David Pilpel
2151 27th Ave
San Francisco CA 94116-1730

Angela Calvillo, Clerk of the Board
Board of Supervisors
1 Carlton B Goodlett Pl Ste 244
San Francisco CA 94102-4689

June 30, 2017

Re: File No. 170718, California Environmental Quality Act (CEQA) Appeal

Dear Ms. Calvillo,

I write to more fully brief the issues referenced in my June 1, 2017 appeal letter. As an initial matter, however, as the Appellant I join with the Respondent Planning Department and the Municipal Transportation Agency (MTA), the Project Sponsor / Real Party in Interest, to ask the Board not to hear the appeal on July 11, 2017 but instead to continue the hearing and related items on that date to September 5, 2017 to allow the parties more time for continued discussion about how to move forward and possibly resolve the appeal without the Board needing to hear it.

As I stated in my June 1, 2017 letter, my concerns about this exemption determination include the project description, whether the entire project needed to be re-submitted for environmental review based on changes to the project description and scope, piecemealing, and whether either (or both) of the exceptions (cumulative impacts or unusual circumstances) to an exemption apply here (particularly transportation and emergency access).

1. Regarding the project description, the MTA Board agenda described the item as "Approving various bicycle and parking and traffic modifications associated with the Upper Market Street Safety Project as follows" and listed 19 separate elements, 18 of which were approved by the MTA Board on May 2, 2017. The Staff Report, at pages 3 to 5, described 5 types of pedestrian safety improvements and 8 types of bicycle safety improvements. The Exemption Determination includes an October 6, 2016 memorandum from MTA to the Planning Department, which, at pages 2 to 5, describes the Project with at least 63 elements. It is difficult to nearly impossible to reconcile the various ways the Project is described to understand both its components and whether the Project elements approved by the MTA Board were included and within the scope of the project analyzed by the Planning Department and determined to be exempt from CEQA. A more clear, definite, and stable project description is needed here.

2. As to whether the entire project needed to be re-submitted for environmental review based on changes to the project description and scope, the October 6, 2016 memorandum discussed above presumably described the Project as it was conceived and designed at that time. The Planning Department made the categorical exemption determination on February 3, 2017, presumably based on the October 6, 2016 memorandum. Meanwhile, the Staff Report notes, at page 8, that Open House events were held on May 5 and 13, 2016 and April 1 and 5, 2017. The

Staff Report also notes that an Engineering Public Hearing was held on March 3, 2017. Next, the Staff Report notes that field visits were held with the Fire Department on August 19, 2016; February 3, 2017; and March 20, 2017. Finally, the Staff Report notes, at pages 9 and 10, that changes were made to the Project following each of the field visits. What is not clear is what version of the Project (presumably the October 6, 2016 version?) was reviewed by the Planning Department under CEQA. Especially given the various elements of project description discussed above, the final version of the Project should have been submitted or re-submitted to the Planning Department for environmental review, covering all of the design and scope changes made following the field visits, open houses, public hearing, and any other changes.

3. Regarding piecemealing, while MTA staff decided to pull the Sanchez and Octavia Street bikeway elements (item 13.A) from consideration at the May 2, 2017 MTA Board meeting and handle them separately at a later date, following concern that I expressed to MTA staff on May 1, 2017, the Staff Report includes those elements as part of the Project. While MTA staff may argue that these elements have "independent utility," I don't think that you can have it both ways; either they are elements integral to the Project, without independent utility, or they are severable, and thus with independent utility, not both. Which is it? Meanwhile, these elements were heard at an Engineering Public Hearing on June 2, 2017 and are likely headed for approval at a future MTA Board meeting. I strongly urge that they be re-combined with the other Project elements and re-evaluated for environmental review as discussed above. Disjointed review and approval of such elements results in piecemealing and ignores possible cumulative impacts.

4. As to whether either (or both) of the exceptions (cumulative impacts or unusual circumstances) to an exemption apply here (particularly transportation and emergency access), there is no discussion in either the Planning Department's Exemption Determination or the MTA's October 6, 2016 memorandum about the possibility of either exception applying, or other past, current, and reasonably foreseeable projects in the area that might contribute to cumulative impacts. For example, MTA had been preparing for the Twin Peaks Tunnel Improvement Project, to replace worn out tracks and make other improvements in that 99-year old tunnel, with construction staging near Castro and Market Streets. While that project has now been delayed, probably for about a year, its construction impacts should be considered here for cumulative impacts analysis purposes. Other projects, private and public, should also be considered. A summary statement that such projects were considered and determined not to create cumulative impacts should be included in an Exemption Determination if appropriate.

5. Regarding unusual circumstances, the idea that the Fire Department's expressed concern that parking protected bicycle lanes under Muni overhead wires substantially impairs emergency access, firefighting operations, and ultimately public safety was discounted or ignored here is troubling at best. While MTA apparently communicated extensively with the Fire Department and modified the Project several times to address some of the Fire Department's concerns, the Planning Department had an independent obligation to review the Project's environmental impacts, including emergency access and public safety, and to the extent that the Planning Department lacks subject matter expertise on Fire Department issues, the Planning Department should have consulted directly with the Fire Department on those issues, not just take the MTA's representations that design details would be "worked out" or something later. In fact, the October 6, 2016 memorandum from MTA to the Planning Department, at page 6,

simply asserts that "This project will not prohibit emergency access to any streets in the project area." Even if true, that statement is not nearly the end of the story and obfuscates the real objections by the Fire Department to certain design elements of the Project. An April 18, 2017 email from the Fire Department to MTA staff, attached hereto, succinctly states its conclusions.

6. Although I choose not to dwell on the discussion of Vehicles Miles Traveled (VMT) right now, the October 6, 2016 memorandum, at page 5, states that "The proposed Bicycling and Walking Safety Improvement Project and Reconfiguration of Traffic Lanes are considered Active Transportation and Other Minor Transportation Projects in accordance with the Planning Department's Eligibility Checklist: CEQA Section 21099 - Modernization of Transportation Analysis, and is therefore presumed to not significantly impact VMT and no further VMT analysis is required." I have not seen the referenced Section 21099 checklist and do not know at this time how it plays into the discussion and analysis of transportation impacts. In any event, the quoted statement was MTA's assertion, which the Planning Department responded to in summary on the Exemption Determination, at page 2, by stating that "The proposed project would not include the removal of any existing travel lanes and would include transportation right-sizing elements designed to improve safety for all modes." The Exemption Determination does not document or elaborate as to how that conclusion was reached.

7. In general, I believe that the quality and quantity of documentation for Environmental Impact Reports and Negative Declarations issued by the Planning Department is about right. I also believe that most exemption determinations for private projects have adequate writeups. Further, I believe that small public projects generally do not warrant extensive documentation to support an exemption determination. However, I think that more care and effort should be given to document certain exemption determinations for public projects that are controversial, involve a large area or corridor of more than a few blocks, or have more potential to result in significant environmental effects due to cumulative impacts or unusual circumstances. Such projects are likely still eligible and appropriate for exemptions from CEQA; I just think that slightly more text in an exemption determination certificate would better document the Planning Department review process, any interdepartmental consultation, and the justification for an exemption based on substantial evidence in the Planning Department's records. For example, attached hereto is the Exemption Determination Certificate, prepared by the Planning Department, for the MTA 13th Street Eastbound Bicycle Facility Project, Case No. 2017-001180ENV, which was before the Board of Supervisors on appeal recently. While I take no position on that appeal or its underlying project, I note the superior approach of a certificate with text compared to a checklist.

8. Although the Planning Department may assert that in order to reverse an exemption determination, the Appellant must provide substantial evidence or expert opinion to refute the conclusions of the Planning Department, San Francisco Administrative Code section 31.16 (e) (5) provides, in relevant part, that "The Board shall reverse the exemption determination if it finds that the project does not conform to the requirements set forth in CEQA for an exemption." I believe that means that the burden is on the Planning Department to justify or support the exemption, not on the Appellant to show otherwise.

9. Finally, I note that Charter sections 8A.102 (b) (7) (i) and (b) (8) (i) provide that "the Board of Supervisors may by ordinance establish procedures by which the public may seek

Board of Supervisors review of" certain MTA decisions, which the Board has not done, and which I strongly urge the Board to do. Many controversial decisions of the MTA Board cannot now be appealed to the Board of Supervisors on substantive grounds, leaving only CEQA appeals as a poor and often ill-suited option for any kind of review.

In conclusion, I believe that the Project here does not conform to the requirements set forth in CEQA for an exemption, and that the Board should therefore reverse the exemption determination and remand it to the Planning Department for further action. If the Board agrees, appropriate findings would incorporate points raised here and in discussion at the Board.

Please contact me at 415 977-5578 with any questions.

Sincerely,

David Pilpel

Attachments:
Fire Department April 18, 2017 email to MTA staff
DCP Case No. 2017-001180ENV MTA 13th St Eastbound Bicycle Facility Project Exemption

cc: Devyani Jain, Acting Deputy Environmental Review Officer, Planning Department

From: Scanlon, Olivia (FIR)
Sent: Tuesday, April 18, 2017 1:52 PM
To: 'Maguire, Tom'; Sallaberry, Mike; Golier, Patrick; Montoya, Luis; 'Hildreth, Casey'
Cc: Barnes, Bill (ADM); Gonzales, Mark (FIR); DeCossio, Dan (FIR); Rivera, Anthony (FIR); Balmy, Alec (FIR); Gracia, Daniel (FIR)
Subject: Report on Impact of Proposed Plans by SFMTA for Upper Market Street

Good afternoon,
Please see the findings below regarding Market Street proposal.

Regards,
Olivia

Olivia Scanlon
San Francisco Fire Department
698 2nd Street
San Francisco, CA 94107

The Bureau of Fire Prevention, Support Services and Suppression have reviewed MTA's proposed protected bicycle lanes on Upper Market and Herman streets.

The review was a parallel path of both drawing review and on site physical inspection. The Bureau of Fire Prevention has concluded that MTA's Upper Market design materially compromises the safety of firefighters and local residents for the following reasons:

1) Herman Street:
* Diagonal parking scheme reduces the clear width to 15 feet resulting in insufficient clearance to deploy Aerial Ladder

2) Upper Market:
* Protected Bike Lane shifts car parking stalls which in turn further displaces aerial truck staging (38 feet out from the building versus prescribed 15-30 feet) creating an unsafe climbing angle for firefighters.

3) Upper Market:
* Protected Bike Lane shifts parked car stalls forcing the aerial truck to stage under Muni overhead wires creating an electric shock hazard for firefighters.

In addition, the SFFD has requested SFMTA to provide drawings using approved fire vehicle turn templates at the corner of Market/15th St/ Sanchez. This is a frequently traveled street just down from Sta 06. Fire must confirm that the proposed corner bulb-out and bicycle/vehicle parking at 15th St./Sanchez doesn't compromise Fire access.

Given compromised safety standards as detailed above, it is the recommendation of the Bureau of Fire Prevention to decline the expansion of protected bike lanes as currently outlined in MTA's proposal. The Bureau of Fire Prevention encourages MTA to identify alternatives that will address outlined safety standard issues, and welcomes further engagement on same.

SAN FRANCISCO
PLANNING DEPARTMENT

Certificate of Determination
Exemption from Environmental Review

1650 Mission St.
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San Francisco,
CA 94103-2479

Reception:
415.558.6378

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415.558.6409

Planning
Information:
415.558.6377

Case No.:	2017-001180ENV
Project Title:	**SFMTA – 13th Street Eastbound Bicycle Facility Project**
Location:	13th Street between South Van Ness Avenue and Bryant Street
Project Sponsor:	Jennifer Wong, SFMTA – (415) 701-4551
Staff Contact:	Christopher Espiritu – (415) 575-9022 Christopher.Espiritu@sfgov.org

PROJECT DESCRIPTION:

The San Francisco Municipal Transportation Agency (SFMTA) proposes the 13th Street Eastbound Bicycle Facility Project (proposed project). The proposed project would include the installation of a new bicycle facility on eastbound 13th Street, between South Van Ness Avenue and Bryant Street. Currently, there are no existing bicycle facilities along eastbound 13th Street; the westbound direction of 13th Street between Folsom Street and Bryant Street has an existing Class IV bikeway (parking-protected bike lane).

The proposed project would generally remove one travel lane along eastbound 13th Street to accommodate the proposed bicycle lane. The proposed project would also relocate and remove existing on-street parking, restripe portions of the street (i.e., lane marking changes), change the color of curbs, install signs within the project limits, and install painted bicycle boxes at the intersections of Folsom Street/13th Street, Harrison Street/13th Street, and Bryant Street/13th Street.

No excavation is required. Project construction, which includes painting and sign installation, is anticipated to last approximately 60 days. A subsequent phase which includes similar construction activities is anticipated to last approximately 30 days. The proposed project is intended to help meet the City's adopted Vision Zero policy which seeks to eliminate all traffic-related fatalities by 2024. The proposed project is also intended to fulfill Mayor Ed Lee's Executive Directive on Pedestrian and Bicycle Safety issued on August 4, 2016, as it relates to safety improvements on 13th Street. (Continued on page 2)

EXEMPT STATUS:

Categorical Exemption, Class 1 (California Environmental Quality Act [CEQA] Guidelines Section 15301) and Categorical Exemption, Class 4 (CEQA Guidelines Section 15304)

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and local requirements.

for _____ April 10, 2017

Lisa M. Gibson
Acting Environmental Review Officer

Date

cc: Jennifer Wong, SFMTA
Andrea Contreras, SFMTA
Virna Byrd, M.D.F.
Supervisor Kim, District 5 (via Clerk of the Board)
Supervisor Ronen, District 9 (via Clerk of the Board)

PROJECT DESCRIPTION (continued):

The objective of the proposed project is to improve safety conditions along 13th Street for bicyclists, pedestrians, and vehicles. The 13th Street corridor is on San Francisco's High Injury Network for vehicles and bicycles, a network of streets that experience a disproportionate number of bicycle collisions compared to other streets.[1]

Within the project limits of South Van Ness Avenue and Bryant Street, 13th Street is a two-way street with a width of 120 feet, including 16-foot-wide sidewalks on both sides of the street. As shown in Figure 1 (Existing Conditions), the existing configuration of westbound 13th Street consists of: a 6-foot-wide bicycle lane, a 6-foot-wide painted buffer, an 8-foot-wide parking lane, two 10-foot-wide travel lanes, and an 8-foot-wide concrete median. The existing roadway configuration of eastbound 13th Street includes: two 10-foot-wide and one 12-foot-wide mixed-flow travel lanes, as well as an 8-foot-wide curbside parking lane.

The proposed project would not involve any changes to the existing westbound lanes along 13th Street. The proposed project would include changes to the eastbound lanes along 13th Street. Between Harrison Street and Bryant Street, the proposed project would include two phases.

The proposed project would maintain the width of the existing 120-foot-wide roadway, including the locations of the existing curbs (i.e., sidewalk widths). However, the proposed project would restripe the 13th Street roadway between South Van Ness Avenue and Bryant Street and remove an existing travel lane. As shown on Figure 2 (Proposed Conditions), on the segment between South Van Ness Avenue and Folsom Street, the project would result in a typical mid-block eastbound cross-section of (parentheses indicate change to existing conditions): two 10 ½-foot-wide mixed-flow travel lanes (a ½-foot increase in width each), a 9-foot-wide painted buffer (new), and a 10-foot-wide right turn pocket (new).

On the segment between Folsom Street and Harrison Street, the proposed project would result in a typical mid-block eastbound cross-section of (parentheses indicate change to existing conditions): two 10-foot-wide mixed-flow travel lanes (no change in width), a 2-foot-wide painted buffer (new), a 6-foot-wide bicycle lane (new), a 2-foot-wide painted buffer (new), and a 10-foot-wide right turn pocket (new). Figure 2 shows the proposed configuration on this segment of 13th Street.

In Phase I, on the segment between Harrison Street and Bryant Street, the proposed project would result in a mid-block eastbound cross-section of (parentheses indicate change to existing conditions): a 10-foot-wide left turn lane (new), a 10-foot-wide mixed-flow travel lane (no change in width), an 8-foot-wide parking lane (relocated), a 5-foot-wide painted buffer (new), and a 7-foot-wide bicycle lane (new).

[1] Memorandum - *Environmental Clearance for the 13th Street Eastbound Bicycle Facility Project* (February 17, 2017) from Jennifer Wong (SFMTA) to Christopher Espiritu (Environmental Planning - San Francisco Planning Department). This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Case File No. 2017-001180ENV.

In Phase II, on the segment between Harrison Street and Bryant Street, the proposed project would result in a mid-block eastbound cross-section of (parentheses indicate change to Phase I conditions): two 10-foot-wide left turn lanes (no change in width), a 10-foot-wide mixed-flow travel lane (no change in width), and a 20-foot-wide through/right travel lane (new). The proposed Phase I and II conditions, between Harrison and Bryant streets, are shown in Figure 3.

As shown in Figures 4A and 4B (Striping Plans), the proposed project would include the removal of on-street parking (approximately 35 spaces) on 13th Street. The proposed project would not relocate or remove any existing commercial vehicle loading zones (yellow zones) or accessible parking spaces (blue zones) throughout the project limits.

Project Approvals

The proposed project is subject to internal review by SFMTA staff, a recommendation for approval by Transportation Advisory Staff Committee, Public Hearing with an SFMTA Hearing Officer, and finally approval by SFMTA Board. The proposed project is subject to notification through a Public Notice of Intent. If no objections are received to the Notice or the Public Hearing, the proposed project would be routed to the SFMTA Board of Directors for approval.

Approval Action: The Approval Action for the proposed project would be approval by the SFMTA Board of Directors, which approves the proposed roadway improvements to be implemented or constructed on the public right-of-way. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

EXEMPT STATUS (continued):

CEQA Guidelines Section 15301(c) or Class 1(c), provides an exemption from environmental review for minor alterations to "existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purposes of public safety)." This includes traffic channelization measures, minor restriping of streets (i.e., turn lane movements, painted buffers, and parking changes), and other improvements on existing streets. As described above, the proposed project includes these measures; therefore, the proposed project would be exempt from CEQA under Class 1(c).

In addition, CEQA State Guidelines Section 15304, or Class 4, provides an exemption from environmental review for minor public or private alterations in the condition of land. Class 4(h) specifically provides an exemption from environmental review for the creation of bicycle lanes on existing rights-of-way. The proposed project would include the installation of a new Class II and Class IV bicycle lane along eastbound 13th Street, between South Van Ness Avenue and Bryant Street. Therefore, the proposed project would also be exempt from CEQA under Class 4(h).

DISCUSSION OF ENVIRONMENTAL ISSUES:

CEQA Guidelines Section 15300.2 establishes exceptions to the application of a categorical exemption for a project. None of the established exceptions applies to the proposed project.

Guidelines Section 15300.2, subdivision (b), provides that a categorical exemption shall not be used where the cumulative impact of successive projects of the same type in the same place, over time, is significant. As discussed below under "Transportation" and "Air Quality" there is no possibility of a significant cumulative effect on the environment due to the proposed project.

Guidelines Section 15300.2, subdivision (c), provides that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. As discussed below, there is no possibility of a significant effect on the environment due to unusual circumstances.

TRANSPORTATION

The proposed project was analyzed in a memorandum prepared by the SFMTA and reviewed by the Planning Department for transportation impacts in the study area.[2] The following relies on the analysis conducted in that memorandum, as well as additional supplemental analysis.

Transit Impacts

The proposed project is a transportation project and the project is not anticipated to induce growth that would generate new trips, including transit trips, unlike a land use development project. In addition, the proposed project would not change transit service (e.g., decrease service, such that capacity may increase). Thus, a transit capacity utilization analysis is not necessary in considering CEQA impacts. However, transit travel time may change due to project-related traffic congestion delay. As traffic congestion increases in the area, traffic delays could result in delays to transit while traveling along the transit route corridor if the transit vehicles share right-of-way with other vehicles (i.e., mixed-flow lanes).

The proposed project would include roadway modifications along eastbound 13th Street, between South Van Ness Avenue and Bryant Street, where no existing Muni bus routes operate. However, there are nearby bus routes (12-Folsom, 27-Bryant, 9-San Bruno) which operate along the intersecting streets of Folsom Street, Bryant Street, and Division Street. The proposed modifications along the 13th Street eastbound roadway would not affect existing bus stops for the abovementioned bus routes. While there are existing bus stops for Muni bus routes 12 (Folsom), 27 (Bryant), and 9 (San Bruno) within the project vicinity, the proposed project would not remove (or relocate) any existing bus stops for these bus routes.

The impact on transit travel times was assessed by comparing projected project effects on vehicle capacity along roadway segments where private vehicles and transit operate in mixed-flow travel lanes. The

[2] SFMTA Memorandum to Planning Department – 13th Street Eastbound Bicycle Facility Project, February 17, 2017. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2017-001180ENV.

analysis was based on quantitative estimates of average vehicle capacity at intersections within the study area where the highest estimated number of vehicles were observed during the PM Peak hour. This approach was used to assess whether the proposed project could substantially reduce capacity and thereby affect transit vehicles traveling through the study area.

Using Highway Capacity Manual assumptions, eastbound 13th Street has an estimated capacity of 1,900 vehicles per hour per lane. The existing eastbound 13th Street roadway, between South Van Ness Avenue and Bryant Street, consists of three travel lanes which was estimated to have vehicle capacity in one direction with 5,700 vehicles per hour. SFMTA analyzed the most recent traffic counts available for intersections within the project limits, as shown in Table 1 below.

Table 1 – Traffic Volumes (PM Peak)

Intersection	Traffic Control	Traffic Volumes (EB Direction)		
		Existing	Traffic Volume Growth	Cumulative 2040
13th and Folsom (2015)	Signal	705 vehicles	+ 106 vehicles	811 vehicles
13th and Harrison (2015)	Signal	670 vehicles	+ 101 vehicles	771 vehicles
11th/13th/Bryant/Division (2015)	Signal	1,012 vehicles	+ 152 vehicles	1,164 vehicles

Notes: - Existing Roadway Capacity = 5,700 vehicles per hour; Proposed Roadway Capacity = 3,800 vph
- Traffic volume growth was derived using a 15% average growth rate over a 20-year period of traffic in the area
Source: SFMTA - 13th Street Traffic Count Data, Andrea Contreras (SFMTA) to Christopher Espiritu (SF Planning), February 2017

With implementation of the proposed project, roadway capacity in the eastbound direction would be reduced to approximately 3,800 vehicles per hour. As observed by SFMTA on April 2016, the existing traffic volumes on each project intersection of 13th/Folsom (705 vehicles), 13th/Harrison (670 vehicles), and 13th/Bryant Streets (1,012 vehicles) traveling within the project limits would be accommodated by the roadway capacity (3,800 vehicles per hour) under the proposed roadway configuration.

In order to assess cumulative effects of the proposed project, SFMTA staff used the average growth in the study area's traffic volumes to ascertain the projected growth in vehicle traffic volumes. This growth was found to be approximately 15 percent. Staff then applied a 15 percent increase to all intersection-level directional vehicle volumes in the Existing Conditions to generate the 2040 Baseline Conditions traffic volumes.

As shown in Table 1 above, cumulative traffic volumes on each project intersection of 13th/Folsom (811 vehicles), 13th/Harrison (771 vehicles), and 13th/Bryant Streets (1,164 vehicles) traveling eastbound within the project limits would continue to be accommodated within the eastbound 13th Street roadway. The proposed roadway capacity of 1,900 vehicles per hour per eastbound lane (3,800 vehicles for two travel lanes) after implementation of the project would continue to provide adequate vehicle capacity on 13th Street in the future.

Given the capacity of the proposed eastbound roadway reconfiguration, it is not anticipated that vehicle trips would substantially divert to nearby streets that could substantially affect transit travel times on intersecting streets such as Folsom, Harrison, and Bryant streets. Thus, the proposed project would not substantially impede transit operations on intersecting streets where transit service operates. Therefore, given that the proposed project would not substantially affect transit operations, the transit impacts associated with the implementation of the project would be less than significant.

Pedestrian Impacts

The proposed project is not anticipated to induce growth that would generate new pedestrian trips. Therefore, the proposed project would not result in substantial overcrowding on nearby public sidewalks. In addition, the proposed project would not include sidewalk narrowing, roadway widening, or other conditions that could create potentially hazardous conditions or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

13th Street is identified as a High Injury Corridor for vehicles and bicycles only. In addition, intersecting streets such as South Van Ness Avenue, Folsom Street, Harrison Street, and Bryant Street were also identified as a High Injury Corridor for vehicles and cyclists. The proposed project would not include any narrowing of existing sidewalks or other components that could negatively affect pedestrian circulation within the project area. Therefore, the proposed project would result in a less-than-significant impact to pedestrians.

Bicycle Impacts

The proposed project includes the installation of a new Class II and Class IV bicycle lane on 13th Street, between South Van Ness Avenue and Bryant Street. The proposed project would not generate new bicycle trips, but would continue to accommodate bicyclists traveling along nearby bicycle facilities (South Van Ness Avenue, Folsom Street, and Harrison Street). The proposed bicycle facility would create a new bicycle connection to other nearby bicycle facilities, including north-south bicycle facilities located on Folsom Street and Harrison Street and other east-west bicycle facilities on 11th Street and Division Street.

The proposed project would generally enhance cycling conditions along the eastbound 13th Street corridor. Provision of a new Class II and Class IV bicycle lane within the project limits would increase bicyclists' visibility. The dedicated 6-foot-wide bicycle lane, painted buffers and a physical separation from adjacent travel lanes, would reduce the potential for injury to bicyclists due to "dooring" (i.e., when a vehicle driver or passenger opens a door in the path of an oncoming bicyclist, causing a collision). Further, implementation of the proposed project would enhance bicycle circulation and safety within the project area, and improve connectivity with other east-west and north-south bicycle facilities. Thus, for these reasons, the impact of the proposed project on bicycle facilities and circulation would be less than significant.

Emergency Vehicle Access Impacts

In general, implementation of the proposed project would not hinder or preclude emergency vehicle access. Between South Van Ness Avenue and Bryant Street, two 10-foot-wide, mixed-flow travel lanes would be retained on eastbound 13th Street. Although this would not be considered a significant impact, the new Class II and Class IV bicycle lane on 13th Street would not include any raised separation that would restrict vehicles from accessing these lanes in the event of an emergency. The design of proposed project improvements, including the new bicycle lane would be reviewed by SFMTA's Transportation Advisory Staff Committee (TASC)[3] prior to SFMTA approval and implementation. The Transportation Advisory Staff Committee will provide a recommendation for approval regarding the proposed project, which will include a review of applicable standards, including emergency vehicle access.

SFMTA staff conducted a field survey to collect the location of emergency assets (i.e., fire alarm box, low-pressure fire hydrant, high-pressure fire hydrant, stand pipe, valves). The proposed project would not include closures or modifications to any existing streets or entrances to nearby buildings. Therefore, the proposed project would not create conditions resulting in inadequate emergency vehicle access.

Overall, with implementation of the proposed project, adequate street widths, clearance, and capacity for emergency vehicle access would be maintained, and therefore, the proposed project's impact on emergency vehicle access would be less than significant.

Loading

As observed by SFMTA, there are no existing loading zones located along 13th Street. Further, the proposed project would not eliminate any existing loading zones located on intersecting streets such as South Van Ness Avenue, Folsom Street, Harrison Street, and Bryant Street.

Further, the proposed project would not create additional demand for loading. Given that the number of existing loading zones would not be reduced, the proposed project would not result in significant loading impacts.

AIR QUALITY

Criteria Air Pollutants

The proposed project would not generate any new vehicle trips in the project area. However, the proposed project would result in physical roadway changes along the extent of 13th Street, between South Van Ness Avenue and Bryant Street, where the reduction in roadway capacity and the reconfiguration of lane geometries would potentially alter travel patterns in and around the project area. As stated above, the proposed project would not generate additional vehicles trips, but reducing roadway capacity may result in increased delay at some locations, and therefore increased emissions of criteria pollutants or

[3] SFMTA's Transportation Advisory Staff Committee is an interdepartmental committee that includes representatives from Public Works, SFMTA, the Police Department, the Fire Department, and the Planning Department.

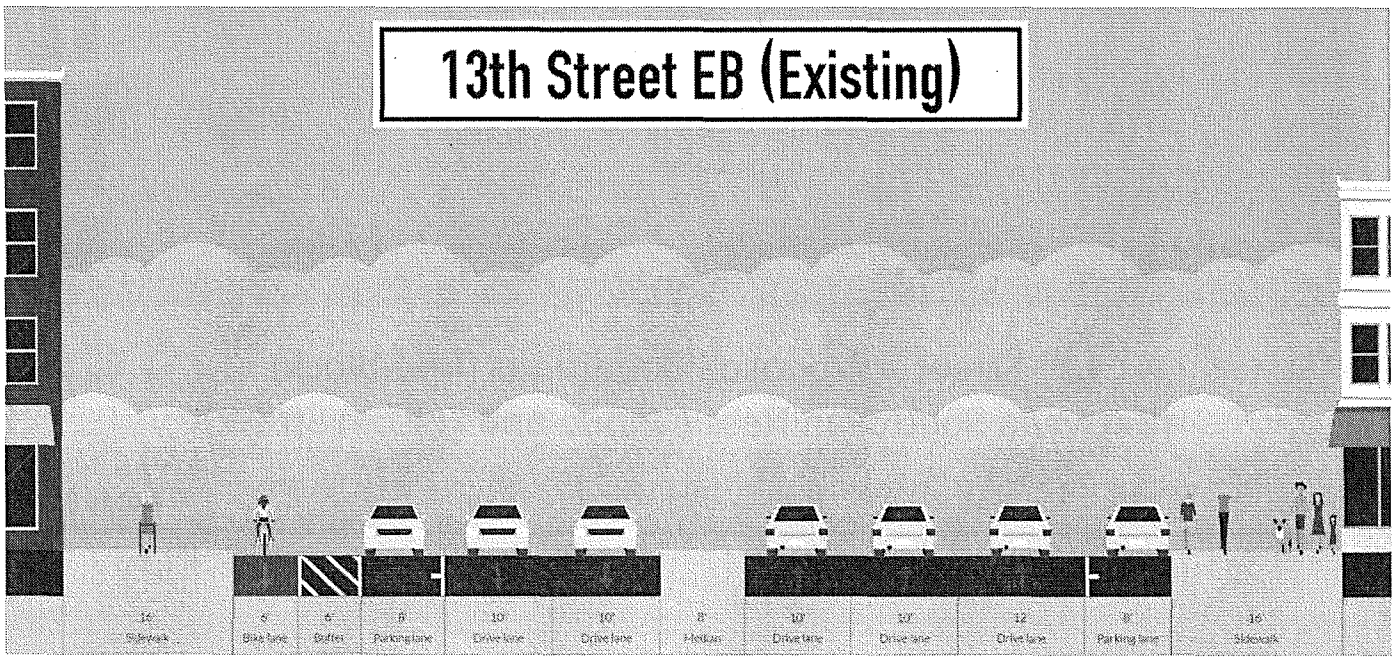
ozone precursors would occur in those locations. These increases are likely to be minor because drivers would be expected to modify their travel routes, or in some cases change their travel modes. Any changes in travel mode to buses, bicycles, and/or walking would reduce vehicle-generated emissions that would otherwise occur. Furthermore, changes in criteria air pollutant and ozone precursor emissions are evaluated on an average daily and maximum annual basis. The proposed project would not generate new vehicle trips, would not divert a substantial number of trips to alternate corridors, and would increase delay at some intersections, thus the air quality impact related to vehicle delay at intersections would be relatively minor. Therefore, impacts would be less than significant.

Overall, the proposed project would not result in significant impacts related to any environmental topics.

Conclusion. The proposed project satisfies the criteria for exemption under the above-cited classification(s). In addition, none of the CEQA Guidelines Section 15300.2 exceptions to the use of a categorical exemption applies to the proposed project. For the above reasons, the proposed project is appropriately exempt from environmental review.

Figure 1 – Existing Cross-Sections

13th Street EB Bicycle Facility Project



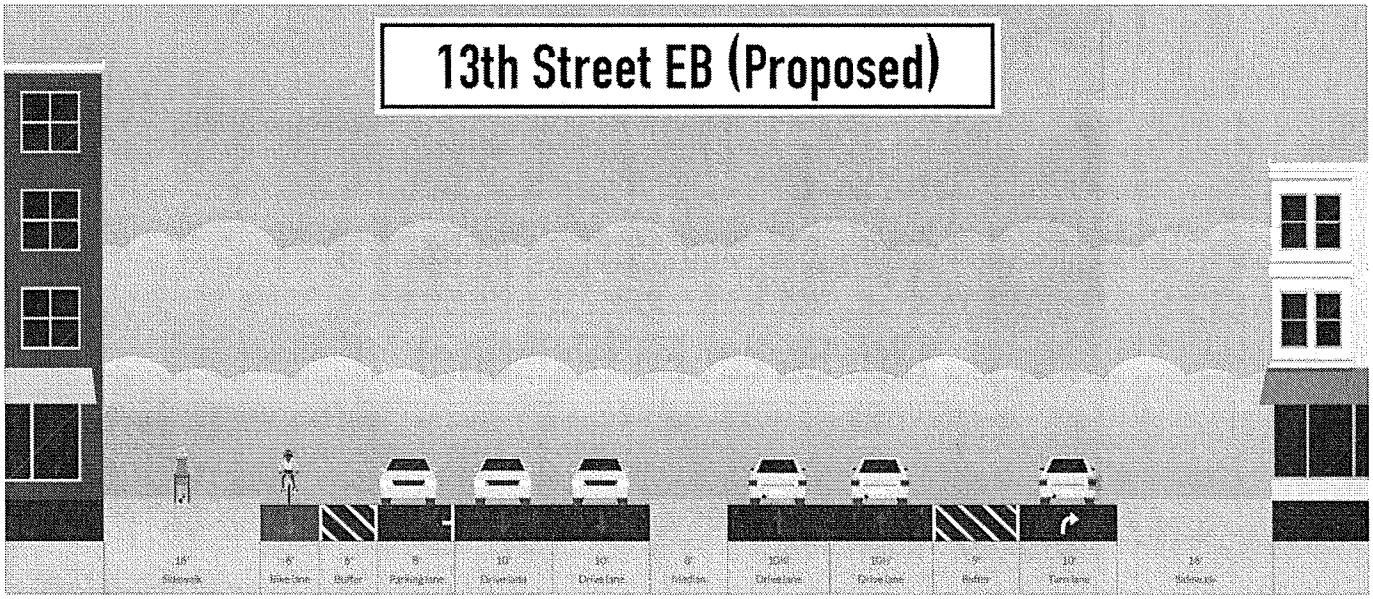
13th Street – Existing Conditions (Mid-block)
(Between South Van Ness Avenue and Bryant Street)

Source: SFMTA – StreetMix, 2017

Not to Scale

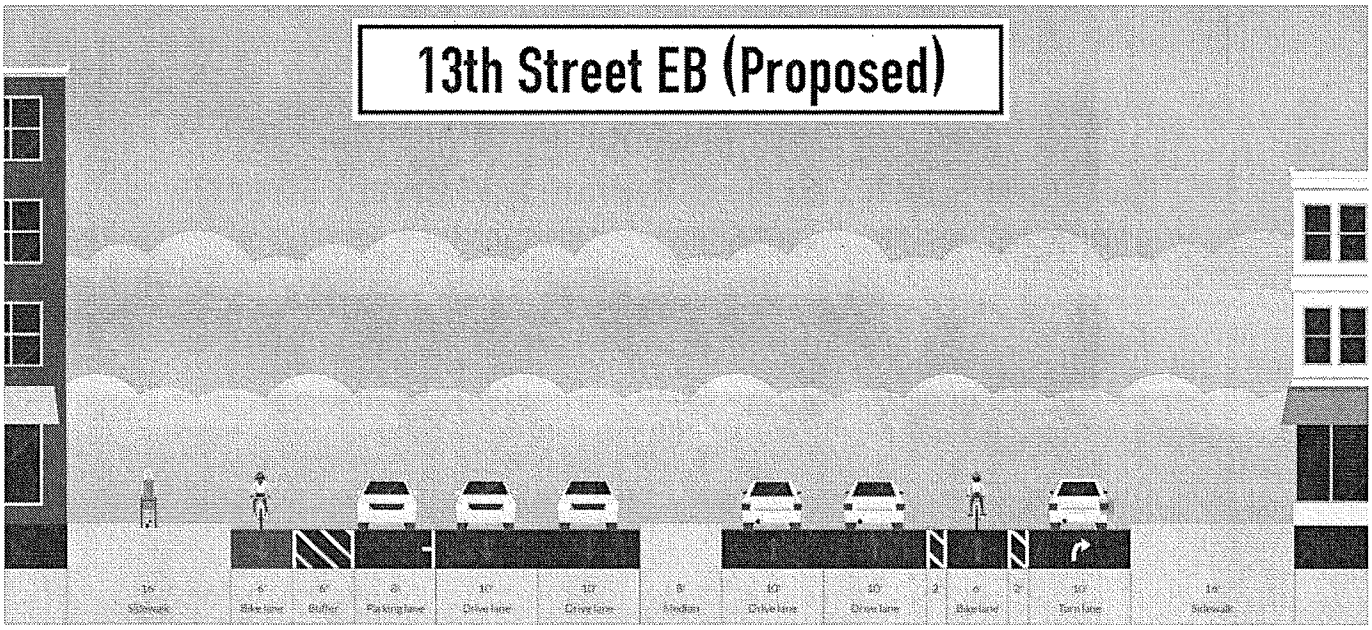
Figure 2 – Proposed Cross-Sections

13th Street EB Bicycle Facility Project



13th Street – Proposed Conditions (Mid-block)
(Between South Van Ness Avenue and Folsom Street)

Not to Scale



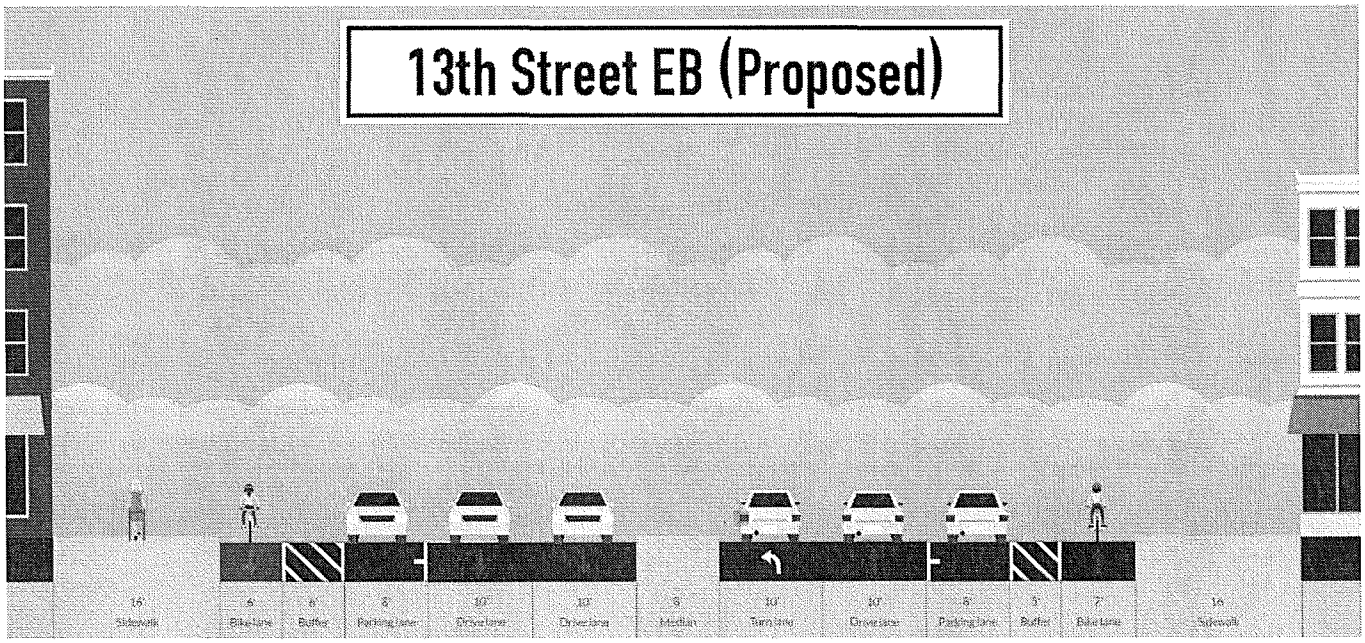
13th Street – Proposed Conditions (Mid-block)
(Between Folsom Street and Harrison Street)

Source: SFMTA – StreetMix, 2017

Not to Scale

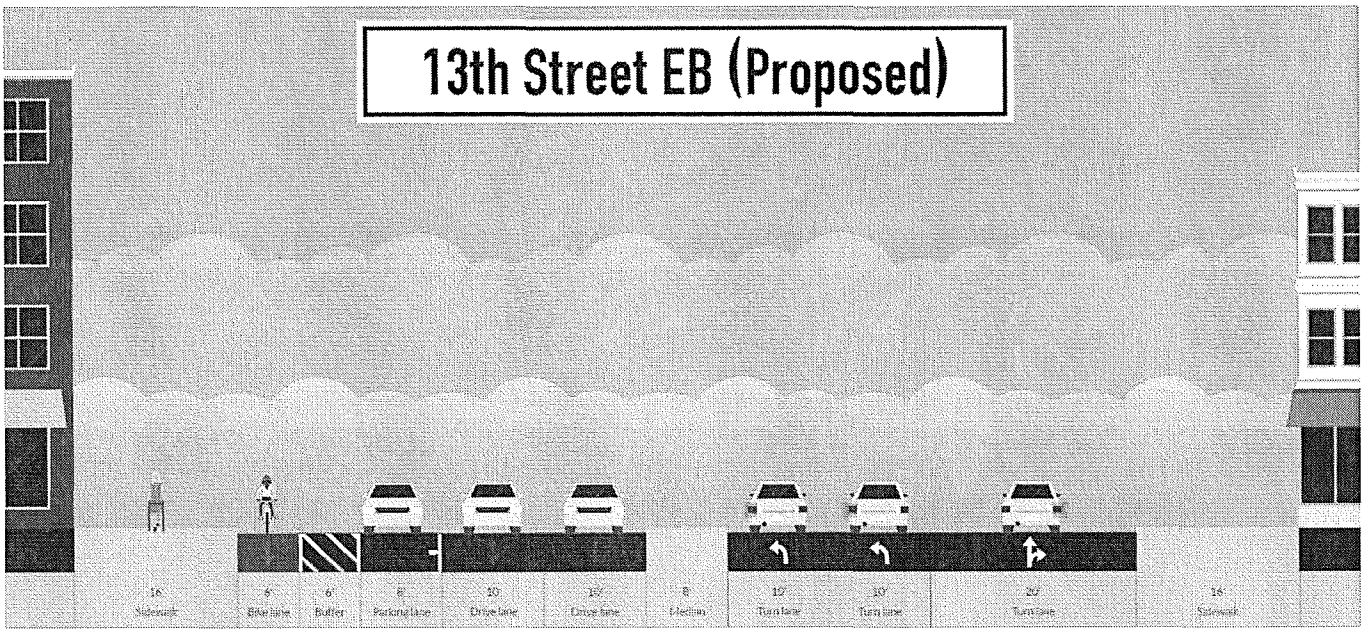
Figure 3 – Proposed Cross-Sections

13th Street EB Bicycle Facility Project



13th Street – Proposed Conditions (Phase I)
(Between Harrison Street to Bryant Street)

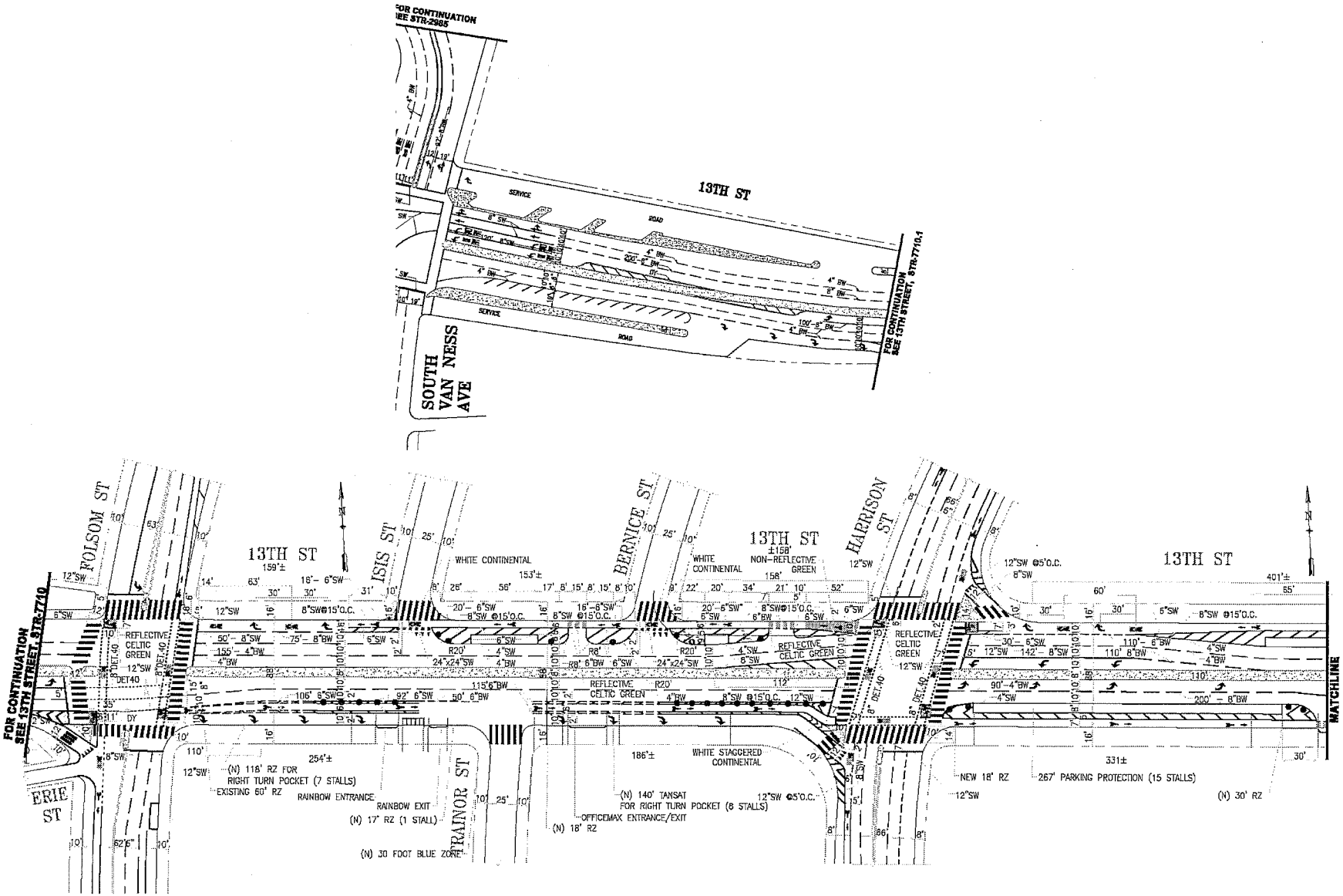
Not to Scale



13th Street – Proposed Conditions (Phase II)
(Between Harrison Street and Bryant Street)

Source: SFMTA – StreetMix, 2017

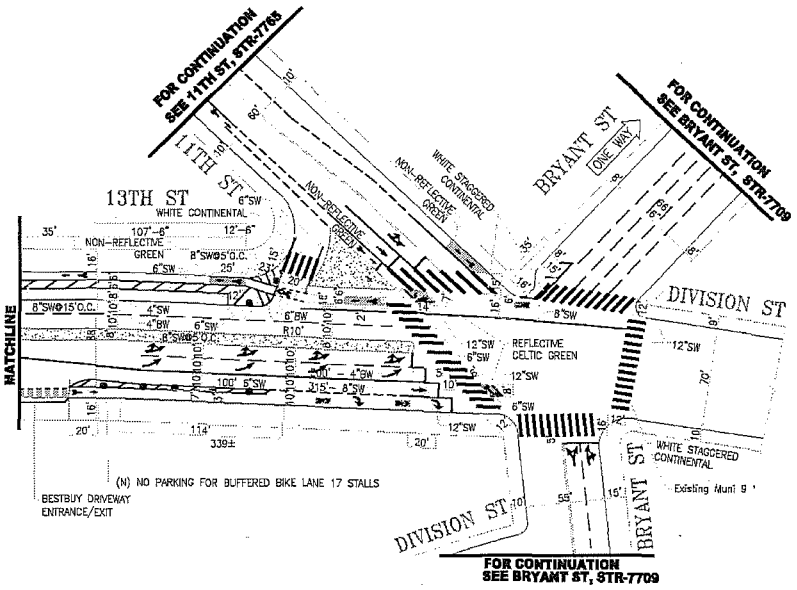
Not to Scale



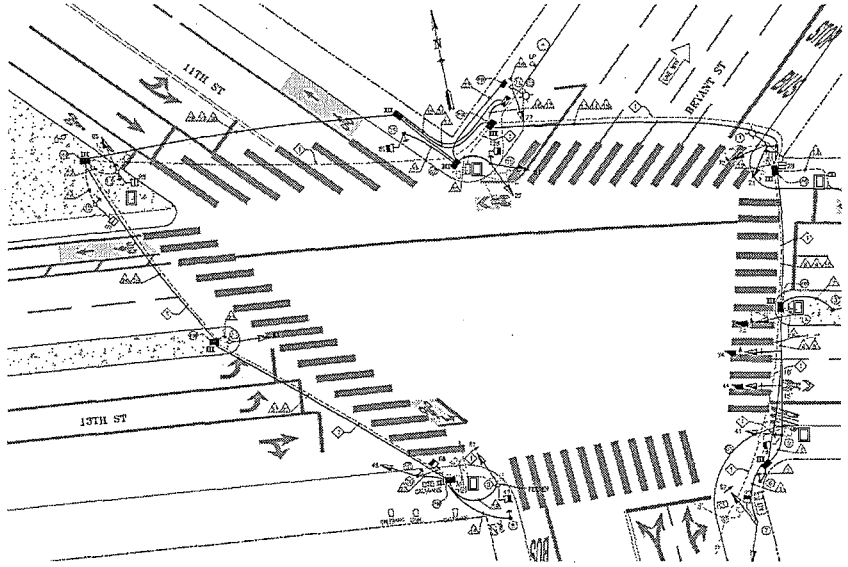
Source: SFMTA, 2017

Figure 4A – 13th Street EB Bicycle Facility - Striping Plan
(Between South Van Ness Avenue and Harrison Street)

Not to Scale



Phase I - 13th Street Configuration
(Between Harrison Street and Bryant Street Only)



Phase II - 13th Street Configuration
(Between Harrison Street and Bryant Street Only)

Source: SFMTA, 2017

Figure 4B – 13th Street EB Bicycle Facility - Striping Plan

Not to Scale