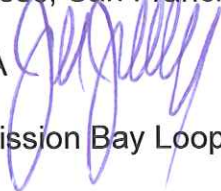




DATE: April 22, 2013  
TO: Dogpatch Area Residents and Businesses, San Francisco, CA  
FROM: John Haley, Director of Transit, SFMTA   
SUBJECT: Neighborhood Petition regarding the Mission Bay Loop

Thank you for taking the time to contact us and provide feedback on possible alternatives. The SFMTA Transit Division understands your concerns with the Mission Bay Loop project and agrees that the Dogpatch, Mission Bay, Pier 70 and areas all along the South East Waterfront are experiencing growth. This is one of the main reasons why additional transit service is needed.

#### *Mission Bay Loop at Proposed Location*

The 18th Street/Illinois/19th Street loop was selected in order to best serve the emerging communities and job centers in the Mission Bay and Dogpatch neighborhoods. The Environmental Assessment has been updated to include a list of alternative locations considered and rejected, please refer to that document for greater detail. The loop location is integral to the Central Subway service plan as it minimizes the distance T-line trains need to travel between downtown and the communities where transit demand is expected grow significantly in the next 10 years. The loop will allow SFMTA to provide frequent, fast, and convenient connections to you and your neighbors by operating the most efficient short line service that serves the largest section of passenger demand. For residents south of the loop location, the Central Subway augmented service will also increase transit frequency for the long-line by 20% through the Dogpatch area down to Sunnysdale.

#### *Why not use the Metro East Facility?*

Using the Muni Metro East (MME) yard presents operational challenges and will result in slower and more expensive daily service. The Muni Metro East yard was developed and built as a maintenance and storage facility and is not designed nor built to handle regular in-service train movements every 5-10 minutes. The yard does not include a revenue loop for speedy operations.

As a result, a train turnaround in and out of the yard is estimated to take approximately 10 minutes due to track configuration and switch technology and placement. When including the additional travel time between 19th Street and the yard of 4-5 minutes in each direction, the total travel time increase is approximately 20 minutes. With a planned frequency of approximately 7.5 minutes in 2018 when the Central Subway opens,

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Mayor

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Cheryl Brinkman  
Vice-Chairman

Leona Bridges  
Director

Malcolm Heinicke  
Director

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Director

Joél Ramos  
Director

Cristina Rubke  
Director

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extending the service to MME would require three additional trains in order to maintain the planned 7.5 minute service.

At a cost of an estimated \$5 million each, three two-car trains would require an investment of \$30 million in rail vehicles. The daily cost of operating and maintaining three additional trains would increase by an estimated \$3.7 million annually.

In addition, operating revenue trains in and out of MME every 5-10 minutes would limit our ability to store trains and utilize maintenance flexibility since track would need to remain consistently clear for revenue movements. To summarize, the additional capital costs upwards of \$30 million dollars and operational costs of nearly \$4 million annually, the current design/use of MME, and the cost/benefits of the Mission Bay Loop in the present location clearly indicate a superior operational and cost-effective location for train turn arounds.

#### *Impacts of the Current Proposal*

The Environmental Assessment deals with most of the petition's "Impact of Current Proposal" in detail. However, the SFMTA is aware of these concerns and will work the Port of San Francisco and the residents to ensure that circulation, access to Pier 70, congestion, noise/vibration and coordination with the Giants schedule are handled appropriately.

With regard to emergency response, the City and County of San Francisco along with the SFMTA, places the utmost priority on providing public safety citywide. We have not found that operating a surface light rail system on city streets has decreased response times and once the loop is operational, the Fire and Police Departments will update their response route options in this area ensure public safety and minimal response times.

Lastly, as noted in your petition, the traffic volumes from the 1997 counts serve as a baseline and were augmented with counts from the SF Planning Department in 2012 study (see page 27), the city's traffic model data, and field observations during January and February of 2013 to ensure that the latest information was used.

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

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June 27, 2013

Reply To: FTA\_2013\_0329\_001

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

Re: Request for Concurrence on APE, Eligibility of Historic Resources and Finding of No Adverse Effect, Mission Bay Transit Loop Project, City and County of San Francisco, CA

Dear Mr. Rogers:

Thank you for your letter of June 18, 2013 continuing consultation and providing additional information for the above referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. The Federal Transit Administration (FTA) is requesting that I review the proposed project and concur with the Area of Potential Effect (APE), that a historic district is eligible for listing in the National Register of Historic Places (NRHP), and with your determination of No Adverse Effect for the undertaking.

As I presently understand it, the undertaking consists of the construction and operation of a transit loop to provide turn-around capabilities for the T-Third Street light rail line via connection of the Mission Bay Transit Loop comprised of trackway on Third, Eighteenth, Nineteenth and Illinois Streets. The San Francisco Municipal Transit Agency (SFMTA) plans to begin construction of the Mission Bay Transit Loop as early as 2014. The Mission Bay Transit Loop will allow the SFMTA to increase transit service between Mission Bay, South of Market street neighborhoods, and Chinatown.

The existing track at Third Street/Eighteenth Street would be extended along Eighteenth Street to Illinois Street and then south on Illinois Street to Nineteenth Street to complete the loop. Approximately 900 feet of single-trackway with track drains connected to the existing combined sewer and storm system would be installed in the centerline of the existing right-of-way. Traffic, pedestrian and train signals at the intersections and sidewalk improvements along the loop would be installed. In order to install the new trackway along Illinois Street, a 534-foot section of abandoned freight tracks owned by Union Pacific Railroad will be removed. The direct fixation trackway would require excavation approximately 18 inches below grade, and catenary poles would be installed at a maximum depth of 10 feet.

An Environmental Impact Statement/Environmental Impact Report (EIS/EIR) was prepared for the Third Street Light Rail Project, of which the Mission Bay Transit Loop is a component, was completed and approved in 1999. A Programmatic Agreement among the Advisory Council on Historic Preservation, FTA, SFMTA, and this office was signed regarding effects from the Third Street Light Rail Project. While the Third Street Light Rail project was completed in 2003, the Mission Bay Transit Loop was not constructed due to budget constraints.

FTA has determined that the APE is 900 feet in length and includes the width of the street and sidewalk and street-light bulb-outs along one-third of the block of Eighteenth and Nineteenth Streets near the intersections with Illinois Street, and the width of the street along one full block of Illinois Street between Eighteenth and Nineteenth Streets, as shown in Figure 1 of the technical memo attached to your letter. The vertical APE extends to a maximum of ten feet below the surface for ground disturbance from the project work, including the installation of the proposed trolley poles/streetlights. I do not object to this APE.

Background research was performed to identify historic properties, which indicates that the APE is within the Central Waterfront Planning Area. The Potrero Point Historic District was identified in a previous survey prepared for the City of San Francisco identifying historic resources for the purposes of the California Environmental Quality Act (CEQA) and is not formally listed at the local or state level. The Pier 70 Historic District is adjacent to the APE on the west, and that nomination was submitted to my office for consideration for listing on the National Register on June 7, 2013. The locally designated Dogpatch Historic District is located two blocks to the east of the APE.

FTA has requested concurrence on the eligibility of the Pier 70 Historic District. Since this nomination is currently under review by my office for formal designation on the NRHP, I will assume it eligible for the purposes of this project only at this time and defer a formal determination of eligibility once the review of the pending National Register nomination is complete. Recognizing the need for expediency due to the potential loss of funding for the project, I will also assume the Potrero Point Historic District eligible for the purposes of this project only.

The Dogpatch Historic District is a locally designated historic district, the closest boundary of which is located two blocks east of the current project's APE. FTA requested a determination of eligibility but did not include it in the APE for the undertaking or identify any direct or indirect effects to this district. As such, it is beyond the scope of 36 CFR Part 800.4(a) and (b) and I am unable to comment on its eligibility at this time.

Previous studies did not identify any buried deposits of cultural resources within the APE, but historic archaeological materials related to the area's shipbuilding and ironworking history may be present. Results of a geotechnical investigation conducted in the APE indicated that the immediate vicinity of the proposed project location consists of Quaternary artificial fill and sand deposits, which may contain historic artifacts, but the likelihood of encountering pre-contact archaeological materials is low due to the artificial fill deposits and roadway modifications. I recommend that an archaeological monitor is retained to monitor all excavation activity for the project.

FTA has determined that there are no historic properties within the APE. However since the Potrero Point Historic District is assumed eligible for the purposes of the project, the undertaking would occur within the boundaries of that district. This is an industrial area, and the addition of catenary wires and other features would not alter the integrity of either the Potrero Point Historic District or the Pier 70 Historic District, which is immediately adjacent to the APE. The FTA has determined that the undertaking would have no adverse effect on historic properties. I concur with this determination.

In the event buried cultural resources are encountered during construction activities, FTA is obligated to halt construction and isolate and secure the area of the discovery until an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards can assess the nature and significance of the find, pursuant to 36 CFR Part 800.13(b). Also, per

36 CFR Part 800.13(b)(3), upon discovery of deposits which may constitute a site, the agency official shall notify the SHPO and any Indian tribe that might attach religious and cultural significance to the property. The notification shall describe the agency official's assessment of NRHP eligibility of the property and proposed actions to resolve the adverse effects (if any). The SHPO, Indian tribe, and Advisory Council on Historic Preservation (Council) shall respond within 48 hours of notification. The agency official shall take into account their recommendations regarding NRHP eligibility and proposed actions, and then carry out appropriate actions. The agency official shall provide the SHPO, Indian tribe, and the Council a report of the actions when they are completed.

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

Sincerely,

A handwritten signature in black ink that reads "Carol Roland-Nawi, Ph.D." The signature is written in a cursive, flowing style.

Carol Roland-Nawi, PhD  
State Historic Preservation Officer