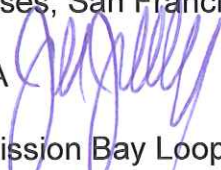




DATE: April 22, 2013
TO: Dogpatch Area Residents and Businesses, San Francisco, CA
FROM: John Haley, Director of Transit, SFMTA 
SUBJECT: Neighborhood Petition regarding the Mission Bay Loop

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,

Edwin M. Lee
Mayor

Tom Nolan
Chairman

Cheryl Brinkman
Vice-Chairman

Leona Bridges
Director

Malcolm Heinicke
Director

Jerry Lee
Director

Joél Ramos
Director

Cristina Rubke
Director

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Transportation

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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.



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

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San Francisco, CA 94105-1839
415-744-3133
415-744-2726 (fax)

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

JUN 18 2013

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

Dear Ms. Roland-Nawi:

The Federal Transit Administration (FTA) has reviewed your letter, dated May 20, 2013, requesting clarifications to FTA's March 27, 2013 letter. This letter provides updates and clarifications and makes a renewed request for concurrence from the California State Historic Preservation Office (SHPO) for the determination of the area of potential effects (APE), eligibility of historic resources for the National Register of Historic Places (NRHP), and determination of no adverse effects to historic resources for the proposed Mission Bay Transit Loop Project in the City of San Francisco, pursuant to Section 106 of the National Historic Preservation Act (NHPA) (36 CFR 800).

Pursuant to 36 CFR Part 800.3(g), FTA is requesting an expedited review of the request for concurrence as the project is in jeopardy of losing funding through a discretionary grant under the TIGER Cycle IV program. The funds may lapse on June 30, 2013 if not awarded.

Project Description

The proposed project consists of the construction and operation of a transit loop to provide turn-around capabilities for the T-Third Street light rail line via a connection of trackway from Third Street to Eighteenth, Illinois, and Nineteenth Streets in the City of San Francisco. Roughly 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 right-of way. Traffic, pedestrian, and train signals at the intersections and sidewalk improvements along the loop.

Seventeen trolley poles would be installed; streetlights would be affixed to eight of these poles. There would be 2 poles on each side of Eighteenth Street, 2 poles on each side of Nineteenth

Street, 7 poles on the west side of Illinois Street, and 6 poles on the east side of Illinois Street. All proposed poles would be installed 18 inches from the curb edge. Six bulb-outs would be installed to accommodate the poles on the east side of Illinois Street. The bulb-outs would extend into Illinois Street approximately 18 inches in order to provide the necessary positioning required for power connection. Poles would measure between 10 and 12 inches in diameter and have 3-foot diameter caisson foundations at a maximum depth of 10 feet. The streetlights would be standard “cobra-head” streetlight fixtures.

Area of Potential Effects

Under 36 CFR Part 800.16(d), the APE is defined as the geographic area in which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The proposed APE for archaeological resources is limited to areas that could be affected by the maximum extent of project-related ground disturbance. The types of ground disturbance activities include the following: construction of new tracks, new stations, and trolley poles/streetlights; grading, and other construction activities. The APE for the proposed project is 900 feet in length and includes the width of the street and sidewalk, the street-light bulb-outs along one-third of the block of Eighteenth and Nineteenth Streets near their intersection with Illinois Street, and the width of the street along one full block of Illinois Street between Eighteenth and Nineteenth Streets (as shown in Attachment 1 of this letter).

In the May 20, 2013 letter, SHPO recommended that the vertical APE to be expanded to include the depth of ground disturbance from the installation of the streetlights. Your office also requested clarification regarding the location of the proposed streetlights in relationship to the APE. The vertical APE extends to a maximum depth of 10 feet below the surface. The vertical APE encompasses the anticipated depth of ground disturbance from the project work, including the installation of the proposed trolley poles/streetlights. Attachment 1 presents an aerial photograph with location of the proposed trolley poles or combination trolley pole/streetlights.

Survey Results

Your office requested additional information regarding the eligibility of the resources located in and adjacent to the APE. There are no historic properties located in the APE. FTA reviewed resources and historic districts that are adjacent to the APE to analyze potential indirect effects. The research indicated that two historic districts, Pier 70 and Dogpatch Historic Districts, are located adjacent to the APE. The project is located within the boundaries of the Potrero Point Historic District. Although there have been studies regarding the districts, these districts are not currently listed on the NRHP and have not undergone formal determinations of eligibility for the NRHP by any previous Section 106 consultation. The following discussion summarizes the determinations of eligibility for each district. The eligibility determinations for each historic district are also shown in Table 1.

In 2000 and updated in 2008, the San Francisco Planning Department conducted its Citywide Cultural Resource Survey program by surveying more than 140 resources built before 1956 in the Central Waterfront area. From these studies, resources were evaluated as to its potential eligibility for inclusion in the NRHP. According to the Department of Parks and Recreation (DPR) form prepared as part of the 2008 survey, Pier 70 is a district eligible for listing on the NRHP under Criterion A and C, Dogpatch was designated as a local district by the City of San

San Francisco Board of Supervisors, and the Potrero Point Historic District is considered eligible as a local district (SF Planning Dept., 2008). The DPR form for the Potrero Point Historic District was included as Appendix B in the Cultural Resources Technical Memorandum, submitted to the SHPO on March 27, 2013.

The APE is adjacent to the Pier 70, formerly known as Union Iron Works. In 2011, the Port of San Francisco drafted a National Park Service nomination form to list Pier 70 as a historic district on the NRHP. According to Kathleen Diohep of the Port of San Francisco, the nomination was submitted to the SHPO for review the week of June 7th, 2013. Pier 70 is eligible for the NRHP under Criterion A for its association with the development of the maritime industry. The district is also eligible for the NRHP under Criterion C as an example of industrial architecture from the late nineteenth century to World War II. The draft nomination form may be found in Appendix C of the Cultural Resources Technical Memorandum.

The Dogpatch Historic District is two blocks from the APE. It was designated as a local historic district by the City of San Francisco in 2003. The district, concentrated mostly along Tennessee and Minnesota Streets between Tubbs and 18th Streets, is comprised of almost one hundred flats and cottages, as well as several commercial, industrial, and civic buildings, most of which were erected between 1870 and 1930. Dogpatch was not recommended as eligible for the NRHP in the Central Waterfront Cultural Resources Study of 2001 and in the DPR form prepared for the City of San Francisco in 2008. Numerous resources have been altered to the degree that they no longer retain sufficient integrity of design, materials, workmanship, setting, location, feeling, and association to be eligible for the NRHP as contributing resources to a historic district. FTA agrees with the recommendation in the Central Waterfront Study and in the DPR that the district is only eligible at a local level and requests that SHPO concur with its determination that Dogpatch is not eligible for the NRHP.

The APE is within the Potrero Point Historic District; Potrero Point consists of a number of manufacturing, repair, and processing plants constructed during the first half of the twentieth century along Third and Illinois Streets between Eighteenth and Twenty-Fourth Streets. In the DPR form prepared for the City of San Francisco in 2008, Potrero Point was assigned a status code of 5S3 recommending that the district is eligible for the California Register of Historical Resources (CRHR) under Criterion 1 for its association with the industrial development of the City of San Francisco from 1872 to 1958. The district was also recommended as eligible for listing in the CRHR under Criterion 3 as many of the buildings in the district are good examples of late-19th and early 20th century industrial design. Although not formally stated in the DPR form, in accordance with the Instructions for Recording Historical Resources from the CA SHPO, a resource assigned a status code of 5S3 is not recommended as eligible for the NRHP. Building, Structure, and Object Records prepared for the Central Waterfront Cultural Resources Survey in 2001 for the contributing resources to the Potrero Point Historic District indicate that as a result of the loss of integrity from alterations to many of the buildings in the district, it is not eligible for the NRHP. FTA agrees with the recommendation in the DPR that the Potrero Point Historic District is eligible for the CRHR as a local district but not the NRHP and requests that SHPO concur with its determination that Potrero Point is not eligible for the NRHP.

Table 1. Eligibility for the NRHP of Historic Districts Adjacent to the APE

District	Study Name/Date	Study Recommendation	NRHP Eligibility Determination
Pier 70	Port of San Francisco National Register Nomination 2011 DPR District Record Potrero Point Historic District 2008	Eligible for the NRHP under Criteria A and C	Eligible for the NRHP under Criteria A & C
Dogpatch	San Francisco Central Waterfront Cultural Resources Survey 2001 DPR District Record Potrero Point Historic District 2008	Not eligible for the NRHP/Locally designated	Not eligible for the NRHP
Potrero Point	San Francisco Central Waterfront Cultural Resources Survey 2001 DPR District Record Potrero Point Historic District 2008	Not eligible for the NRHP/ Eligible for the CRHR under Criteria 1 & 3	Not eligible for the NRHP

Evaluation of Effects

There are no historic properties within the APE. Of the three historic districts, only the Pier 70 Historic District was determined to be eligible for the NRHP. Construction of the proposed project would not affect the adjacent Pier 70 Historic District. Noise, dust, and other effects from construction would be temporary and would not result in an adverse effect to historic properties. The contributing resources to Pier 70 Historic District are located outside of the APE; therefore, there would be no effect to these resources from construction or operation of the project. The addition of catenary wires and other features of the project would not alter the integrity of the district by changing the location, setting, feeling, workmanship, materials, and association or other characteristics of the property that make it eligible for inclusion in the NRHP. The new features would be compatible with the existing setting of tracks and overhead wires, and would not be an adverse effect.

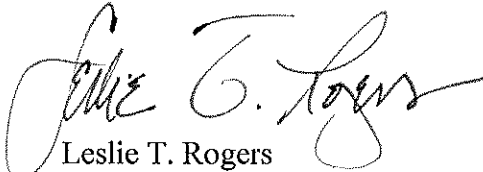
Request for Concurrence

In accordance with 36 CFR § 800.4, the FTA is requesting your concurrence with the APE. FTA is also requesting concurrence on the determinations that the Pier 70 Historic District is eligible for the NRHP and that the Dogpatch and Potrero Point Historic Districts are not eligible for the NRHP. In accordance with 36 CFR § 800.5, FTA also requests your concurrence with a finding of no adverse effect on historic properties for this undertaking.

Pursuant to 36 CFR Part 800.3(c)(4), if we have not heard from your office within 30 days, we will contact your office to address any comments you may have.

If you have any questions, feel free to contact Mr. Alex Smith, Community Planner at (415) 744-2599.

Sincerely,



Leslie T. Rogers
Regional Administrator

Attachment: Figure 1 Aerial photograph showing the APE and proposed locations of the trolley poles

Attachment 1: Aerial photograph showing the Project APE and locations of the proposed trolley poles

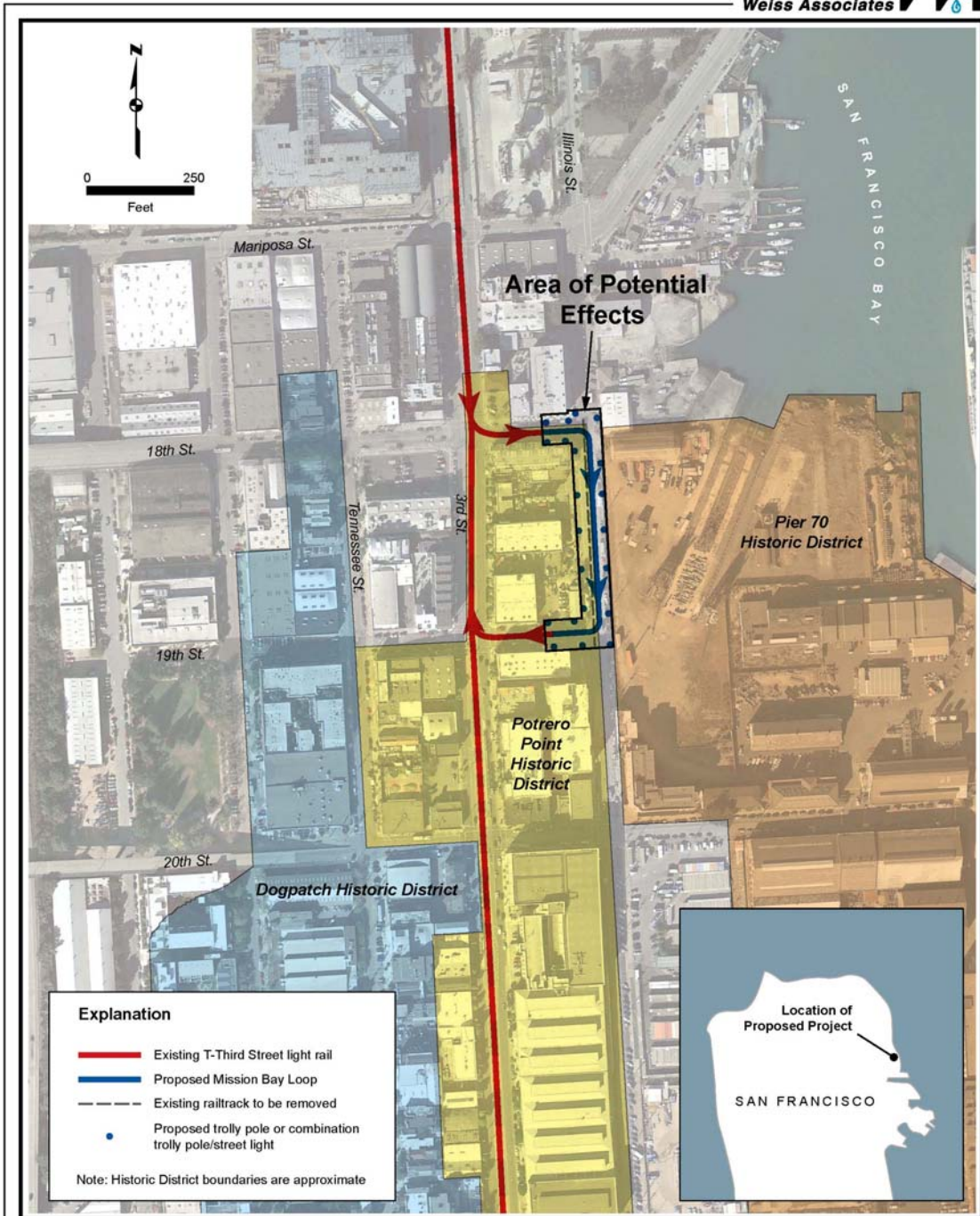


Figure 1. Aerial photograph showing the Project APE and locations of the proposed trolley poles

**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.

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