated to cost $300 million. This estimate includes both the capital cost of the project’s core components and parallel improvements. Budgeted and planned funding sources for Phase I and Phase II of the project have not changed since publication of the Final EIS/ROD; see details in Table 1 and Table 2 below. Full details on project funding can be found in Chapter 9 of the FEIS.
Table 1 Budgeted/Planned Funding Sources for Geary BRT Phase I

<table>
<thead>
<tr>
<th>PROPOSED FUNDING SOURCE</th>
<th>PROPOSED (UP TO) AMOUNT (SM)</th>
<th>PROPOSED YEAR AVAILABLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>FEDERAL/STATE FUNDS</td>
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</tr>
<tr>
<td>Transit Performance Initiative-Investment</td>
<td>$9.6</td>
<td>FY 2017-2020</td>
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<td>One Bay Grant</td>
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<td>LOCAL FUNDS</td>
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<td></td>
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<tr>
<td>Prop K Transportation Sales Tax</td>
<td>$3.4</td>
<td>FY 2011-2020</td>
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<tr>
<td>Local General Obligation &amp; SFMTA Revenue Bond</td>
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<td>FY 2015-2020</td>
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<tr>
<td>Prop AA Vehicles Registration Fee</td>
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<tr>
<td>General Fund</td>
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<td>SF PUC Contribution</td>
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<td>TOTAL</td>
<td>$65 M ¹</td>
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</table>

¹ Amount is rounded.

Table 2 Planned and Potential Geary Funding Sources for BRT Phase II

<table>
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<tr>
<th>PROPOSED FUNDING SOURCE</th>
<th>PROPOSED (UP TO) AMOUNT (SM)</th>
<th>PROPOSED YEAR AVAILABLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>FEDERAL/STATE FUNDS</td>
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<td>FTA Small Starts</td>
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<td>TPI – Investment</td>
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<td>FY 2018-2027</td>
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<tr>
<td>OBAG Program (Federal STP/CMAQ Program funds)</td>
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<td>Lifeline Transportation Program</td>
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<td>STATE FUNDS</td>
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<td></td>
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<tr>
<td>Cap and Trade</td>
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<tr>
<td>LOCAL FUNDS</td>
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<td>Prop K Sales Tax</td>
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<td>FY 2011-2020</td>
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<td>Prop AA</td>
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<td>New Local Revenue Measure</td>
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<td>FY 2018-2020</td>
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<td>Cost sharing opportunities (e.g., Public Utilities Commission, San Francisco Public Works, other for utilities, paving, etc.)</td>
<td>$11</td>
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<tr>
<td>Other Developer Contributions</td>
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<td>TSF</td>
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<tr>
<td>TOTAL</td>
<td>$239 M ¹</td>
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¹ The potential funding amounts add up to more than the Phase 2 project cost ($235 million).

Changes to Existing Conditions
Since approval of the FEIS/ROD in June 2018, there have been no substantial changes to the circumstances under which the project will be implemented. The Geary corridor is generally the same as described in the FEIS, with regard to both physical attributes and traffic and transit operations.
Traffic counts along the corridor were originally collected between 2010 and 2012. In order to confirm that traffic conditions had not changed significantly since 2012, additional traffic counts were completed in May 2015. These counts were conducted at locations where previous traffic counts had been done in 2010 and/or 2012. Peak hour traffic volumes observed in May 2015 were determined to range from 5 to 25 percent lower than in the 2010 and 2012 counts. Additionally, in 2017, the project team analyzed 2016 traffic counts to further confirm traffic conditions had not substantially changed in the corridor, and found that the 2016 counts further supported the 2015 counts in a general trend towards reduced peak hour traffic along the corridor. Additionally, since approval of the Geary BRT project, transit service has remained generally the same along the corridor with no significant changes to bus service, bus stop locations, or headways.

Similarly, since FTA issued the FEIS/ROD for the Geary BRT project, SFCTA is not aware of any new information of substantial importance that would show that the project would have an adverse effect not discussed in the FEIS; that previously examined effects would be substantially more severe; or that avoidance, minimization, or mitigation measures that were found infeasible are now in fact feasible.

Project Changes
Since the issue of the FEIS/ROD by FTA, the design of the project has advanced as a result of public outreach and feedback as well as from preparation of a detailed design for Phase I of the project. Phase I includes improvements between Market and Stanyan streets. This additional design work has resulted in changes to certain bus stops locations, intersections, parking, and pedestrian facilities within the Phase I segment of the corridor. Outreach activities during the design phase have included public open houses; a merchant loading survey; a bus stop change survey; and general mailings, postings, community meetings and presentations. This document describes the changes in the project and evaluates the potential for these changes to result in new or more severe effects to the environment. Project changes are described below.

Geary/Masonic Outbound Stop Sidewalk Widening
The Hybrid Alternative/LPA design at the outbound Masonic Avenue bus stop provided only the existing sidewalk footprint for bus stop amenities, such as a bus shelter. The revised design extends the existing sidewalk at the Geary/Masonic outbound bus stop to the north into an adjacent SFMTA-owned public parking lot to create additional space to relocate the bus shelter. The sidewalk expansion would be approximately 7 feet wide (into the parking lot) and 17 feet long (parallel to the roadway). The bus shelter would be relocated north from the location proposed in the FEIS to a location within the expanded sidewalk. This expansion provides more space for pedestrians to walk and to wait for the bus. This change is shown in Figure 1.

![Figure 1](source: SFCTA, 2018)
Bus Stop Length and Design Modifications
The Hybrid Alternative/LPA included bus stops long enough for three 60-foot articulated buses at most of the stops served by both BRT and local service. At some of these stops, the Hybrid Alternative/LPA also anticipated separate places for the local and BRT services to stop within one bus stop area. Figure 2 shows these typical configurations in the top row (labeled ‘LPA’). The individual bus stop designs analyzed in the FEIS can be found in Appendix A of the FEIS. SFMTA proposes to shorten each stop served by BRT and local buses to accommodate two buses instead of three buses. At stops where separate places were previously proposed for BRT and local buses to stop, SFMTA proposes to consolidate the stops for the local and BRT bus services at a single point. Figure 2 depicts both of these types of changes. These changes are proposed to improve transit performance and passenger experience as further described in the analysis below.

These changes are proposed at the following locations:

**Outbound stops, from east to west**
- Geary/Kearny Outbound (shorten)
- Geary/Stockton Outbound (consolidate)
- Geary/Powell Outbound (consolidate)
- Geary/Leavenworth Outbound (consolidate)
- Geary/Van Ness Outbound (consolidate)
- Fillmore Outbound (shorten)
- Divisadero Outbound (shorten)
- Masonic Outbound (shorten)

**Inbound stops, from east to west**
- O’Farrell/Grant Inbound (shorten)
- O’Farrell/Powell Inbound (shorten)
- O’Farrell/Van Ness Inbound (consolidate)
- Fillmore Inbound (shorten)
- Divisadero Inbound (shorten)
- Masonic Inbound (shorten)

In areas where the length of the bus stop is shortened, a shorter bus bulb would be constructed. Since the precise length of each bus stop as proposed in the FEIS under the Hybrid Alternative/LPA varies, the reduction necessary to achieve a length of approximately 120 feet (sufficient to accommodate two buses) also varies by stop but is generally between 20 and 60 feet. In some cases, bus stop shortening preserves additional parking and loading as described below. The type of bus stop described in the FEIS would remain unchanged (i.e. Shelter Plus or Signature).

Figure 2  Representative Examples of Bus Stop Shortening (left) and BRT/ Local Stop Consolidation (right)
O’Farrell Street between Leavenworth and Taylor Streets: Changes to Bus Stop Locations

**O’Farrell Street between Jones and Taylor streets Inbound Stop**
Under the Hybrid Alternative/LPA, the existing mid-block bus stop and associated bus bulb on O’Farrell Street between Jones and Taylor streets that serve local and Rapid buses were proposed to be removed and replaced with a local stop on the near side of the O’Farrell/Taylor intersection. Outreach to adjacent merchants indicated the proposed new location would conflict with commercial loading needs, and could result in blocking of the bus zone which could negatively affect transit performance. In addition, the existing mid-block location is very close to the San Francisco Senior Center and convenient for seniors wishing to access the facility by bus. For these reasons, SFMTA proposes to retain the existing mid-block bus stop location and extend the existing mid-block bus bulb by about 20 feet to the east towards Taylor Street to better allow two buses to load at the same time.

In the immediate vicinity of this bus bulb extension there are a total of four passenger loading spaces and three commercial loading spaces. This revised design would remove one existing commercial loading space, but retain all other existing parking spaces on the block. In conducting outreach to adjacent properties, it was determined that the properties’ loading needs would still be adequately accommodated with this minor reduction in loading zone spaces.

**O’Farrell/Leavenworth Inbound Stop**
As described in the FEIS, the Hybrid Alternative/LPA included construction of a new bus bulb on the far side of the O’Farrell/Leavenworth intersection and conversion of the existing local bus stop into a local and BRT stop. This bus stop change was envisioned to work in parallel with the Jones-Taylor Inbound Stop modification described above to provide more evenly spaced BRT stops; however because the Jones-Taylor Inbound Stop change is no longer a part of the design, the changes at O’Farrell/Leavenworth described in the FEIS are no longer appropriate. Therefore, SFMTA proposes to retain the existing conditions at the O’Farrell/Leavenworth bus stop and preserve the existing local stop. Construction of a bus bulb would no longer occur at this intersection.

This change would allow the retention of all existing parking spaces and loading zones on the block.

**O’Farrell/Larkin: Extend Southwest Corner Pedestrian Bulb into Larkin**
As described in the FEIS, the Hybrid Alternative/LPA proposed a pedestrian bulb on the southwest corner of O’Farrell/Larkin that will extend into O’Farrell Street. SFMTA now proposes to expand the pedestrian bulb to also extend about 6 feet into Larkin Street in order to locate the curb ramp to avoid a sub-sidewalk basement located at this corner as well as to shorten the crossing distance for pedestrians. The bulb would be approximately 20 feet in length south of O’Farrell Street. This change would not remove any parking or loading spaces.

**Geary from Polk Street to Van Ness Avenue: Convert Existing Lane into Shared Left Turn/Through Lane**
As described in the FEIS, the Hybrid Alternative/LPA included the following configuration on Geary Street for the westbound approach to Van Ness Avenue: one peak-hour tow-away left turn lane, two mixed-flow through lanes, one bus-only lane, and one right turn lane, for a total of five lanes (Figure 3). The existing street configuration has four traffic lanes; accommodating five traffic lanes would have required narrow traffic lanes or narrowing of the existing sidewalk.

SFMTA proposes to maintain the existing roadway and sidewalk widths and restrripe the existing four outbound lanes to provide the following configuration: one peak-hour tow-away shared left turn/through lane, one general mixed-flow through lane, one bus-only lane, and one right-turn lane, for a total of four lanes. This configuration would match the lane configurations on the blocks immediately east and west of this block.

This change would result in the loss of six parking spaces to provide more capacity for westbound left-turn movements outside of the peak-hour tow-away time periods. The change to the street configuration for Geary Street between Polk Street and Van Ness Avenue is shown in Figure 3.
Geary Boulevard between Franklin and Gough Streets: Additional Parking Spaces
As described in the FEIS, the Hybrid Alternative/LPA retained the existing no-parking zone on the south side of Geary Boulevard at the westbound approach to Gough Street.

Due to requests from the public for additional on-street parking in this area, SFMTA proposes to rescind the existing no-parking zone and install additional parking spaces in its place. This change would result in five additional parking spaces available along the Geary corridor.

Geary/Gough Intersection: Additional Pedestrian Bulbs
The FEIS did not include pedestrian improvements to the intersection of Geary/Gough. However, to further improve pedestrian safety, the revised design would construct new pedestrian crossing bulbs on the southwest and southeast corners into Gough Street. The bulbs would each be approximately 20 feet in length and 6 feet wide. One parking space would be removed at the southeast corner on Gough Street to accommodate the bulb on that corner.

Geary/Laguna Stops: Construct Bus Bulbs in lieu of Transit Islands
As described in the FEIS, the Hybrid Alternative/LPA will reduce the number of inbound and outbound through lanes for mixed-flow traffic from four to two at Geary and Laguna, while adding a bus lane in each direction. In addition, the Geary BRT project design included operation of transit islands for BRT service at inbound and outbound bus stops at Geary/Laguna. The islands will separate buses from right-turning traffic; right-turning vehicles will use a right-turn only lane between the transit boarding islands and the adjacent sidewalk. However, due to the limited roadway width, trucks will not have enough room to turn right from Geary onto Laguna from the right-turn lane, necessitating a truck restriction on Laguna Street, similar to the restriction on trucks on Laguna south of Geary.

SFMTA now proposes to construct bus bulbs in place of transit islands along both the inbound and outbound approaches. The bus bulbs would be approximately 20 feet wide by 130 feet long, and create additional sidewalk space compared to the Hybrid Alternative/LPA.

Construction of bus bulbs in place of transit islands would result in a shared right-turn and bus-only lane at each bulb. This change would afford larger trucks the opportunity to make legal right-turns onto Laguna Street. In addition, this change responds to stakeholder input expressing a preference for bulbs instead of islands. The changes at the Geary/Laguna stops are shown in Figure 4.
Constructing bus bulbs and not transit islands would require the removal of five existing parking spaces where the sidewalk would be extended. However, the bus bulbs would preserve seven parking spaces previously assumed to be removed along Geary at the northeast and southwest approaches necessary to accommodate boarding islands, as shown in Figure 4.

**Geary/Webster: Restrict Westbound U-Turns**

The Hybrid Alternative/LPA allowed drivers to make U-turns from the westbound approach on Geary Boulevard at Webster Street. U-turns at this intersection are permitted under existing conditions, and are made from the same lane as left turns.

SFMTA proposes to restrict U-turns at this location, requiring additional signage on-site to regulate traffic. This change would allow pedestrians to cross the southern half of the crosswalk while westbound traffic has a green signal for left hand turns. The Geary/Webster U-turn restriction is shown in Figure 5.

This change would not result in changes to parking and loading conditions.
Geary Boulevard between Webster and Fillmore Streets: Sidewalk Width Reduction and New Loading Zones

As described in the FEIS, along westbound Geary Boulevard between Webster and Fillmore streets the Hybrid Alternative/LPA included removal of the existing parking and loading lane to provide one mixed-flow through lane and one shared right turn/bus-only lane. The existing sidewalk at this location on the north side of the street ranges between 10-feet to over 20-feet wide due to an adjacent plaza which extends the usable sidewalk width.

SFMTA now proposes to narrow the sidewalk at this location in order to construct a commercial and a passenger loading zone to accommodate the needs of adjacent businesses. The sidewalk between the curb and the property line would remain 6-feet wide, which is sufficient for accessible pedestrian use, for a length of 76 feet, while the effective useable sidewalk width would remain 16-feet wide between the curb and the building due to the adjacent plaza.

The change would add two loading spaces, one for commercial loading and one for passenger loading.

Geary/Fillmore and Geary/Steiner Intersections: Retain Existing Turning Movements

The Hybrid Alternative/LPA will alter existing traffic patterns by restricting eastbound and westbound left turns at the Geary/Fillmore intersection. The Hybrid Alternative/LPA also included installation of a new eastbound left turn lane and reconfiguration of the median at the Geary/Steiner intersection. The allowed turning movements in the Hybrid Alternative/LPA are shown in Figure 6.

SFMTA proposes to maintain the existing eastbound and westbound left turns at the Geary/Fillmore intersection, and continue restricting left turns in the eastbound direction at the Geary/Steiner intersection.

To restrict eastbound left turns at Geary/Steiner, the center median pedestrian refuge island in the west side crosswalk would be expanded. The median refuge island would be widened by about 10 feet compared to the Hybrid Alternative/LPA, as shown in Figure 7.
Maintaining left-turns at Fillmore Street was determined to be desirable for maintaining access to this neighborhood commercial street. Retaining the eastbound left-turn restriction at Steiner Street was determined to be beneficial because it would lengthen the available green time for pedestrians in the north-side crosswalk and vehicles and buses in the westbound direction while improving the pedestrian crossing on the west side of the intersection. It would also minimize the amount of vehicle traffic on Steiner Street, which is a designated bicycle route.

Similar to the Hybrid Alternative/LPA, this change would not require substantial changes to the existing signal timing at Geary Boulevard and Fillmore Street. Additionally, the change would not result in any change in parking or loading conditions compared to the Hybrid Alternative/LPA.

Figure 6  Hybrid Alternative/LPA Turning Movements

![Figure 6](source: SFCTA, 2018)

Figure 7  Geary/Steiner Intersection

![Figure 7](source: SFCTA, 2018)
Geary/Commonwealth/Beaumont Intersection: Additional Pedestrian Bulbs
The FEIS did not include pedestrian improvements to the intersection of Geary/Beaumont/Commonwealth. However, to further improve pedestrian safety, the revised design would construct new pedestrian crossing bulbs on the northeast corner (at Commonwealth Avenue) and the southwest corner (at Beaumont Avenue). The bulbs would be approximately 20 feet in length and 6 feet wide. No parking spaces would be removed to accommodate these bulbs.

Summary of Project Changes
The project changes include minor design refinements to bus stop details, such as adjustments to the length and location of bus stops; additional pedestrian improvements; and refinements to traffic operations. Given the small scale of the design refinements, these changes would not substantially alter the project description or the overall project goals of providing improved transit service (BRT) and safer traffic conditions along the Geary corridor as described and analyzed in the FEIS.

B. LOCATION (INCLUDING ADDRESS): Attach a site map or diagram, which identifies the land uses and resources on the site and the adjacent or nearby land uses and resources. This is used to determine the probability of impact on sensitive receptors (such as schools, hospitals, residences) and on protected resources.
- Site map should show a ½ mile radius and include labels for water resources and key features such as parks, designated sensitive areas, and adjacent uses.

The project is located along the 6.5-mile length of the Geary corridor, a primary east-west arterial and transit spine in the northern half of San Francisco. The project 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; O’Farrell Street between Gough Street and Market Street¹; and various blocks of Market, Fremont, Beale, Mission, and First streets that comprise the route to and from the Transbay Transit Center.

Figure 8 through Figure 14 depicts the project limits, general project location, existing zoning, and various community facilities located along the Geary Corridor. The project limits, zoning and community facilities located along the Geary Corridor have not changed since publication of the FEIS.

¹ In addition, one inbound block of O’Farrell Street between Gough and Franklin Streets is technically named “Starr King Way” instead of O’Farrell Street.
Figure 8  The Geary Corridor between 48th Avenue and the Transbay Transit Center

Source: SFCTA, 2014
Figure 9  Existing Zoning - 48th Ave to Park Presidio
Figure 11  Existing Zoning - Fillmore Street to the Transbay Transit Center

Source: San Francisco Planning Department, 2017

Geary Corridor Bus Rapid Transit Project
Zoning Districts

Source: San Francisco Planning Department, 2017

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Figure 12  Public Services and Community Facilities Within the Study Area - 48th Avenue to Park Presidio
Figure 13: Public Services and Community Facilities Within the Study Area - Park Presidio to Fillmore Street
Figure 14  
Public Services and Community Facilities Within the Study Area - Fillmore Street to the Transbay Transit Center

Geary Corridor Bus Rapid Transit Project
Source: City and County of San Francisco
Date: 9/27/2013
C. METROPOLITAN PLANNING AND AIR QUALITY CONFORMITY: Is the proposed project "included" in the current adopted MPO plan, either explicitly or in a grouping of projects or activities? What is the conformity status of that plan? Is the proposed project, or are appropriate phases of the project included in the TIP? What is the conformity status of the TIP?

- Include the year of the adopted plan and the project number.
- Include date that the RTP was found to be conforming.
- Is the project description consistent with what is listed in the plan?

Approved Project
As described throughout the FEIS, the Metropolitan Transportation Commission (MTC) functions as both a regional transportation planning agency for state purposes, and for federal purposes as the region’s metropolitan planning organization (MPO). As such, MTC is responsible for regularly updating the Regional Transportation Plan (RTP). The most recent RTP/Sustainable Communities Strategy (SCS), Plan Bay Area 2040 was adopted in 2017. Improvements to local and rapid bus services are included as a major project in Plan Bay Area 2040, including BRT service on the Geary corridor. The Plan Bay Area 2040 Investment Strategy Report includes the Geary BRT project at $300 million as a high-performing project in the financially constrained plan.

MTC approved the 2017 Transportation Improvement Plan (TIP) in September 2016. The comprehensive four-year regional spending plan was subsequently updated to conform to Plan Bay Area 2040 in July 2017. The Federal Highway Administration (FHWA) and FTA determined the TIP to conform to the State Implementation Plan (SIP) on August 23, 2017. As the Geary BRT project is contained in Plan Bay Area 2040, and the TIP has been updated to conform to Plan Bay Area 2040, the Geary BRT project is also captured in the TIP.

The design, concept, and scope of the Hybrid Alternative/LPA analyzed in the FEIS is consistent with the project descriptions in the RTP and TIP, and also with the “open to traffic” assumptions of the regional analysis MTC conducted in association with its adoption of the RTP. The Hybrid Alternative/LPA is considered to have demonstrated regional conformity, as documented in the FEIS.

Project Changes
As the project changes are minor changes to bus stops, pedestrian facilities, and traffic signals, the redesigned project would remain in accordance with the TIP.

D. LAND USE AND ZONING: Description of zoning, if applicable, and consistency with proposed use. (attach maps).

- Consistency with zoning also includes consideration of adjacent uses.

Approved Project
As described in the FEIS, implementation of the Hybrid Alternative/LPA will not result in adverse construction or operational effects to surrounding land uses. Although short-term sidewalk closures, detours, conversion of parking lanes to travel lanes, and removal of loading zones will likely increase traffic and parking difficulties during project construction, these adverse effects will be temporary in nature and will adhere to applicable City policies for minimizing street disruption. Given this, temporary construction effects will not result in long-term adverse change to existing or planned land uses or any new physical division within a community. Additionally, the FEIS demonstrates that the Hybrid Alternative/LPA will be consistent with the City’s existing planning goals and policies. The FEIS found that the project will have no permanent adverse effects to land uses and will improve overall physical connectivity throughout the Geary corridor.

Project Changes
The changes to the Hybrid Alternative/LPA would result in temporary construction effects that are similar in nature and location to those currently analyzed in the FEIS. Moreover, the project changes may reduce construction duration in some areas where shorter bus stops would be constructed relative to those planned in the FEIS. During operation, project changes would be minor in comparison to the Hybrid Alternative/LPA and would not represent a substantial change
to the project evaluated in the FEIS. Bus stop lengths, pedestrian facilities, lane striping, and intersection signalization changes would not have the potential to effect the surrounding land uses. No permanent adverse effects to existing or proposed land uses would occur. Therefore, the project changes would not conflict with existing and planned land uses, nor divide an existing community. With implementation of the avoidance, minimization, and mitigation measures adopted for Community Impacts, as well as applicable City policies for minimizing street disruption, the changes to the Hybrid Alternative/LPA would not result in new or more severe land use effects during construction or operation.

### E. TRAFFIC AND PARKING IMPACTS:

Describe potential traffic impacts; including whether the existing roadways have adequate capacity to handle increased bus and other vehicular traffic. Describe potential impacts to on and off street parking.

- **Include parking impacts. Will there be a permanent loss of on-street or off-street parking?** Yes; on-street parking would be permanently removed in some locations as identified in the FEIS. The project changes would result in less parking removal in comparison to the Hybrid Alternative/LPA analyzed in the FEIS. See discussion below.

- **If the project includes a parking structure on an existing surface lot, what is the net increase in parking?** Neither the Hybrid Alternative/LPA nor the project changes feature a parking structure. The project would result in a net decrease in parking, rather than an increase. See discussion below regarding on-street parking effects resulting from implementation of the project and project changes.

- **Will there be increased bus services or will the project accommodate existing service?** As described in the FEIS, the project includes higher-frequency bus service. The project changes would not alter anticipated transit frequencies and traffic volumes analyzed in the FEIS. See discussion below.

- **Will the project require traffic signal work or modification of lanes (e.g. add turn lanes, removal of medians, removal of lanes, restriping, shifting location of lanes)?** Yes; the project would include the reconfiguring of existing lanes, restriping, and would entail signal modifications. Project changes would include adjustment of lane striping and signal modification at specified locations in comparison to the Hybrid Alternative/LPA analyzed in the FEIS. See discussion below.

#### Parking Impacts

**Approved Project**

As described in the FEIS, a total of 1,682 total on-street parking spaces currently exist along the Geary corridor. The parking supply analysis conducted for the FEIS determined the Hybrid Alternative/LPA will result in the loss of 410 on-street parking spaces between 34th Avenue and Market Street. A separate analysis of loading spaces was conducted to identify if loading spaces will be relocated within an acceptable distance of users (e.g. businesses receiving deliveries). The analysis determined that 10 commercial loading spaces and 2 passenger loading spaces will be removed along the Geary corridor. The Hybrid Alternative/LPA does not include a parking structure nor will it affect existing off-street parking.

The FEIS determined impacts associated with the net loss of parking and loading spaces will not be adverse. Notwithstanding, the FEIS recommended improvement measures I-PRK-1 through A-PRK-3 to enhance overall project performance.

**Project Changes**

The changes to the Hybrid Alternative/LPA would result in the removal of one off-street parking space but would add additional parking and loading spaces along the corridor, including the net retention or addition of 12 on-street general parking spaces, 12 general motorcycle spaces, 12 commercial loading zones, and 3 passenger loading zones compared to the Hybrid Alternative/LPA.

**Table 3** compares the retention of on-street parking and loading spaces compared to the Hybrid Alternative/LPA as analyzed in the FEIS. Positive numbers below indicate additional on-street spaces retained while negative numbers indicate the loss of an on-street space that would have
been preserved by the Hybrid Alternative/LPA. Note that the intersection of Geary Street and Van Ness Avenue is the only location that would lose more than one parking or loading space due to the project changes, which results in a reduction of six parking spaces at this intersection. However, this intersection is within two blocks of Franklin and Gough Streets where five spaces would be added due to the changes, resulting in negligible overall parking supply change in the area.

Table 3 Changes in On-street Parking and Loading Supply along Geary Boulevard, Geary Street, and O’Farrell Street (Hybrid Alternative/LPA versus Project Changes)

<table>
<thead>
<tr>
<th>Location</th>
<th>GENERAL PARKING SPACES</th>
<th>LOADING SPACES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>COMMERCIAL</td>
</tr>
<tr>
<td>Geary/Kearny (Outbound)</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Geary/Stockton (Outbound)</td>
<td>NA</td>
<td>+3</td>
</tr>
<tr>
<td>Geary/Powell (Outbound)</td>
<td>NA</td>
<td>+1</td>
</tr>
<tr>
<td>Geary/Leavenworth (Outbound)</td>
<td>+1</td>
<td>+2</td>
</tr>
<tr>
<td>Geary/Van Ness</td>
<td>-6</td>
<td>NA</td>
</tr>
<tr>
<td>Divisadero Street (Outbound)</td>
<td>+4</td>
<td>NA</td>
</tr>
<tr>
<td>O’Farrell/Grant (Inbound)</td>
<td>+12 motorcycle spaces</td>
<td>+1</td>
</tr>
<tr>
<td>O’Farrell/Van Ness (Inbound)</td>
<td>NA</td>
<td>+2</td>
</tr>
<tr>
<td>Divisadero Street (Inbound)</td>
<td>+3</td>
<td>NA</td>
</tr>
<tr>
<td>O’Farrell Street (Jones to Taylor)</td>
<td>NA</td>
<td>-1</td>
</tr>
<tr>
<td>Geary Boulevard (Franklin and Gough streets)</td>
<td>+5</td>
<td>NA</td>
</tr>
<tr>
<td>Geary/Gough</td>
<td>-1</td>
<td>NA</td>
</tr>
<tr>
<td>Geary/Laguna</td>
<td>+7</td>
<td>NA</td>
</tr>
<tr>
<td>Geary Boulevard (Webster to Fillmore streets)</td>
<td>NA</td>
<td>+1</td>
</tr>
<tr>
<td>Geary/Commonwealth/Beaumont</td>
<td>0</td>
<td>NA</td>
</tr>
<tr>
<td>Corridor total</td>
<td>+12</td>
<td>+12</td>
</tr>
</tbody>
</table>

Note: Consistent with the FEIS, general on-street parking spaces and commercial loading spaces were analyzed separately and thus, are not additive.

Measures I-PRK-1 through A-PRK-3 from the FEIS remain applicable and adequate to address impacts related to parking and loading which were identified in the FEIS, and shall be implemented. Based on the foregoing, the revised Hybrid Alternative/LPA would not result in any new or more severe effects related to parking and loading relative to what was described in the FEIS.

**Transit Service**

**Approved Project**

The primary evaluation metrics used to analyze transit conditions in the FEIS were transit travel time and travel time reliability. Overall, the project was found to have beneficial impacts to transit. No adverse transit effects or mitigation measures were identified.
Project Changes

Changes to Local and BRT Bus Stops
The project changes to accommodate two 60-foot articulated buses instead of three buses at bus stops and to consolidate both local and BRT bus services at one bus stop location are anticipated to improve transit conditions.

The consolidation changes would allow passengers to wait at one location and choose either the local or BRT service without having to walk to a separate location. This may reduce dwell times, since bus operators would not have to wait for passengers to walk between locations. It will also make bus stop locations more conveniently located closer to intersections rather than at mid-block, improving connectivity within the transportation network.

Consolidating BRT and local stops requires all buses to stop at the same location which may result in BRT buses pulling up behind a local bus, and therefore the need for BRT buses to pass local buses by pulling into mixed flow traffic if the BRT bus finishes loading first. Ample opportunities exist for passing along the corridor, and typical loading times for BRT and local buses are comparable, and thus it is unlikely that BRT buses would be delayed behind local buses such that operations of BRT buses would be effected. Both local and BRT buses receive the same transit-priority treatment as they travel along the corridor, so a local bus traveling in front of a BRT bus would not introduce an adverse transit delay.

O’Farrell between Leavenworth and Taylor: Changes to Planned Local and BRT Stops
Preservation of the existing stops and enhancement of transit infrastructure would better serve the community. The Jones/Taylor inbound stop would retain the existing mid-block bus stop and would extend the mid-block bus bulb by about 20 feet to the east towards Taylor Street to better allow two buses to load at the same time.

Changes at these locations would not affect transit travel time delay but would affect transit stop spacing. Transit stop spacing is discussed further below.

Laguna Stops: Construct Bus Bulbs in lieu of Transit Islands
Constructing transit bulbouts instead of transit islands at both the inbound and outbound approaches to Laguna Street would result in a condition where buses and right-turning vehicles share the same lane. Therefore, this change can be analyzed by considering instances when right-turning vehicles interact with buses. To determine how this change would affect transit service, SFMTA modeled the estimated difference in traffic signal delay between the bulbouts and the islands.

Traffic signal delay refers to the amount of time that a vehicle must wait at a signalized intersection. In this situation, traffic signal delay for the bus would include the time it takes for any queue of right-turning vehicles in front of the bus to proceed into the intersection ahead of the bus. Operational effects on transit would be considered adverse if the overall project would result in additional transit delay equal to or greater than half of the scheduled peak period headway. Buses currently run every 4 minutes on Geary Street, therefore the threshold is 2 minutes. With the project change, buses are estimated to experience an additional 3-5 seconds of signal delay at this intersection on average, compared to the Hybrid Alternative/LPA. This small amount of signal delay would not adversely effect overall BRT service. As presented in the FEIS, implementation of the Hybrid Alternative/LPA would reduce travel time along the Geary corridor by 16 to 18 percent in the year 2020, depending on the direction of travel.

Geary/Fillmore and Geary/Steiner Intersections: Retain Existing Turning Movements
The changes at the Geary/Fillmore and Geary/Steiner intersections would maintain the same turn restrictions as existing conditions. This would change the traffic signal timing at Steiner Street and the vehicle queuing operations at Fillmore relative to the Hybrid Alternative/LPA analyzed in the FEIS.

Under existing conditions at Fillmore Street in the eastbound direction, buses and vehicles share a travel lane and would continue to do so with the changes to the Hybrid Alternative/LPA proposed
by SFMTA. By continuing to permit left hand turns, buses may experience some transit delay when waiting for vehicles making left turns. However, based on the estimated 2020 traffic volumes, fewer than two vehicles per traffic signal cycle are anticipated to make the left turn on average. Under existing conditions, fewer than three vehicles are observed to make the left turn per cycle on average. Three left-turning vehicles could result in up to 6 seconds of transit delay to a bus on average, which is below the threshold of 2 minutes.

Moreover, there is no conflicting vehicle movement or pedestrian crossing with these left turns due to the physical geometry of the roadway structure, so automobile delays to vehicles making these turns would be minimal. Based on this information, no substantial transit delays to inbound buses are anticipated at Fillmore with implementation of this change. The Hybrid Alternative/LPA includes a dedicated bus lane at the Geary/Fillmore intersection in the outbound direction; therefore, continuing to permit left hand turns in this location would not affect outbound transit service.

At Steiner Street, maintaining the existing turn restrictions and traffic signal timing would improve bus service in the outbound direction by allowing the outbound movement more green time at the traffic signal.

**Summary**

With project changes, the total combined change in transit delay would be under 10 seconds.\(^2\) Based on modeling conducted for the project changes and the thresholds established in the FEIS, an incremental 10 second transit delay would not have the potential to adversely affect transit conditions, because a delay of 2 minutes is the applicable threshold for adverse effects. Service headways would remain the same as those described for the Hybrid Alternative/LPA in the FEIS. Overall, the Hybrid Alternative/LPA would result in a reduction in transit travel times compared to the No Build scenario. The expected minor increase in transit delay which would occur as a result of project changes would be very small relative to the project’s overall benefits to travel time, as discussed in the FEIS. Given this, an overall travel time benefit would remain and the project changes would not adversely affect transit travel time or reliability.

The FEIS did not identify adverse effects or mitigation measures for effects to transit. Based on the foregoing, the revised project would not result in any new or more severe effects related to transit, and no mitigation is required.

**Traffic Operations and VMT**

**Approved Project**

The FEIS used several evaluation metrics to measure the performance of the Hybrid Alternative/LPA in future year conditions in order to identify whether any adverse effects related to automobile traffic will occur. These metrics included auto travel time, LOS, and system-wide multi-modal delay. In addition, the FEIS analyzed how the project will affect Vehicle Miles Traveled (VMT). The FEIS determined that the Hybrid Alternative/LPA will result in approximately 20,000 fewer daily weekday VMT (0.1 to 0.4 percent) by 2020 and approximately 40,000 fewer daily VMT (0.4 percent) by 2035.

The FEIS concluded that the Hybrid Alternative/LPA will result in adverse LOS effects in the Geary corridor in 2020 and 2035. The FEIS found that the Hybrid Alternative/LPA will result in adverse LOS effects at four intersections on Geary Boulevard, and four additional intersection locations outside of the Geary corridor. No feasible mitigation measures were identified to reduce these adverse effects.

The FEIS also identified adverse effects to LOS at signalized intersections during construction. To reduce this effect, the FEIS includes the following measure:

- **CI-1**: A Transportation Management Plan that includes traffic rerouting, a detour plan, and public information procedures.

\(^2\) SFMTA, Geary: Project Refinements Transportation Analysis Technical Memorandum, August 8, 2018.
With implementation of this measure, construction-period LOS effects will not be adverse.

**Regulatory Updates**

Transportation impacts are analyzed below in accordance with new guidance from the California State Office of Planning and Research (OPR) adopted by the San Francisco Planning Commission in March 2016 (Planning Commission Resolution 19579). The San Francisco Planning Commission resolution:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality;

- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and lists of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change; and

- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and that are consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations but require additional environmental analysis.

Additionally, subsequent to the 2016 proposed CEQA Guidelines update from OPR, OPR published additional proposed text updating Section 15064.3 of the CEQA Guidelines (November 2017)³ and a technical advisory on evaluating transportation impacts using VMT (April 2018).⁴

While the regulatory changes above relate to CEQA, and the subsequent revision of San Francisco’s transportation impact evaluation methodology was for compliance with the State-level regulatory changes, the VMT methodology has been applied to the analysis of project changes under NEPA. The VMT method is consistent with the City’s current universally applied methodology for projects in San Francisco and current State CEQA regulations. LOS effects of the project changes are also discussed below for informational purposes, because LOS was San Francisco’s transportation metric used for impact evaluation at the time the DEIS was prepared. All feasible mitigation identified in the FEIS based on LOS analysis (Mitigation Measure CI-1) will still be implemented as part of the project.

**Project Changes**

As discussed above, the analysis in this document uses VMT as the measurement for analysis of transportation effects, and this methodology has been applied below. This is consistent with the San Francisco Planning Commission’s adopted resolution on VMT and the City and County of San Francisco’s application of this standard for the environmental review of all projects in San Francisco. All other thresholds for measuring impacts to traffic and transportation, aside from LOS, described in the FEIS remain in effect and are incorporated here by reference.

For the purpose of VMT analysis, the following criteria is used for all projects in San Francisco to determine whether implementing the project changes would result in adverse effects to transportation and circulation related to VMT:

A project would have an adverse effect on VMT if it would:

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³ The proposed text is available at [http://opr.ca.gov/docs/20171127_Text_of_15064-3.pdf](http://opr.ca.gov/docs/20171127_Text_of_15064-3.pdf)

⁴ The technical advisory is available at [http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf](http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf)
• Cause substantial additional VMT; or
• Substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network.

The project, being a transit improvement project, is among the types of projects known not to increase VMT or automobile travel. The scope of the project includes conversion of general travel lanes to transit-only lanes, removal of some street parking spaces, sidewalk widening (bus bulbs), crosswalk improvements, signal timing changes to prioritize transit and pedestrian safety, and bus stop improvements. No increase of physical roadway capacity, creation of new roadways, or creation of new mixed-flow travel lanes would occur. Therefore, the project would not have adverse VMT effects.

The project changes would consist of bus stop, traffic signal, and lane modifications. The changes would enhance transit capacity and performance, and would not add physical roadway capacity, mixed-flow travel lanes, or new roadways. The project changes all fall within the scopes of work known not to increase VMT or automobile travel. Therefore, the project changes would not have the potential to cause adverse VMT effects. Additional supporting analysis is provided in the subsections below.

As noted in the Regulatory Updates discussion above, San Francisco has replaced the LOS metric with the VMT metric during the time since the DEIS was prepared. The potential LOS effects of the project changes have been evaluated and disclosed in the following subsections for informational purposes only. The majority of the project changes would not have the potential to affect traffic operations; changes to bus stop length, bus stop design, and pedestrian facilities would, by their nature, not influence traffic patterns. Therefore, the discussion below focuses on the following project changes, which could potentially affect traffic operations:

- Geary from Polk to Van Ness: Convert Existing Lane into Shared Left Turn/Through Lane
- Geary/Laguna Stops: Construct Bus Bulbs in lieu of Transit Islands
- Geary/Webster: Restrict Outbound U-turns
- Geary/Fillmore and Geary/Steiner Intersections: Retain Existing Turning Movements

**Geary from Polk to Van Ness: Convert Existing Lane into Shared Left Turn/Through Lane**

The FEIS determined implementation of the Hybrid Alternative/LPA will increase automobile delay by approximately 10 seconds at the Van Ness/Geary intersection in 2020. The intersection will continue to operate at LOS E which is the same LOS as the No Build alternative. The FEIS identified this as an adverse effect, and no feasible mitigation measures were identified.

Under the project changes, the Van Ness/Geary intersection would experience an additional automobile delay of approximately 9.8 seconds for the westbound approach as a result of converting the existing through lane into a shared left turn lane. This averages out to an additional delay of 2.9 seconds at this intersection. The 10 second delay anticipated in the FEIS combined with the additional 2.9 second increase would result in the intersection operating at LOS F, however, the LOS E and LOS F categories only represent cut-off points for describing intersection operations and do not necessarily equate to substantial differences in delay. While this analysis does not use LOS as a measure of transportation impacts, if LOS was used as a standard, an increased delay of 2.9 seconds would not represent a substantial increase in delay at this intersection.

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6 Ibid

7 SFMTA, Geary: Project Refinements Transportation Analysis Technical Memorandum, August 8, 2018.

8 Ibid
intersection. Accordingly, the effect at this intersection would not be substantially more severe than described in the FEIS.

Making adjustments to general travel lanes that do not increase traffic speeds or roadway capacity are among the scopes of work known not to increase VMT.\(^9\) The proposed modifications to the project along Geary from Polk to Van Ness would therefore not cause or contribute to adverse effects to VMT.

**Geary/Laguna Stops: Construct Bus Bulbs in lieu of Transit Islands**
The FEIS determined implementation of the Hybrid Alternative/LPA will result in a change from LOS C to LOS E at the Geary/Laguna intersection in 2020. The FEIS identified this as an adverse effect, and no feasible mitigation measures were identified.

Project changes include bus bulbs which would be constructed in place of transit islands along both the eastbound and westbound approaches. These changes would force buses and vehicles to share the right-turn lane. Consequently, the average automobile delay to right-turning vehicles would increase by approximately 2 seconds.\(^10\) Since right-turn volumes are very low relative to through volumes, this additional automobile delay to the right-turning vehicles is not anticipated to affect the overall average level of service. While this analysis does not use LOS as a measure of transportation effects, if LOS was used as a standard, an increased delay of 2 seconds would not represent a substantial increase in delay. Accordingly, the effect at this intersection would not be substantially more severe than described in the FEIS.

The addition of bus bulbs and transit boarding islands are among the scopes of work known not to increase VMT.\(^11\) The proposed modifications to the project at the Geary/Laguna intersection would therefore not cause or contribute to adverse effects to VMT.

**Geary/Webster: Restrict Outbound U-turns**
The FEIS determined that the Geary/Webster intersection will continue to operate at LOS E in 2035 with implementation of the Hybrid Alternative/LPA. Accordingly, the FEIS determined that the Hybrid Alternative/LPA will not result in adverse effects.

The project changes include restricting westbound U-turns at the Geary/Webster intersection. The existing volume of outbound U-turns observed at this intersection is relatively low, at an average of 15 vehicles in the peak hour (observed in 2012). Vehicles that use the U-turn under existing conditions are anticipated to take alternate routes, which were modeled to determine whether this redistribution of vehicle trips would result in changes to intersection operations. Based on the modeling completed, restricting the outbound U-turn would increase peak hour traffic volumes on Webster Street by less than 2 percent, or 1 second of automobile delay,\(^12\) and would not affect other intersections. While this analysis does not use LOS as a measure of transportation effects, if LOS was used as a standard, an increased delay of 1 second would not represent a substantial increase in delay. Accordingly, the project changes along this segment would not result in a new adverse effect, or increase the severity of effects described in the FEIS.

The removal of U-turns is among the scopes of work known not to increase VMT.\(^13\) The proposed modifications to the project at the Geary/Webster intersection would therefore not cause or contribute to an adverse effect to VMT.

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\(^10\) SFMTA, Geary Project Refinements Transportation Analysis Technical Memorandum, August 8, 2018.

\(^11\) Ibid

\(^12\) Ibid

**Geary/Fillmore and Geary/Steiner Intersections: Retain Existing Turning Movements**

Allowing left turns in the eastbound and westbound directions at the Geary/Fillmore intersection could affect intersection operations if excessive vehicle queuing on the overpass structure exceeded the length of the queueing space available on the overpass structure, causing a spillback of vehicles to queue in the travel lane on Geary Boulevard. Based on modeling, the project changes will result in an average of two vehicles making the left turn in the eastbound direction per traffic signal cycle.\(^\text{14}\) This will not result in vehicle queuing exceeding the overpass queue length capacity, which is about four vehicles. Likewise, in the westbound direction, less than one vehicle per traffic signal cycle is anticipated to make the left turn, which will not result in extensive queuing.

Under the project changes, eliminating the protected eastbound left-turn at the Geary/Steiner intersection proposed in the Hybrid Alternative/LPA would improve traffic operations in the westbound approach from LOS D to LOS B, and would not affect LOS in the eastbound direction. This change would result in a traffic improvement over what was analyzed in the FEIS at this intersection.

The installation, removal, and reconfiguration of traffic lanes that are not for through traffic (such as left turn lanes) are among the scopes of work known not to increase VMT.\(^\text{15}\) The proposed modifications to the project at the Geary/Fillmore and Geary/Steiner intersections would therefore not cause or contribute to an adverse effect to VMT.

**Summary**

As indicated above, the project changes would not include a parking structure, would not result in a new adverse effect to traffic, or represent a substantial change to the project. As described above, individual increases in automobile delay would not be considered substantial under the LOS metric, and would therefore not result in new or more severe adverse effects compared to the FEIS.

The project, being a transit improvement project, is among the types of projects known not to increase VMT.\(^\text{16}\) The scope of the project includes conversion of general travel lanes to transit-only lanes, removal of street parking spaces, sidewalk widening (bus bulbs), crosswalk improvements, signal timing changes to prioritize transit and pedestrian safety, and bus stop improvements. The proposed modifications, which consist of minor adjustments to bus stop sizes and location, turning restrictions, additional pedestrian improvements, and signal timing changes to optimize transit vehicle and bicycle/pedestrian movements, are also among the scopes of work known not to increase VMT. Therefore, the revised project would not result in an adverse effect to VMT.

As previously mentioned, **Mitigation Measure CI-1** from the FEIS shall be implemented to reduce construction-period impacts at signalized intersections to not be adverse. This measure remains applicable and adequate to address construction LOS impacts identified in the FEIS, and shall be implemented as part of the project.

Based on the foregoing, the revised project would not result in any new or more severe adverse effects to traffic circulation or VMT relative to what was described in the FEIS.

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\(^{14}\) SFMTA, Geary Project Refinements Transportation Analysis Technical Memorandum, August 8, 2018.
\(^{15}\) San Francisco Planning Department, Planning Commission Resolution No. 19579, Transportation Sustainability Program – Align Component, Case No. 2012.0726E, March 3, 2016.
\(^{16}\) San Francisco Planning Department, Planning Commission Resolution No. 19579, Transportation Sustainability Program – Align Component, Case No. 2012.0726E, March 3, 2016.
F. CO HOT SPOTS: If there are serious traffic impacts at any affected intersection, and if the area is nonattainment for CO, demonstrate that CO hot spots will not result.

- Is the area in an attainment or non-attainment area?
- Will the project exacerbate conditions of an existing hotspot or non-attainment area?

Approved Project
The project is located within a Carbon Monoxide (CO) attainment area. To assess transportation conformity with the CAA for the EIS, regional and project-level air quality conformity analyses were conducted. Regional conformity was determined by reviewing the current RTP and TIP to establish whether the project is incorporated and thus covered for regional conformity. To determine project-level conformity, hot spot analyses were conducted for carbon monoxide and particulate matter (PM) 10 and PM2.5. CO concentrations throughout the state have steadily declined over time as vehicle engines have become more efficient and less polluting. The Bay Area Air Quality Management District (BAAQMD) has recognized this trend and completed technical analyses that indicate that there is no potential for a carbon monoxide hotspot to occur when:

- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway). The fact that the Geary corridor study area is a highly developed urban area with multi-story buildings and contains streets with canyon-like air dispersion characteristics means that this criterion may be applied to certain blocks along the Geary corridor and some of its parallel streets.

The EIS concluded that the Hybrid Alternative/LPA will not increase traffic volumes at any intersection in the traffic study area to more than 24,000 vehicles per day.

Project Changes
As traffic volumes would not be affected by the project changes, the project changes do not have the potential to result in a new localized carbon monoxide violation, or adverse operational effects.

G. HISTORIC RESOURCES: Describe any cultural, historic, or archaeological resource that is located in the immediate vicinity of the proposed project and the impact of the project on the resource. Discuss State Historic Preservation Officer (SHPO) consultation and findings. Discuss consultation with the Native American Heritage Commission (NAHC) and other Native American groups. Attach any relevant correspondence.

- Are there any sites eligible for listing in the National Register of Historic Places? The FEIS identified properties and historic resources eligible for listing. The project changes would require relocation of one historic light standard, as described below. Relocation of these light standards was anticipated in the FEIS.
- Is the project located in the vicinity of a Historic District? The project APE includes one historic district, and SHPO concurred no adverse effects to historic resources would occur, as described below. The project changes are consistent with the type and location of work anticipated in the FEIS.
- Is SHPO coordination required? SHPO coordination was completed for the FEIS. No further SHPO coordination is required to address project changes. SHPO coordination completed for the FEIS is described below.
- Has a request of a search of the Sacred Lands File from the Native American Heritage Commission completed? These searches were completed for the FEIS and remain adequate to address project changes.
- Has coordination been conducted with Native American Groups? (Note: Native American consultation, particularly for federally recognized tribes, must be conducted through FTA). Coordination was completed for the FEIS as described below. No further coordination is required to address the project changes.
Approved Project

The FEIS analyzed the potential for the Hybrid Alternative/LPA to result in adverse effects to cultural resources, including archaeological resources, paleontological resources, and historic architectural resources. The FEIS identified adverse effects to cultural resources. To reduce these impacts, the FEIS included the following mitigation measures:

- **CUL-C1 through CUL-C4** address vibration affects and delineate necessary monitoring that would be conducted during construction.
- **CUL-C5** addresses the desired avoidance of removal, relocation, or damage to the historic Japan Center light standards. However, CUL-C6 delineates the process and necessary precautions associated with relocation of the Japan Center light standards.
- **CUL-C7** requires the careful consideration of visual qualities of built elements of the project and existing historic properties.
- **CUL-C8 through CUL-C11** chart out necessary research processes and preparation of the Final Archaeological Resources Report documenting all field and laboratory methods, analysis, and findings.
- **CUL-C12 through CUL-C14** identify the necessary procedures following discovery of buried cultural resources, human remains, and paleontological resources, respectively.

With implementation of these mitigation measures, no adverse effects to cultural resources will occur.

As discussed in the FEIS, the lead agency contacted the Native American Heritage Commission (NAHC) on November 21, 2008, and requested that they conduct a search of their Sacred Lands file to determine if there were known cultural sites within or near the Area of Potential Effect (APE) for the project. On December 5, 2008, the NAHC responded stating that no Native American cultural resources were reported from the Sacred Lands file records search. A list of interested Native American groups and individuals was also requested on November 21, 2008. All six contacts on that list were sent letters requesting input on December 8, 2008. A follow up email was then sent to all six contacts on February 19, 2009. Only one contact responded requesting a copy of the study in order to comment appropriately. No further responses were received and SHPO concurred that the project will have no adverse effects to archaeological resources in October 2017.

Surveys of the architectural APE identified 123 buildings or groups of buildings and structures that underwent formal evaluation. Of these properties:

- 70 are not eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR).
- 31 are currently listed in the NRHP and the CRHR (Table 4.5-1)
- 22 are eligible for the NRHP (Table 4.5-2)
  - 21 through previous survey efforts
  - 1 found eligible as a result of this project’s study (St. Francis Square Cooperative).

The 53 properties identified as either currently listed in the NRHP and/or the CRHR as well as those that are eligible for the NRHP are considered historical resources. All but one of the 31 properties listed in the FEIS are located east of Van Ness Avenue. Approximately 18 of these structures have mixed-use functions, and the remainders are residential. Thirty of these historical resources are located within the federally recognized Uptown Tenderloin Historic District (and are considered contributing elements thereto). SHPO concurred with the results of the surveyed historic architectural resources discussed in the FEIS and concurred in October 2017 that the project will have no adverse effects to historic architectural resources.

**Project Changes**

Of the project changes described above, construction of the following three would require additional excavation outside the construction footprint identified in the FEIS:
• Geary Boulevard between Webster and Fillmore streets: Sidewalk Width Reduction and New Loading Zones
• Geary/Masonic Outbound Stop Sidewalk Widening
• Geary/Commonwealth/Beaumont and Geary/Gough Intersections: Additional Pedestrian Bulbs

**Historic Resources**

Implementation of the sidewalk narrowing near Fillmore Street would require the relocation of a Japan Center Light Standard currently located along Geary Boulevard between Webster and Fillmore streets. Mitigation measures CUL-C5 and CUL-C6 from the FEIS shall be implemented and remain adequate to address this effect.

**Archeological Resources**

Although additional excavation would be required for each of the above project changes, the FEIS indicated that none of the formally recorded archaeological sites identified within the vicinity of the project were located within the areas where excavation would occur. The project changes would require additional excavation in areas determined to have low sensitivity in the FEIS. No excavation in areas with higher sensitivity is proposed. Furthermore, the project changes would not require deeper excavation than anticipated in the FEIS. Thus, the project changes would not have the potential to result in any disturbance to previously recorded archaeological sites, and would have a low potential to encounter unrecorded resources.

Mitigation measures CUL-1 through CUL-14 from the FEIS remain applicable and adequate to address effects to paleontological, archaeological, and architectural resources located within the Geary corridor, and shall be implemented.

**Summary**

Based on the foregoing, the changes to the project would not result in any new or more severe adverse effects to cultural resources relative to what was described in the FEIS.

H. **NOISE:** Compare the distance between the center of the proposed project and the nearest noise receptor to the screening distance for this type of project in FTA's guidelines. If the screening distance is not achieved, attach a "General Noise Assessment" with conclusions.

- Identify sensitive noise receptors, including residences, outdoor eating areas, parks, outdoor public gathering places, etc. Are there outdoor pools?
- What is the distance of the closest sensitive receptor?
- Are there existing noise barriers (walls, earthen berms, etc.) or intervening structures?

**Approved Project**

As reflected in the FEIS, the Hybrid Alternative/LPA will adhere to the San Francisco Noise Ordinance and will not result in adverse construction noise impacts. Similarly, the FEIS concluded the Hybrid Alternative/LPA will not exceed FTA noise significance criteria, and in turn, will not result in adverse operational noise impacts.

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17 During consultation with SHPO during preparation of the FEIS, additional assessment of the level of paleontological and archaeological sensitivity throughout the APE was conducted. In a letter to SHPO dated September 2017, FTA confirmed that project excavation would not occur in areas where archeological resources are likely to be present. The analysis concluded that project features requiring excavation deeper than three feet are limited to areas within the historic-era footprint of Geary Blvd (low sensitivity for historic-era resources) and/or areas that were previously disturbed by installation of subsurface infrastructure in the 1960’s or later (any deposits present would lack integrity). In a handful of locations where excavation might encroach upon soils where researchers could not confirm prior disturbance with certainty, SFMTA’s engineers refined the subsurface designs of the associated project features to ensure that excavation would remain within soils known to be previously disturbed. This effort led FTA to conclude with added confidence that the potential to encounter archeological resources is low at all proposed excavation locations, and the SHPO concurred that the project would have no adverse effect on archeological resources.
Project Changes
The project changes would result in construction activities and associated noise impacts similar to those occurring elsewhere throughout the corridor. The project changes may reduce construction duration in some areas where shorter bus stops would be constructed. Some project changes would require additional construction, such as the addition of pedestrian bulbs. However, the construction durations for project changes would be within those discussed in the FEIS. Given the relatively short duration of such activities and their location within the public right-of-way limits, the project changes would not have the potential to increase the severity of any previously identified construction-period noise effects. Additionally, the majority of the project changes would not alter traffic conditions. The project changes that would alter traffic conditions would not have the potential to alter traffic noise beyond the extent discussed in the FEIS. Given this, the project changes would not result in new or more severe adverse noise effects.

I. VIBRATION: If the proposed project involves new or relocated steel tracks, compare the distance between the center of the proposed project and the nearest vibration receptor to the screening distance for this type of project in FTA's guidelines. If the screening distance is not achieved, attach a "General Vibration Assessment" with conclusions.

Approved Project
The FEIS determined the Hybrid Alternative/LPA will not result in vibration effects during construction with implementation of Measure MIN-NOISE-C1 through MIN-NOISE-C5 from the FEIS. These mitigation measures shall be implemented. No adverse construction or operational vibration effects will occur.

As discussed in the FEIS, the Hybrid Alternative/LPA will not involve other significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Geary corridor will be generated by vehicular travel on the local roadways. Compared to existing conditions, bus-related vibration under the Hybrid Alternative/LPA will increase slightly as a result of side-running bus lanes that will bring bus activity closer to sensitive receptors. However, this would not be substantial enough to result in an adverse effect. Similar to existing conditions, project-related traffic vibration levels will not be perceptible to sensitive receptors. Thus, operational vibration will not result in an adverse effect.

Project Changes
The project changes would not have the potential to result in additional sources of vibration, nor would the project involve new or relocated steel tracks. Given the relatively short duration of construction activities and their location within project site, the project changes would not result in new or more severe vibration effects. During operation, the project changes would not introduce other significant stationary sources of ground-born vibration, nor would they generate additional traffic vibration.

J. ACQUISITIONS & RELOCATIONS REQUIRED: Describe land acquisitions and displacements of residences and businesses. Include discussion of any permanent or temporary easements required.

• Include discussion of temporary construction easements (if not already included in the construction section) and partial acquisitions.

Approved Project
As described in the FEIS, no acquisitions of any private land or use of other public land will be needed during construction of the project. Temporary construction easements were not specified in the FEIS.

Project Changes
The project changes would not require additional land acquisitions or displacements of residences or businesses. One parking space in a public parking lot on City property would be repurposed to build a new bus shelter at Masonic Avenue. All other aforementioned changes would be completed in the public right of way and would not require the acquisition of private property.
Therefore, the project changes would not result in new or more severe effects to acquisitions or relocations of residences and businesses.

K. **HAZARDOUS MATERIALS:** If real property is to be acquired, has a Phase I site assessment for contaminated soil and groundwater been performed? If a Phase II site assessment is recommended, has it been performed? What steps will be taken to ensure that the community in which the project is located is protected from contamination during construction and operation of the project? State the results of consultation with the cognizant State agency regarding the proposed remediation?

- Is there current, ongoing remediation?
- Resource: [http://geotracker.waterboards.ca.gov](http://geotracker.waterboards.ca.gov)

**Approved Project**

An Initial Site Assessment (ISA) was conducted for the Geary corridor in August 2013 in accordance with American Society for Testing and Materials (ASTM) E-1527 guidelines. The ISA included an Environmental Data Resources (EDR) records search with federal, state, tribal, and local queries pertaining to past and present hazardous materials use, storage, generation, disposal, and release on properties near the Geary corridor. Additionally, the ISA included a site reconnaissance report to visually evaluate potential evidence of hazardous material leaks. While the ISA was drafted in 2013, conditions within the project area have not substantially changed during this time. Land uses have remained relatively unchanged; therefore there is a low likelihood of new contamination or new sources of hazardous materials in the area. The FEIS contains requirements that additional testing and subsurface investigations be conducted prior to construction, which will ensure any new or previously unidentified contamination is addressed.

The Hybrid Alternative/LPA will have both side-running and center-running bus-only lanes, depending on location. Stations and stops will be located in the median where the bus lane is center-running and at bus bulbs where the bus lane is side-running. As a result, the Hybrid Alternative/LPA will only disturb existing medians where the center-running bus lane will occur between 27th/28th Avenue and Palm Avenue. Construction activities will potentially result in exposure risk from hazardous materials, aerially deposited lead (ADL) in the soil, naturally-occurring asbestos, lead, and other environmental concerns, especially in areas where the Hybrid Alternative/LPA will remove existing medians. Based on the groundwater depths mentioned in Section P (Impacts on Water Quality, Navigable Waterways, & Coastal Zones) below, excavation to these relatively shallow depths will be highly unlikely to encounter groundwater. Should groundwater be encountered during excavation activities, consistent with all applicable federal and state regulations, the water will be pumped from the excavated area, contained and treated before being discharged, most likely to the existing local (combined) sewer system. SFPUC requires a batch discharge permit prior to commencement of discharge to the combined sewer system.

Prior to excavation and construction, adherence to hazardous material guidelines for collection; disposal, handling, release, and treatment of hazardous material; site remediation; and worker safety and training will be required. In constructing the Hybrid Alternative/LPA, SFMTA, in consultation with SFDPH, will develop, prescribe, and update such hazardous material guidelines. The guidelines shall require any of the alternatives to comply with all federal, state, and local laws regarding hazardous material, including the Maher Ordinance.

**Project Changes**

Project changes would be limited to modifications to existing or planned transit stops, minor adjustments to parking and loading spaces, and other minor physical and operational changes. Project changes would occur within the existing street right-of-way or adjacent parking areas, and the intensity and duration of construction activities are anticipated to decrease or remain unchanged. Therefore, the project changes would not result in new or more severe impacts related to hazardous materials or contamination during construction and operation of the project.
L. COMMUNITY DISRUPTION AND ENVIRONMENTAL JUSTICE: Provide a socio-economic profile of the affected community. Describe the impacts of the proposed project on the community. Identify any community resources that would be affected and the nature of the effect.

- Will the project physically divide a community?
- Will the project affect community character (add a feature that would be obtrusive or not consistent with its surroundings)?
- Does the project have the potential to disrupt community activities or community uses (e.g. community centers, parks, churches, etc.)
- Discuss if the project would or would not result in disproportionate high and adverse effects to environmental justice communities. Mention project benefits.

Approved Project

As discussed in the FEIS, most of the environmental effects of the project alternatives will be predominantly borne by EJ communities because most of the corridor consists of EJ communities. However, these environmental effects will occur across the study area and similar mitigation shall be implemented in environmental EJ and non-EJ communities. For several environmental topic areas, the Hybrid Alternative/LPA will result in beneficial effects, including improved access to transit service, improved travel times, increased transit capacity, reliability and connectivity between residential areas, community facilities, employment centers, and local businesses, particularly for higher densities of minority and low-income populations in the eastern portion of the Geary corridor. Other benefits include an enhanced visual environment and landscape, improved air quality, decreased pedestrian crossing distances, pedestrian-scale lighting, improved bus shelters and bulbouts, and other urban design features. Automobile transportation is the only environmental topic area where an adverse effect will remain following implementation of feasible avoidance, minimization, and mitigation measures from the FEIS.

Mitigation measures of a similar type and quality from the FEIS shall be implemented throughout the study area in both EJ and non-EJ communities. Therefore, following the implementation of mitigation and the consideration of off-setting benefits, the FEIS concluded the Hybrid Alternative/LPA will not result in disproportionately high or adverse effects in EJ communities.

Project Changes

As described above, the project changes would not result in new adverse effects for any environmental topic. Therefore, no new adverse effects would occur in EJ communities. All avoidance, minimization, and mitigation measures identified in the FEIS shall be implemented as described in the FEIS, which includes equal measures in both EJ and non-EJ communities.

Traffic

As described above, using the VMT metric, project changes would not result in an adverse effect to VMT. For informational purposes, LOS effects were provided and demonstrated that overall intersection delay would be less than 10 seconds at any intersection, including in both EJ and non-EJ communities. Therefore, project changes would not result in new or more severe adverse effects to EJ communities, because no new adverse effects would occur anywhere in the project area.

Transit

The project changes would overall result in 10 seconds of additional transit delay throughout the Geary corridor. As the applicable delay threshold is 2 minutes, the project changes would not have the potential to adversely affect transit conditions in EJ or non-EJ communities. Transit delay at specific locations along the corridor would be between 3 and 6 seconds, which would not adversely effect transit conditions. The expected increase in transit delay would be very small relative to the project’s overall benefits to travel time discussed in the FEIS. An overall travel time benefit would remain. Thus, the changes would not adversely affect transit travel time or

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reliability, and in turn, would not result in new or more severe adverse effects to EJ communities, since no new adverse effects would occur anywhere in the project area.

Parking
The project changes would result in an overall increase in parking and loading spaces retained corridor-wide compared to the FEIS (i.e. fewer parking spaces would be removed than identified in the FEIS). All additional spaces retained would be located within EJ communities, resulting in a net benefit.

Pedestrian and Bicycle Conditions
Project changes would improve pedestrian and bicycle safety at several locations along the corridor. Safety would improve as a result of additional pedestrian bulbs and the continued restriction of left turns in the eastbound direction at the Geary/Steiner intersection. The left turn restriction would lower risks for bicyclists using the Steiner Street bike route. Locations with improved pedestrian and bicycle safety would include but not be limited to: Geary/Laguna, Geary/Steiner, and Geary/Fillmore. As all aforementioned improvements are located within EJ communities, these communities would experience a net benefit.

Construction
Overall the project changes would reduce construction duration in some locations and require slightly longer construction in other areas. Where construction duration would increase, the change would be minor and construction duration would remain within the durations anticipated in the FEIS. Project changes, especially the shortening of bus stop lengths, would be dispersed across the first phase of the project and would be of similar magnitude within both EJ and non-EJ communities.

Summary
Based on the foregoing, implementation of project changes would not result in new or worsened effects to traffic, parking, or pedestrian and bicycle safety, nor would they affect resources particularly important to EJ communities. Effects in EJ communities would remain of a similar nature and magnitude as effects in non-EJ communities and would remain of a similar nature and magnitude as described in the FEIS. Mitigation measures from the FEIS are still relevant and appropriate to address impacts within and outside of EJ communities and shall be implemented. Further, adverse effects to non-EJ communities have not been reduced to such an extent that remaining effects are disproportionally borne to EJ communities within the project area. As described in the FEIS, project effects in EJ communities would be offset by beneficial effects of the project, which would continue to accrue in similar nature and magnitude in both EJ and non-EJ communities. Thus, the project changes would not result in disproportionately high or adverse effects in EJ communities.

SECTION 4(f) USE: Indicate parks and recreational areas, historic resources and any other Section 4(f) resources on the site map. If the activities and purposes of these resources will be affected by the proposed project, state how. State if the project will result in a use (direct and/or constructive use) or temporary occupancy of a Section 4(f) resource. If the project results in a Section 4(f) use, would the impacts be considered de minimis?

- Will the project require right-of-way, any parks, recreation areas, historic resources or other Section 4(f) resources?
- Will the project change access or require temporary closures or detours of any Section 4(f) resource?
- What is the distance of the closest park?
- Mention any temporary use or temporary occupancy (including any temporary construction easements or construction staging areas) at any parks, recreation areas, historic resources, or other Section 4(f) resources.
- Mention consultation with agencies of jurisdiction (e.g. City Parks and Recreation departments, etc.).
Approved Project
As described in the FEIS, the Hybrid Alternative/LPA would not result in the permanent incorporation of any park or recreational Section 4(f) resources. There are 38 park and recreational properties in or in close proximity (0.5-mile radius) to the Geary Corridor. Five of these properties are located directly adjacent to the Geary Corridor. However, the project would not use any park or recreational facility, since the project would be located entirely within the existing Geary corridor or immediately adjacent to sidewalk areas where no public parks or recreational facilities exist.

The FEIS determined that none of the known archaeological resources within the APE were found to warrant preservation in place, and therefore are not considered Section 4(f) resources. The FEIS analyzed three potentially eligible historic architectural resources that are considered Section 4(f) resources located within the Geary corridor right-of-way. These historic architectural resources include the “Golden Triangle” streetlights, the Japan Center lighting standards, and the Auxiliary Water Supply System (AWSS). The Hybrid Alternative/LPA will include streetscape improvements within the vicinity of the Golden Triangle streetlights, the Japan Center lighting standards, and the AWSS. As described in the FEIS, construction of the project may require the removal and relocation of one or more lighting standards. The relocation of the Japan Center lighting standards is considered a direct use of historic properties; however, these historic elements would retain overall integrity of setting, feeling, and association. Mitigation measures CUL-C5 and CUL-C6 from the FEIS addressed the desired avoidance of removal, relocation, or damage to the historic light standards, and delineated the process and necessary precautions associated with relocation, resulting in a de minimis use.

Project Changes
Sidewalk narrowing would require relocation of one Japan Center light standard, and relocation would adhere to appropriate Secretary of the Interior’s Standards for the Treatment of Historic Properties (SOI Standards). Moreover, FEIS mitigation measure CUL-C6 remains applicable and adequate to maintain the historic integrity of the light standard when moved to a different location, and shall be implemented.

The additional pedestrian waiting area at Geary/Masonic would be outside the existing right-of-way but would not affect any 4(f) resource. All other project changes would be located within the existing right-of-way. Similar to pedestrian bulbs included in the Hybrid Alternative/LPA, additional pedestrian bulbs would be extensions of existing curbs toward the street and would not encroach on any park or recreational facility.

Based on the foregoing, the project changes would not affect any identified Section 4(f) resource beyond what was analyzed by the FEIS, thus, no new or more severe adverse effects to Section 4 (f) resources would occur.

N. IMPACTS ON WETLANDS: Show potential wetlands on the site map. Describe the project’s impact on on-site and adjacent wetlands.
- Are there wetlands within the project vicinity?
- Will the project directly drain into a waterway supporting wetlands?
- Will the project require alteration of surface water features, wetlands, navigable waterways, or waters of the U.S. (e.g. channels, stormdrains…)?
- Will the project require permits (e.g. Clean Water Act Section 404 permit)?

Approved Project
As described in the FEIS, the project is fully urbanized and does not contain wetlands. The project site is almost entirely covered with impervious surfaces, with the exception of landscaped center medians and some street trees and landscaping on sidewalks. There are no waters of the United States in the project area that will be affected by the Hybrid Alternative/LPA.
Project Changes
Project changes would be within the original project footprint or adjacent public property which is fully developed and does not contain wetlands, as documented in the FEIS. Therefore, project changes would not result in new or more severe effects to wetlands.

FLOODPLAIN IMPACTS: Is the proposed project located within the 100-year floodplain? If so, address possible flooding of the proposed project site and flooding induced by proposed project due to its taking of floodplain capacity.

- Will the project introduce a large structure that will change floodplain elevations or floodways?
- Resource: The FEMA Flood Map Service Center (MSC) is a public source for flood hazard information produced in support of the National Flood Insurance Program (NFIP). Use the MSC to find your official flood map, access a range of other flood hazard products: http://msc.fema.gov/portal

Approved Project
As described in the FEIS, the project is not within any mapped flood hazard zone, nor is it in an area that will be inundated by the failure of a dam or reservoir. Consequently, the project will not introduce a large structure that will change floodplain elevations or floodways.

Project Changes
The project changes would be within the original project footprint, with the exception of an additional off-street parking space on City property. Project changes would not include any additional large structures. Thus, there would be no change to the project’s potential effects on floodplains from those described in the FEIS.

IMPACTS ON WATER QUALITY, NAVIGABLE WATERWAYS, & COASTAL ZONES:
Describe surface and ground water resources in the project vicinity and their approximate distance to the project. State if any Clean Water Act 303d Listed Impaired Water Bodies are in the project vicinity. Explain if the project would alter or create a new direct connection to a surface water body. If any of these are implicated, provide detailed analysis.

- Describe any surface water features. Where will the water drain into?
- What is the distance of the closest surface water body?
- What is the distance to the coast? Is the project located in a designated coastal zone?
- Will the project affect Clean Water Act 303d listed impaired water bodies?

Approved Project
As described in the FEIS, the western portion of the project is located within the Lobos and Westside groundwater basins, while the eastern portion is located in the Downtown San Francisco basin. The depth to groundwater is typically about 50 feet below ground surface (bgs) in the western portion of the project, rising to about 10 to 30 feet bgs in the eastern portion. Based on the groundwater depth, project excavation will be highly unlikely to encounter groundwater. Once operational, the various project components and new BRT service will have little to no effect on groundwater as the project will reduce impervious area and groundwater use is anticipated to be low.

The closest surface water body is the Central and South San Francisco Bay which are between 1.7 and 4 miles from the project, respectively. The water body has been designated as an impaired water body under Section 303d of the Clean Water Act (CWA). Total Daily Maximum Loads (TDMLs) have been established for mercury and are being developed for other contaminants.

The project is not located near the Pacific Ocean shoreline or within 100 feet of the San Francisco Bay shoreline or other navigable water body, and is therefore not located on land subject to the provisions of the Coastal Zone.

The greatest potential for adverse effects to water quality will be during construction, when soils are exposed and may be entrained in runoff, resulting in sediment in the combined sewer system as well as erosion within the study area. Implementation of a Storm Water Pollution Prevention
Plan (SWPPP) that identifies construction site BMPs required under the Construction General NPDES Permit will minimize potential effects of the Hybrid Alternative/LPA. During operation of the project, stormwater will continue to flow from impervious surfaces into existing catch basins, although some catch basins will be relocated to accommodate bus bulbs and other improvements, and additional catch basins will be constructed. To address operational effects on water quality, project landscaping will be incorporated into stormwater control. Although the use of fertilizers, herbicides, and pesticides on that landscaping has the potential to affect runoff quality, adherence to existing City policies and avoidance and minimization measures will lessen these potential effects. Stormwater runoff generated by the Hybrid Alternative/LPA will be required to be retained and treated on-site under existing City laws and policies.

Project Changes
The project changes to the Hybrid Alternative/LPA would be within the original project footprint or adjacent paved public property which is fully developed and would not have a greater potential to impair stormwater runoff. Therefore, the project changes would not result in new or more adverse effects on water quality, navigable waterways, or coastal zones.

Q. IMPACTS ON ECOLOGICALLY-SENSITIVE AREAS AND ENDANGERED SPECIES:
Describe any natural areas (woodlands, prairies, wetlands, rivers, lakes, streams, designated wildlife or waterfowl refuges, and geological formations) on or near the proposed project area. If present, state the results of consultation with a federal or state resources agency on the impacts to these natural areas and on threatened and endangered fauna and flora that may be affected.

- Will the project require permits or consultation from U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, etc.?
- Is the project near any designated biological or environmentally sensitive area (BSA, ESA), designated critical habitat, wildlife corridors, or essential fish habitat?
- Does the project require mature tree removal?
- Are there known threatened and endangered species occurrences in the area?
- Does the site support sensitive habitat, including nesting or foraging areas?

Approved Project
As described in the FEIS, the project area is fully urbanized with little or no indigenous vegetation. The project area does not contain any riparian habitats, wetlands, or other special habitats. Threatened, endangered, or other regulated or sensitive species and sensitive habitats are not known to occur within the project area. Therefore, provisions of the ESA and CESA are not applicable to this project. The project will not require permits or consultation from federal or state resources agency on the impacts to natural areas. The Hybrid Alternative/LPA includes planting of new trees, at least one tree replaced for each tree removed. Tree removal permits will be required for each tree that will be potentially impacted or removed that is protected.

Construction of the Hybrid Alternative/LPA will have a potential to directly affect:

- Trees protected under the Urban Forestry Ordinance;
- Birds, their nests, and eggs as protected under the MBTA; and
- Potential for introduction or increases in noxious weeds associated with ground disturbance activities, as considered under EO 13112.

With avoidance and minimization measures, no adverse effects will occur during construction.

The FEIS determined that operational activities associated with the Hybrid Alternative/LPA are not expected to result in increased disturbance to migratory birds or other biological resources in the Geary corridor. As such, no indirect or operational effects are anticipated.
Project Changes
The project changes would be within the original project footprint or adjacent paved public property that is fully developed and would not have a greater potential to effect ecologically sensitive areas or endangered species. Therefore, the project changes would not result in new or more adverse effects on ecologically-sensitive areas or endangered species.

R. IMPACTS ON SAFETY AND SECURITY: Describe the measures that would need to be taken to provide for the safe and secure operation of the project after its construction.

- Pedestrian Safety? ADA features? Lighting?
- Discuss safety impacts related to any railroad at-grade crossings in close proximity.

Approved Project
As described in the FEIS, the project will not result in adverse effects to pedestrian safety during construction. The FEIS includes the following improvement measure to reduce construction-related impacts to local businesses and residents:

CI-1: A Traffic Management Plan (TMP) that includes traffic rerouting, a detour plan, and public information procedures.

With implementation of CI-1, the project will not result in adverse effects to pedestrian and bicycle conditions along the corridor. Notwithstanding, the FEIS recommended improvement measure I-PED-1 through I-PED-2 to enhance overall project performance. Improvement measure I-PED-1 includes implementation of pedestrian safety measures where possible as part of the project design, while I-PED-2 includes Universal Design Principles to enhance access for disabled persons.

Project Changes
The project changes would generally improve conditions for pedestrians through the addition and extension of pedestrian bulbouts, bus bulbs in lieu of islands, and the combination of local and BRT stops at one location. In sum, the project changes would not result in new or more severe effects to pedestrian delay, sidewalk conditions, pedestrian safety, or access for seniors and persons with disabilities.

S. IMPACTS CAUSED BY CONSTRUCTION: Describe the construction plan and identify impacts due to construction noise, utility disruption, debris and spoil disposal, air and water quality, safety and security, and disruptions of traffic and access to property.

- Include temporary parking locations
- Mention construction staging areas.
- Traffic management plan?

Approved Project
As described in the FEIS, temporary conversion of parking lanes to mixed-flow travel lanes will be implemented during project construction, resulting in the temporary removal of on-street parking in areas throughout the Geary corridor while construction is taking place. Residents, businesses, and visitors along the Geary corridor will also be subject to noise, dust, vibration, and emissions from construction equipment during project construction. These impacts could discourage or restrict pedestrian activity along the blocks under construction and reduce foot traffic, which could effect local businesses.

During construction, air emissions will be temporarily generated from various sources, including construction equipment engines, truck engines, and earthwork activity. Dust control and clean construction practices will be required to control fugitive dust emissions and substantially reduce exhaust emissions associated with standard construction equipment.

Some construction-related activities have potential to result in noise disturbance and annoyance effects on nearby sensitive receptors. To this end, avoidance and minimization measures MIN-NOI-C1 through MIN-NOI-C5 from the FEIS shall be required to provide noise monitoring
throughout construction. Additionally, the implementation of additional sound-attenuating measures is necessary to address potential adverse effects.

To reduce the impact of construction on light glare, Avoidance and Minimization Measure MIN-VQ-C1 from the FEIS was identified and will reduce the severity of adverse construction-related impacts to visual quality. With the avoidance and minimization measures listed above, construction-period effects will not be adverse.

Construction staging areas will be required. These areas will need to be in proximity of the Geary corridor, ideally no more than 200 feet away. At this time the only area that has been identified for such use is within the street right-of-way. Candidate locations include parking areas and medians along the Geary corridor, and parking areas located on adjacent side streets. Construction staging areas will be screened by visually opaque screening wherever they will be exposed to public view for extended periods of time. It is anticipated that construction staging areas will move along the corridor in tandem with the shifting work zone.

Construction-related effects of the Hybrid Alternative/LPA will be avoided, minimized, and/or mitigated by adherence to a transportation management plan (TMP), as required by the Federal Highway Administration Work Zone Safety and Mobility Rule (23 CFR 630.1012), that includes traffic rerouting, a detour plan, and public outreach. The TMP will be developed during the design phase, with participation from local agencies, business associations, residents, and other stakeholders in the area. Early and well-publicized announcements and outreach will help to minimize confusion, inconvenience, and traffic congestion during construction phases. To address parking issues, construction-related temporary parking will be provided.

Project Changes
The intensity and duration of construction activities generated by the project changes are anticipated to decrease or generally remain unchanged in comparison to the FEIS. Overall, construction would be lessened as a result of shortening bus stops, while the addition of pedestrian bulbs and other pedestrian improvements would increase construction duration slightly. These changes would still be within the construction durations discussed in the FEIS. Therefore, project changes would not result in new or more adverse effects caused by construction.

SUPPORTING TECHNICAL STUDIES OR MEMORANDA: List any technical studies or memoranda prepared for the project.
• This may include documentation demonstrating compliance with environmental requirements other than NEPA, such as Section 4(f), Section 106 of the National Historic Preservation Act (“Section 106”), or Section 7 of the Endangered Species Act
• For projects in California, also list the environmental document prepared pursuant to the California Environmental Quality Act (CEQA). Attach the CEQA document.

Supporting technical studies or memoranda prepared for the FEIS include:
Transportation Study:
  Modeling Methodology
  Land Use Inputs
  CHAMP Validation
  DTA Validation
  VISSIM Calibration
  Transit and Traffic Operations
  Change in Vehicle Traffic Volumes
  Pedestrian Safety Analysis

Cultural Items:
  Architectural APE
  Archaeological APE
  SHPO Correspondence

Initial Site Assessment
Air Quality Conformity Task Force Concurrence, Air Quality and Greenhouse Gas Report
Noise and Vibration Report
Tree Survey Assessment and Species Lists

Supporting technical studies prepared for the project changes include:
Geary Corridor Bus Rapid Transit Project – Project Refinements Transportation Analysis Technical Memorandum

PUBLIC OUTREACH AND AGENCY COORDINATION: Describe any federal/state agency coordination, public outreach efforts, public meetings, or public hearing held or public notices posted for the project. Discuss if project information is posted on a project website.

On October 2, 2015, SFCTA distributed the Draft EIS/EIR in accordance with both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act, to applicable federal, state, and local agencies, elected officials, neighborhood groups, and other interested parties who had expressed interest in the proposed project and those who requested a copy of the Draft EIS/EIR. SFCTA invited comments to be submitted in writing via mail or email throughout the public comment period, or provided at the public comment meeting orally or in writing. A total of 299 comment communications (e.g., letters, emails, oral comment transcripts) were submitted and responses were included in the FEIS.

Since FTA issued the FEIS and approval of the project, the design of the project has advanced as a result of public outreach and feedback as well as additional detailed design for Phase I of the project. Outreach activities in the design phase have included public open houses; a merchant loading survey; a bus stop change survey; and general mailings, postings, meetings and presentations.

Two project websites have been created by SFMTA, one for Phase I (www.sfmta.com/Geary) and one for Phase II (www.sfmta.com/ImproveGeary). Both websites contain a variety of relevant reference documents.

On August 21, 2018, the SFMTA Board held a public hearing and acted to legislate the parking and traffic changes associated with Phase I of the project. Leading up this milestone, public notices were distributed via mail, email, and posted in the corridor and on the SFMTA’s website.