



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: July 11, 2008
TO: Interested Parties
FROM: Joan A. Kugler, Senior Environmental Planner
RE: CASE NO. 96.281E: CENTRAL SUBWAY PROJECT (PHASE 2 OF THE THIRD STREET LIGHT RAIL PROJECT) COMMENTS AND RESPONSES

Contract No: CS-138 – Central Subway
Routing Date 7-11-08
File No.: 1.70-01-20
Doc No.: 02888 Initials: JK
MTA Project No. M544 PB/Wong Project No. 13217

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Attached please find a copy of the Comments and Responses document on the Draft Supplemental Environmental Impact Report (DSEIR) for the above-referenced project, for your review. This document along with the DSEIR is scheduled to be before the Planning Commission for Final SEIR certification on July 24, 2008. The Planning Commission meeting begins at 1:30 pm in Rm. 400 of City Hall, 1Dr. Carlton Goodlett Place. Please call 558-6422 on Monday July 21, or thereafter for a recorded message giving a more precise time that this matter will be heard. Please note that the public review period closed on December 10, 2007.

The Commission does not conduct a hearing to receive comments on the Comments and Responses document, and no such hearing is required by the California Environmental Quality Act. You may, however, always write to the Commission members or to the President of the Commission at 1650 Mission Street and express your opinion about the Comments and Responses document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive a copy of the Comments and Responses document in addition to the DEIR, you technically have a copy of the Final EIR. The Draft document was delivered to public libraries in the project area and is also posted on the SFMTA website. Thank you for your interest in this project.

We are sending this to you now, so that you will have time to review the document. If you have any questions concerning the attached Comments and Responses, or this process, please contact me at (415) 575-6925.

Thank you for your consideration of this matter.

Attachment

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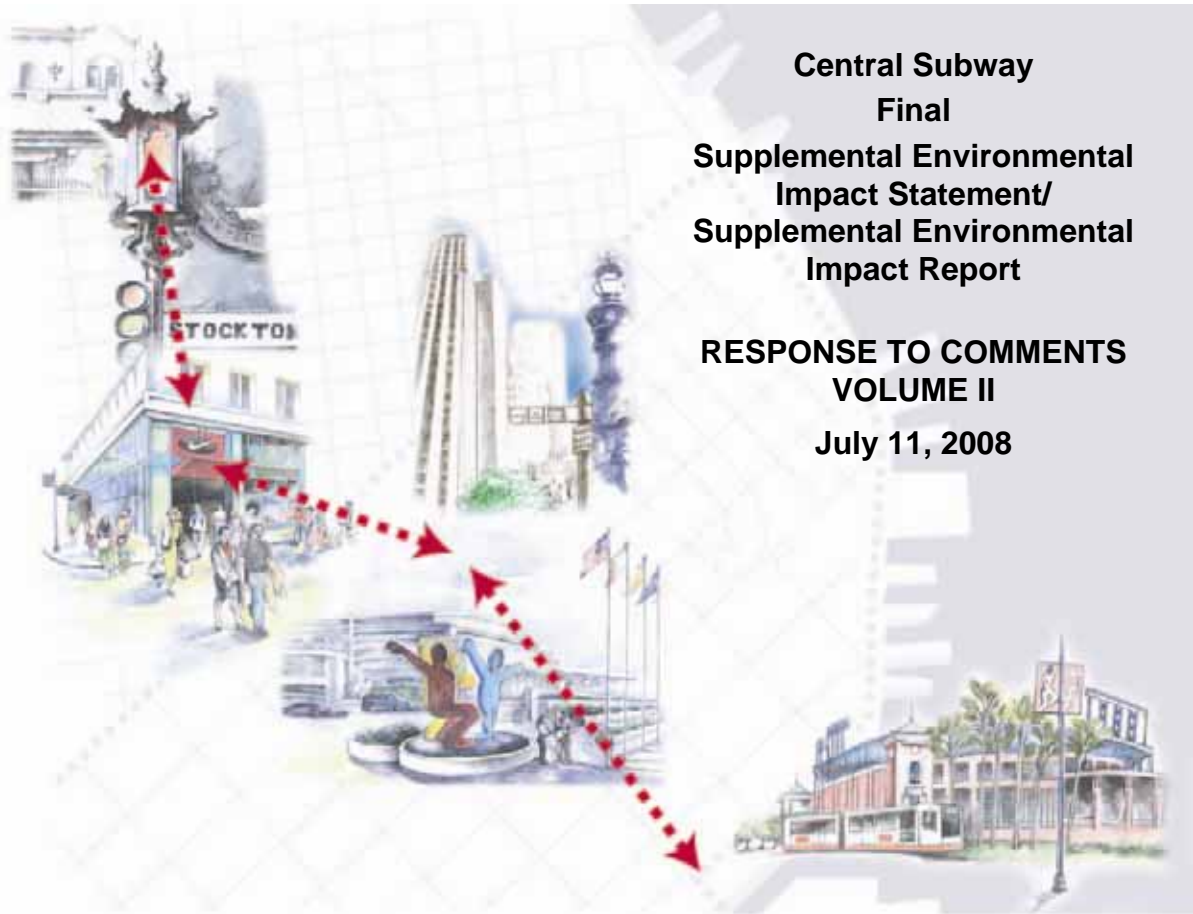
179		San Francisco Planning Department	Linda	Avery	Commission Secretary		1650 Mission Street, Suite 400	San Francisco	CA	94103
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**Central Subway
Final
Supplemental Environmental
Impact Statement/
Supplemental Environmental
Impact Report**

**RESPONSE TO COMMENTS
VOLUME II**

July 11, 2008

**FEDERAL TRANSIT ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION**

**CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT**

Case No. 96.281E
State Clearinghouse No. #96102097

RESPONSE TO COMMENTS
VOLUME II
**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT/
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT**

for the

**CENTRAL SUBWAY/THIRD STREET LIGHT RAIL PHASE 2
IN THE CITY AND COUNTY OF SAN FRANCISCO**

prepared by the

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION**

and the

CITY AND COUNTY OF SAN FRANCISCO PLANNING DEPARTMENT

JULY 11, 2008

Pursuant to

National Environmental Policy Act (42 USC 94332) 49 USC Chapter 53, 49 USC 9303, 16 USC 9470, 23 CFR Part 771, 23 CFR Part 450, Executive Order 12898 Section 6002 SAFETEA-LU, 40 CFR parts 1500-1508, and California Environmental Quality Act, PRC 21000 *et seq.*; and the State of California CEQA Guidelines, California Administrative Code, 15000 *et seq.*

**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT/
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIS/SEIR)**

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1.0 INTRODUCTION

This document contains all public comments received on the Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (Draft SEIS/SEIR) prepared for the Central Subway Project and the responses to those comments. Following this introduction, Chapter 2.0 contains a list of all persons and organizations who submitted written comments on the Draft SEIS/SEIR during the public review period from October 17 through December 10, 2007 or who testified at the San Francisco Planning Commission public hearing on the Draft SEIS/SEIR held on November 15, 2007.

Chapters 3.0 and 4.0 contain the comments and responses. Section 3.0 contains written comment letters received by the Planning Department during the public comment period. Section 4.0 contains transcribed comments made at the public hearing on the Draft SEIS/SEIR and the responses to each of those comments. Comments are grouped by person commenting, rather than by topic, to allow commenters to easily find the responses to their comment(s). As the subject matter of one comment may overlap with that of others, the reader may be referred to another response for a complete answer to a particular comment. Each comment letter on the Draft SEIS/SEIR has been given a letter identifier and each comment has been given an identifying number. The comments made at the public hearing have each been given a comment number. Each substantive comment on the Draft SEIS/SEIR is labeled with a number in the margin, and the responses to each comment follows each letter.

Chapter 5.0 contains the staff initiated changes to the Draft SEIS/SEIR. The staff-initiated changes, made by the preparers, revise text of the Draft SEIS/SEIR to correct or clarify information presented in the Final SEIS/SEIR. All the revisions to the text of Volume I, whether from responses to comments or staff initiated changes, are shown by underlining the text. Text that was deleted is shown with a strikeout.

The responses to comments included in the Final SEIS/SEIR, Volume II, respond solely to comments on the adequacy of the approach, analysis, and information in the Draft SEIS/SEIR. Some comments received did not pertain to physical environmental effects of the Project, but responses may be included to provide information for use by decision makers. Comments regarding the merits of and need for the Central Subway Project will be considered by the San Francisco Municipal Transportation Agency

(MTA) as part of the project approval process. A decision regarding approval of the Project will be made subsequent to certification (determination of completeness) of the Final SEIS/SEIR. In order to approve the Project, the MTA will need to adopt a “Statement of Overriding Considerations,” as required by CEQA, to explain the public good that would be achieved by implementation of the project despite the significant and unavoidable impacts that have been identified in the environmental document.

The text of the SEIS/SEIR, with the recommended text changes incorporated, is contained in Volume I of this Final SEIS/SEIR.

2.0 LIST OF PERSONS COMMENTING

The following lists identify all groups, agencies, or individuals commenting on the Draft SEIS/SEIR. Each comment letter and each person commenting at the public hearing has been given a letter identifier as noted below based on the order in which their comments were received.

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3.0 WRITTEN COMMENTS AND RESPONSES

This chapter includes a copy of the comment letters received during the public review period on the Draft SEIS/SEIR and responses to those comments. Each letter is labeled with a letter identifier and each substantive comment on the Draft SEIS/SEIR is labeled with a number in the margin of the letter. The responses to each comment in each letter are presented immediately following the letter.

Text changes to the Draft SEIS/SEIR resulting from comments are also presented in this chapter and are included as part of the responses. Text that has been added is underlined and text that has been deleted is shown with a ~~strike through~~. The intent of these text changes is to clarify or amplify information already provided in the Draft SEIS/SEIR. The text changes do not present any new information that would alter the analysis or conclusions presented in the Draft SEIS/SEIR.

Letter A

770 Stockton Street
San Francisco, CA 94108

Joan Kugler
Bill Wycko
San Francisco Planning Department
Central Subway Draft SEIS/SEIR
1650 Mission Street
San Francisco, CA 94103

RECEIVED

OCT 22 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

RE: Central Subway/Chinatown extension-
Demolitions, disruptions, community outreach

October 18, 2007

To the Planning Department and city officials:

On behalf of many residents of Chinatown, I am expressing my continued opposition to the proposed Chinatown extension of the Central Subway, the displacement and destruction of vital businesses and housing along the Stockton Street corridor, and the potential unintended damage to all properties along Stockton Street during construction.

I have received a copy of the SEIR/SEIS draft. Nothing in this report adequately addresses concerns that I and other individuals have expressed in the relatively few (and poorly promoted/planned/attended) "community outreach" meetings that your department, the City, and the Chinatown leadership have offered.

A-1

I have opposed the need for this politically-driven pork barrel project from the beginning. A subway system is redundant. Transit along Stockton Street has been adequately met by existing bus systems. I believe that Chinatown's citizens feel the same way, in spite of top-down speculations and projections of politicians, and a Chinatown political and business establishment that is thoroughly out of touch with ordinary citizens.

At best, the disruption and damage from the construction of this redundant subway---one that merely adds new layers of congestion to existing bus routes---far outweighs any incremental gain in time to get distance from the proposed Chinatown station to Market Street, where the vast majority of commuters transfer to the Muni metro to other Chinese neighborhoods in the city. Particularly in light of the failure so far of the T-Third line, I am extremely skeptical about a similar incursion into Chinatown.

A-2

This subway extension is window dressing for city officials, but offers little for commuters and tourists in and out of Chinatown, and, most importantly, damages Chinatown for those who live and work along Stockton Street.

The manner in which this proposed subway extension is being imposed upon the Chinatown community is despicable. In addition to **little or poor direct contact with Chinatown citizens** (on the part of every agency and organization involved), there has been extremely poor media coverage, and an **almost complete lack of materials in Chinese**. This project is being shoved down our throats *without the knowledge, permission, and input of those most affected*.

A-3

The vast majority of people who live and work on Stockton Street (most of whom do not speak or read English, are too busy to attend civic meetings, etc.) today, years later, still have not been properly informed about the planned disruptions that a huge bureaucratic machine is imposing on the people most affected.

Take this latest draft. The only notice Chinatown itself received about the new SEIR/SEIS report has come in the form of a few English-only notices crudely taped on light poles along Stockton

Street. They look like junk mailers and few people have stopped to read them. They are in English only. This is inadequate and insulting.

To add to the insult, not only is the SEIS/SEIR itself only in English, it is only available online at an SFMTA web site. Problem: very few residents and business owners of Chinatown have the language capability to read this arcane report, and even fewer have the computers with which to access this report. Chinatown is low income!! The web site is also extremely cumbersome to download, even for those with computers.

A-3
Cont.

Providing the report in person at the SFMTA office is a poor option. Few Chinatown merchants or residents have the time during the work day to obtain a copy of the report in person.

Regarding the SEIR/SEIS report itself, I have many concerns.

I am particularly alarmed by the proposed demolitions of the properties at 814-828 Stockton or 933-949 Stockton to accommodate a Chinatown station. According to your report, these and other properties along Stockton Street were very casually targeted for demolition *"after a walkaround with Chinatown community members"*. In other words, the properties in which vital Chinatown businesses operate, and predominantly low-income residents live, will, largely without their knowledge and input, be demolished, dislocated, forced to shut down. On whose orders, and with whose permission? Who were these "members" who so cavalierly deemed which businesses will be closed, and who will be forcibly evicted?

A-4

What is going to happen to the many people who will be evicted from housing and businesses that they have operated for decades? How will the proposed destruction of these businesses, residences and lives ever be "mitigated"? Certainly not by taking rubble from properties and putting this rubble into "museums". Your projections fail to address the fact that the negative impact of even one business or a single residential unit in Chinatown is magnified exponentially, because of the closeknit nature of the neighborhood. Again, a "shiny new transit system" does not make up for such losses.

Today (10/18/07), I asked several business operators at the two demolition addresses if they are aware that their building has been targeted. **Approximately one out of ten were unaware of demolition plans.** (The notices taped along the street have clearly not been seen, read or understood.) The one operator who was aware of demolition plans was outraged at the probability that his long-established business would be forced to close, and expressed anger at being a powerless "small fish" to get the attention of politicians, city officials or community "leaders".

I also remain deeply concerned about the potential physical damage that may be done to all properties along Stockton Street due to vibration from the construction, and, longer-term vibration from the operation of the subway itself. Every building along Stockton Street and the proposed tunnel is historic, many built on masonry foundations. My property, for instance, is an historic building within 200 feet of a proposed station location. What exactly will happen to my building when "ambient vibration" rattles the walls and foundation? What inconveniences will be suffered by my tenants, many of whom are elderly? Besides vague promises to "mitigate" vibration, I see no convincing evidence that collateral damage around the construction site will be zero.

A-5

It also goes without saying that severe traffic congestion and inconvenience during construction will make working and living along Stockton Street intolerable for all of its residents.

A-6

There are other negative "impacts" that a Chinatown subway extension will introduce, and officials have failed to address most of them. These include the likely influx of crime, more homelessness (epidemic already in Chinatown), even more vandalism and graffiti (also epidemic and worsening throughout Chinatown), and nightmare scenarios for the neighborhood, such as major earthquakes and terror scenarios (streetcar bombings).


A-7

In short, the SEIS/SEIR is vague, self-serving and unresponsive.

Not only must "outreach" to Chinatown's citizenry be dramatically increased, immediately and directly, *and in their language*, the residents, tenants and business operators of Stockton Street deserve a direct vote on the project and every single aspect of it. *We deserve a say. We deserve the right to oppose.* We are talking about a large scale and unwelcome intrusion into our livelihoods and lives.

A-8

Personally, I will continue to oppose the subway extension, and will support any and all opposition from other Chinatown residents and business owners, until we are given far more convincing evidence that we stand to benefit, in any way, from years of construction nightmares, forced dislocations, property damage and unanticipated consequences.



Larry Chin

Reponses to Letter A

A-1

Commenter's opposition to the project due to displacement of residences and businesses is noted. Comments received at public meetings have been responded to and the project alternatives have been modified and refined throughout the project's history in response to public input. The project development history is outlined in the SEIS/SEIR on pages 2-52 through 2-62. As detailed in Section 1.3 of Volume I, there is a need for transportation improvements in the Central Subway Corridor to meet expanding population and employment. The majority of letters and comments received during the 55-day public comment period for the SEIS/SEIR expressed support for the Central Subway Project. Many of these letters and comments came from Chinatown residents and community organizations in support of the project.

A-2

The Central Subway Project is projected to generate approximately 18,470 to 21,010 net new transit riders on the corridor compared to the No Project Alternative by 2030. The increase in ridership can be attributed to improvements in service reliability and reductions in travel time (over 10 minutes savings between Fourth and King Streets and Chinatown). The buses currently serving Chinatown and Union Square are routinely delayed by surface congestion on Stockton Street due to the narrow width of the street and competing demands for street space by autos, buses, bicycles, trucks, and pedestrians. In 2030, these bus lines would carry about 5,280 passengers during the p.m. peak period in the Central Subway corridor. By providing an exclusive transit right-of-way underground, the congestion problems would be reduced. Trains would be able to operate much faster as they would not be subject to surface congestion and traffic controls and there would be only a limited number of stops. This not only improves service to existing transit passengers, but is also expected to generate new transit riders to the system.

Achieving these transit improvements would require an extended construction period of from 5½ to 6 years that would result in disruption to the residents and businesses along the corridor. These impacts are described in Chapter 6.0, Construction Methods, Impacts, and Mitigation, of the SEIS/SEIR. The San Francisco Municipal Transportation Agency (SFMTA) will ultimately make the decision as to whether the project should be approved based on the project benefits and impacts and responses to public comments outlined in the Final SEIS/SEIR.

A-3

During the planning and project development phase of the Central Subway, public presentations were made to community groups and stakeholders along the corridor. Many of these meetings were held in Chinatown or with representatives from the Chinatown community. Informational materials pertaining to the project have been made available in English, Chinese, and Spanish to ensure a broad distribution of information. The newsletter on the Central Subway website is posted in Chinese. Representatives of the project have attended community events in Chinatown, such as the Harvest Moon and Chinese New Year festivals, to distribute project-related information. In addition the Community Advisory Group for the project included representatives from the Chinese Chamber of Commerce, Chinatown Community Development Center, and Chinatown TRIP. Chapter 11.0 Coordination and Consultation provides a summary of the outreach effort conducted for the project.

To provide opportunities for public comment during the environmental review process, a public scoping meeting was held in June 2005 and additional public meetings were held in October 2006 to inform the public of updates to the project. When the Draft SEIS/SEIR was released on October 17, 2007, a press conference was held in Chinatown with the Chinese press and an article about the Central Subway and the availability of the environmental document was published in Chinese the following day in the Sing Tao Daily newspaper. The Draft SEIS/SEIR was mailed to those who had previously requested copies, the Notice of Availability was mailed to those expressing general interest in the project, multi-lingual postcards were mailed to property owners along the corridor, copies of the Notice of Availability were posted along the corridor (including notices in Chinese posted on November 6, 2007 in Chinatown), and two public meetings (one in South of Market and one in Chinatown) describing the project and the environmental impacts were held prior to the formal public hearing at the Planning Commission.

On October 31, the Sing Tao Daily announced the November 8 meeting at the Gordon J. Lau Elementary School located at 950 Clay Street in Chinatown. At the November 8 Chinatown meeting the presentation was made in Chinese as well as English and presentation materials, including the Executive Summary of the Draft SEIS/SEIR were provided in Chinese. Copies of the Draft SEIS/SEIR were available for review at the San Francisco Planning Department, the San Francisco main library and branch libraries, including the Chinatown library at 1135 Powell Street; and the Chinatown Resource Center, Chinatown Transportation Research and Improvement Project (TRIP), Chinatown Community Development Center (CCDC), and Chinese Chamber of Commerce.

A-4

Section 2.4.4 Screening of Design Options/Alternatives Not Carried Forward (pages 2-58 to 2-62) describes the screening process used to identify the two station alternatives analyzed in the SEIS/SEIR for Chinatown. The project team involved in the screening process included representatives of SFMTA, the Community Advisory Group, the CCDC, and the engineering consultants. Four potential station sites in Chinatown along Stockton Street were assessed. Screening criteria used to evaluate the alternatives included: building size and height, accessibility for passengers, ability to accommodate station facilities and vent shafts, access to the station site by construction equipment, space for construction materials, extent of business and residential displacement, post construction transit-oriented development potential, possible environmental impacts (noise, historic property, parkland), and consistency with the project boundaries established in the certified 1998 EIS/EIR for the Third Street Light Rail Project. Two alternative locations for the station emerged from the screening assessment: the property at 814-828 Stockton Street and the property at 933-949 Stockton Street. These two properties are analyzed in the SEIS/SEIR.

Mitigation for displaced residents and businesses is described in SEIS/SEIR Section 6.5.2 Acquisition and Displacement, on pages 6-48 through 6-54. Mitigation measures include the development of a detailed relocation plan designed to minimize impacts on businesses and residents. Copies of the Draft SEIS/SEIR were mailed to the property owners identified for displacement by the project, if approved, and notices of the availability of the draft document were sent to residents and businesses along the corridor.

The Notice of Availability and the public hearing before the Planning Commission was posted along the project corridor from October 17 through December 10, 2007. In the Chinatown area, these notices were both in English and in Chinese.

Following the selection by San Francisco Municipal Transportation Agency (SFMTA) of a Locally Preferred Alternative (LPA), approval of the Final SEIS/SEIR by the San Francisco Planning Commission, and issuance of the Record of Decision (ROD) by the Federal Transit Administration (FTA), which is expected to be completed by fall 2008, the SFMTA would send a certified Notice of Intent to the property owners on the intent to appraise and possibly acquire the property. The SFMTA would offer funding assistance to the property owner to hire legal counsel and an independent appraiser. The city would review and approve the appraisal and an offer letter would be provided as a basis for negotiation of price and conditions. The responsibility to notify tenants would initially be the SFMTA in cooperation with the property owners. The transit-oriented development proposed as an independent project to be built above the Chinatown Station would also include units of low-income housing and retail

space, however, the proposed transit-oriented development would not mitigate to a less-than-significant level, the impacts to displaced residents and businesses.

A-5

As shown from the Noise and Vibration evaluation in Chapter 5, pg. 5-79, the FTA vibration criteria of 72 Vdb would not be exceeded during operation in the Chinatown portion of the Central Subway Project (page 5-79 and Tables 5-9 and 5-12) for wood-frame buildings. Noise and vibration during construction would need to meet the San Francisco Noise Ordinance (Article 29, Regulation of Noise), which limits noise from construction equipment to 80 dBA at 100 feet and all construction activities within 200 feet of a historic building would have to meet the vibration limits of 72 Vdb established by FTA. A detailed construction noise and vibration analysis would be prepared to assess potential impacts to receivers within close proximity to the underground mining and excavation operations during final engineering design for the project. The Noise and Vibration Control Plan would include pre-construction measurements and periodic vibration monitoring using approved seismographs. If at any time the construction activity exceeds the 0.12 inches/second of peak particle vibration (PPV) velocity level, in any direction, for any length of time at any historic structure, the construction activity will be halted, as described under mitigation measures, until an alternative construction method can be used that would lower vibration levels (pages 6-117 to 6-118 of the SEIS/SEIR). The Environmental Compliance Monitor would be responsible for independent monitoring during construction as described in the Mitigation Monitoring and Reporting Program (MMRP), Appendix I.

A-6

The construction period for the project, which would last 5½ to 6 years would have an impact on residents and businesses located along the corridor. These impacts and the recommended mitigation measures are summarized in Chapter 6.0, Construction Impacts and Mitigation. The transportation impacts are discussed on pages 6-34 through 6-46 of the SEIS/SEIR.

A-7

There is no evidence to indicate that the introduction of a fixed-rail system would increase crime, homelessness, vandalism or graffiti. The SFMTA, in addition to the closed circuit system used for monitoring subway stations, will provide it own security guards for patrolling its fixed-facilities (page 5-15 of the SEIS/SEIR).

A-8

The SFMTA has continued outreach to Chinatown residents and business owners along the Stockton Street corridor during the preparation of the Final SEIS/SEIR and plans to maintain community contacts as the project, if approved, progresses into the final design and construction phases. Newsletters translated to Chinese have been distributed and notices of public meetings and agency meetings in Chinese have been distributed to residents and businesses.

Letter B

JOAN JOAQUIN-WOOD
P.O. Box 330214
SAN FRANCISCO CA 94133-0214

October 21, 2007

**Bill Wycko, Review Officer
Planning Department
Central Subway Project
1650 Mission St., Suite 400
San Francisco 94103**

RECEIVED
OCT 23 2007
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Dear Mr. Wycko,

I am writing in opposition to the Central Subway project which projects a subway from 4th and King Streets to Columbus and Union, with the stated goal of service to Chinatown.

First of all, Columbus and Union is not located in Chinatown. It is not even very close. Chinatown starts at Broadway Street, possibly Vallejo, and extends south from there. That is three blocks, possibly two, away. I am told Union and Columbus is the desired terminus as this location is more convenient for a turnaround.

B-1

What about the convenience of those of us who live in North Beach and Telegraph Hill? What about our convenience? Columbus and Union has 5 bus lines passing by the intersection - the 30, the 41/45, 9X, 39, and a bus numbered 20 which I have seen once though empty. Also, there is said to be an "Owl" bus after some late hour. Never seen it at all.

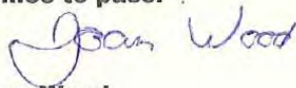
I figure it will take 3 or 4 YEARS to build this project. That will represent a 100% disruption for the thousands that live in the neighborhood. If the City wants service to Chinatown (which service obviously already exists, else how would so many individuals have arrived there?), let it build the turnaround at Broadway and Columbus.

B-2

I have lived continuously in North Beach and on Telegraph Hill since 1962 and use the bus lines every day. I never voted for this subway, and I suspect the City doesn't have the courage to put this proposal on the ballot now because only a few who now walk everywhere would vote for it.

B-3

Chinese spokespeople like Rose Pak have been proposing various ways to improve business in Chinatown ever since the 1989 earthquake. I suspect this idea started that way. Unfortunately I know that a few residents of Telegraph Hill also think this subway is a good idea. Good grief! They will be sorry if it comes to pass.



**Joan Wood
Cc: Aaron Peskin**

Responses to Letter B

B-1

Commenter's opposition to the project is noted. The location of the temporary construction extraction pit for the tunneling machine, located at Union Street and Columbus Avenue in North Beach, is not the location of the turnaround (crossover tracks and twin storage tracks) for the Central Subway. The northern limit of the Central Subway Project, including the turnaround, is in Chinatown at Jackson Street. The Central Subway Project will not affect the 41, 30, 45 or 9X Muni buses at the Columbus Avenue and Union Street intersection.

B-2

The Central subway crossover and twin storage tracks would be located between Clay Street and Jackson Streets, under Stockton Street in Chinatown. The temporary extraction shaft opening for the construction variant (North Beach Tunnel Construction Variant) described on pages 2-33 to 2-34 of the SEIS/SEIR, would be located within the middle two lanes of Columbus Avenue. The construction of this temporary construction shaft is estimated to take five to six months, and would be for the purpose of removing the tunnel boring machine (TBM) when underground construction is complete.

B-3

Comment noted. The Central Subway is the second phase of the 1998 Third Street Light Rail Project, which was part of the City approved Four Corridor Plan (June 1995) and the 1997 Proposition B Local Sales Tax for Transportation passed by the voters of San Francisco in 1989.

See SEIS/SEIR Section 2.4, Project Development History (page 2-52) for a discussion of studies and decisions leading to the Central Subway Project.

Comment Form C



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6400

Planning
Information:
415.558.6377

PUBLIC COMMENTS 公眾意見:

OK, but most of the stations need to be relocated for convenience and possibly safety.

I would recommend moving the Chinatown Station to Stockton & Pacific for better access. Almost 95% of Muni riders board from there and 80% of those are fare evaders. Moving this station there will create better access flow and reduce traffic congestion along Stockton St. & Pacific Ave. (Illegal Parking).

I would recommend you move the Union Square Station to Geary Street to serve the BART (there is a Wikipedia article on it) and will make a valuable intermodal station, and will
請把我加入保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

NAME 姓名

MAILING ADDRESS 郵寄地址

PHONE NUMBER 電話號碼

goodshapel35110@gmail.com
EMAIL ADDRESS 電郵地址

Improve access to the Richmond by transferring LRVs to the General Corridor (even though it is completely relocated) will improve access from Chinatown to Balboa Park by completely replacing the

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

關於這報告之公聽會將在本年十一月十五日約下午一時半舉行，地點為市政廳 400 號室（請於通內致電 415-558-6422 查詢準確時間）。

Public comments will be accepted from October 17, 2007, to 5:00 p.m. on December 10, 2007. Written comments should be addressed to Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. Comments received at the public hearing and in writing will be responded to in a Comments and Responses document. If you have any questions about the environmental review of the proposed project, please call Joan A. Kugler at 575-6925.

書面意見請郵寄到 Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. 截止日期 十一月十五日 下午五時。書面意見及公聽會內發表的意見將在一個意見及回應的文件內作答。對補充報告有任何問題，請與規劃局 Joan A. Kugler 接洽，電話 415-575-6925。

www.sfulannino.org

The only other option is to restore the BART and implement H 95 of R...

Note: Commenter's paragraph concludes with "Bus Rapid Transit route."

C-1

C-2

C-3

Responses to Comment Form C

C-1

The northern boundary of the Central Subway Project is Jackson Street in Chinatown. This project boundary is consistent with the San Francisco County Transportation Authority's 1995 *Four Corridor Plan* that established project priorities for transit projects in the City. Moving the station to Pacific Street, would push the station location north of the project boundary established in the Four Corridor Plan and in the original 1998 Certified EIR/EIS for the Third Street Light Rail. Several locations, including a Pacific Street station, have been evaluated for the Chinatown station. Pages 2-59 through 2-62 of the SEIS/SEIR discuss the station alternatives and the screening process for narrowing the station locations to identify those carried forward in this SEIS/SEIR for analysis. The Pacific Street station was eliminated as an option during preliminary evaluation.

C-2 and C-3

Station entrances for both the Union Square/Market Street Station and Chinatown Station would provide access and egress for passengers traveling the Stockton Street Corridor. Passengers can access other Muni streetcar lines and BART at the Powell Street Station via a two-block subsurface connection from the Union Square/Market Street Station, as well as, the 2-Clement, 3-Jackson, 4-Sutter, and 38-Geary lines within one block at the surface. The Chinatown Station provides access to the 1-California line within one to two blocks of the station depending upon the alternative. The Chinatown Station under Alternatives 2 and 3A is within one block of the California Street cable car line and Alternative 3B Chinatown Station is located within one block of the Hyde Street cable car line. In addition, surface buses would remain to serve other destinations not directly served by the Central Subway.

Comment Form D



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
 Suite 400
 San Francisco,
 CA 94103-2479

Reception:
 415.558.6378

Fax:
 415.558.6409

Planning
 Information:
 415.558.6377

PUBLIC COMMENTS 公眾意見:

MY RECOMMENDATION IS TO PUT THE SUBWAY
 STATION AT 814-828 STOCKTON ST.

REASONS:
 1) NO TENANTS TO EVICT OR RELOCATE ON THIS SINGLE
 STORY COMMERCIAL
 2) 1 BUS WAY ON BOTH SIDES CLAY GOIN DOWN
 SACRAMENTO ST GOIN UP

D-1

請把我加入/保留在你的郵寄名單內。
 PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

NAME 姓名: Ron Lee
 MAILING ADDRESS 郵寄地址: 819 STOCKTON ST 2ND FLR
 PHONE NUMBER 電話號碼: 756-1898
 EMAIL ADDRESS 電郵地址: Rleeceedg@yahoo.com

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書面意見請郵寄到 Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103。截止日期 十二月十五日下午五時。書面意見及公聽會內發表的意見將在一個'意見及回應'的文件內作答。對補充報告有任何問題，請與規劃局 Joan A. Kugler 接洽，電話 415-575-6925。

Responses to Comment Form D

D-1

Comment recommending a Chinatown Station at 814-828 Stockton Street as studied in the SEIS/SEIR with no residents to relocate and bus transfer opportunities at Clay and Sacramento Streets is noted.

As stated in the SEIS/SEIR on pages 6-51 and 6-52, there are five ground-floor businesses on the 814-828 Stockton Street frontage of the building five small businesses/clubs along the backside on Hang Ah Alley that would be displaced and would need to be relocated. In addition, there appear to be one or two residential units in this building.

This station alternative would impact the Hang Ah Alley and Willie “Woo Woo” Wong Park to the east of 814-828 Stockton during construction and would cast shadows on the tennis court. The Recreation and Park Commission has stated a preference for the station alternative at Stockton and Washington Streets (see Letter AI, page 3-170).

Comment Form E



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Room 400
San Francisco,
CA 94103-2073

Location:
415.558.6222

Fax:
415.558.6803

Planning Information:
415.558.6377

PUBLIC COMMENTS 公眾意見:

*The two most important aspects of the Central
Subway for me are:*

*1) The straightest alignment possible so that Muni
will be able to operate Muni to proceed as fast
as possible along the route.*

*2) An easy to use underground pedestrian corridor
to be able to walk between the Union Square/Market
Street Station and the Powell Street Station.*

E-1

E-2

請把我加入/保留在你的聯名名單內

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

Michael WIEBRACHT

NAME 姓名

335 El Camino Real, Unit #205 Burlingame CA 94010

MAILING ADDRESS 電郵地址

650-343-3118

PHONE NUMBER 電話號碼

michael.wiebracht@gmail.com

EMAIL ADDRESS 電郵地址

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

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書面意見請寄到 Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103。截止日期：十二月十五日下午五時。書面意見及公聽會內發表的意見將在一個「意見及回應」的文件內作答。郵補充報告有任何問題，請與規劃局 Joan A. Kugler 聯絡，電話 415-575-6925。

Responses to Comment Form E

E-1

Comment noted. The Fourth/Stockton Alignment (Alternatives 3A and 3B) as described in the SEIS/SEIR on page 2-56 evolved as a more direct alignment that provided improved transit operations and a faster travel time than Alternative 2 along Third Street.

E-2

Comment noted. The underground pedestrian connection between the Union Square/Market Street Central Subway Station and the Powell Street BART/Muni Metro Station will be clearly marked to facilitate pedestrian movement between the two stations.

Comment Form F



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PUBLIC COMMENTS 公眾意見:

I AM AGAINST CHINATOWN SUBWAY PROJECT.
CHINATOWN IS A SMALL CROWDED NEIGHBORHOOD.
TO MAKE ROOM FOR A SUBWAY STATION,
SOME CHINATOWN PEOPLE AND BUSINESSES
MUST GO. THERE ARE BUSES SERVING
CHINATOWN: BUSES # 1, # 30, # 45 AND # 9.
STOCKTON STREET IS A VERY BUSY STREET
IN CHINATOWN. IF THERE MUST BE A SUBWAY
STATION IN CHINATOWN, I PREFER KEARNY STREET
WHICH IS LESS BUSY AND MORE ROOMY SPACIOUS.
THERE ARE PRO'S AND CON'S ABOUT MASS TRANSIT IN
CHINATOWN.

F-1

F-2

請把我加入/保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

JONATHAN LEONG

NAME 姓名

946 STOCKTON ST. # 140 SAN FRANCISCO, CA

MAILING ADDRESS 郵寄地址

(415) (433-7156)

PHONE NUMBER 電話號碼

EMAIL ADDRESS 電郵地址

94108

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

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Responses to Comment Form F

F-1

Comment noted. Commenter is opposed to the Central Subway Project because the Chinatown area is a small crowded neighborhood with existing bus service that serves Chinatown and states that the subway project is not needed and would cause relocation of residents and businesses.

F-2

Commenter prefers use of Kearny Street for the Central Subway project. The possible use of Kearny Street for the Central Subway alignment was discussed and studied during the period leading up to the 1998 EIS/EIR. Kearny Street was eliminated from consideration because the Community Advisory Group and Chinatown representatives preferred Stockton Street as the alignment and station location in Chinatown because it would serve the heart of Chinatown and the Union Square retail area. The public review process is documented in the “Design Options Screening Report Working Paper #2”, April 1997. Some 120 meetings attended by SFMTA between 1996 and 1997 with the Community and Technical Advisory Groups, the Planning Department, the Department of Parking and Traffic, and the Redevelopment Agency representatives (see Project Development History, SEIS/SEIR, page 2-54) narrowed the design options and eliminated the use of Kearny Street alignment alternatives from further study.

Comment Form G



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
 Suite 400
 San Francisco,
 CA 94103-2479

Reception:
 415.558.6378

Fax:
 415.558.6409

Planning
 Information:
 415.558.6377

PUBLIC COMMENTS 公眾意見:

*I support the Central Subway
 The church will be next to the planned
 sub station on Stockton/Washington.*

G-1

請把我加入/保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

CYNTHIA JOE (member of Presby. Church in Chinatown)

NAME 姓名
1526 FUNSTON AVE

MAILING ADDRESS 郵寄地址
(415) 681-3796

PHONE NUMBER 電話號碼
 EMAIL ADDRESS 電郵地址

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

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Responses to Comment Form G

G-1

Comment in support of the project adjacent to the Presbyterian Church is noted.

Letter H



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

October 30, 2007 二零零七年十月三十日

1650 Mission St
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information: -
415.558.6377

PUBLIC COMMENTS 公眾意見:

attached letter

請把我加入/保留在你的郵寄名單內：
PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

Sabina Chen, Executive Director
NAME 姓名
Chinese Culture Center, 750 Kearny St. 3rd floor, SF, CA
MAILING ADDRESS 郵寄地址
415-986-1822 Sabina@C-C-C.org
PHONE NUMBER 電話號碼 EMAIL ADDRESS 電郵地址 94108

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

關於這報告之公聽會將在 本年十一月十五日約下午一時半舉行，地點為市政廳 400 號室（請於週內致電 415-558-6422 查詢準確時間）。

Public comments will be accepted from October 17, 2007, to 5:00 p.m. on December 10, 2007. Written comments should be addressed to Bill Wyclo, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. Comments received at the public hearing and in writing will be responded to in a Comments and Responses document. If you have any questions about the environmental review of the proposed project, please call Joan A. Kugler at 575-6925.

書面意見請郵寄到 Bill Wyclo, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103。截止日期：十二月十五日下午五時。書面意見及公聽會內發表的意見將在一個「意見及回應」的文件內作答。對補充報告有任何問題，請與規劃局 Joan A. Kugler 接洽，電話 415-575-6925。



舊金山中華文化基金會

CHINESE CULTURE FOUNDATION OF SAN FRANCISCO
750 Kearny Street, 3rd Floor
SAN FRANCISCO, CA 94108-1809

November 8, 2007

Mr. Dwight S. Alexander, President
San Francisco Planning Commission
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Mr. Nathaniel Ford
Executive Director
San Francisco Municipal Transportation Agency
1 South Van Ness Avenue, 7th Floor
San Francisco, CA 94103

RE: Public Arts in Central Subway Project

Dear Mr. Alexander and Mr. Ford:

The Chinese Culture Foundation has been in the Chinese community for 34 years, and has had a long history of serving the artistic and cultural needs of the community. We appreciate the opportunity to review the Draft SEIR/SEIS on the Central Subway Project, but find it very difficult and impractical to thoroughly review, and hence impossible to provide you with a thorough and comprehensive response. We do, however, have some points that we want to share with you.

First of all, we would like to reiterate our strong support of the project, and see it as essential to the future social and economic vitality of the Chinatown Community. At the same time, we want to reiterate the absolute necessity for our continued inclusion and involvement in the decision making process, in light of the very serious project impacts, as well as the residential and business displacement, that may occur.

H-1

We concur with the findings of the report in terms of the need for the project and feel that the Chinatown Community has been severely underserved by Muni's current bus service. We can anticipate that the engineering and construction costs will be great, and that the overwhelming proportion of resources will be used for those efforts, but we feel strongly that adequate funds should be directed to addressing the relocation needs of both residents and businesses, and that replacement housing is provided.

H-2

In the construction of the Chinatown Central Subway Station, we urge you consider the funding of public art that is culturally sensitive and relevant to the surrounding Chinatown community. As this station will be the central transit stop and vital to the residents and visitors of Chinatown, we are concerned that the aesthetics of the station and surrounding area be reflective and representative of this community.

H-3

As 2% of construction costs for the Central Subway are designated towards public arts, the Chinese Culture Foundation requests the Planning Commission and MTA ensure that the public art in the Chinatown Central Subway Station will be culturally appropriate by designating funding towards community engagement in the selection of these public arts.

The San Francisco Arts Commission has already agreed to partner with CCF to provide access to the Chinatown community, translation services, technical and cultural assistance, and community forums on the process of selecting public arts. We ask that this process be as transparent as possible, engaging as much community input as needed. Chinatown is our home; the Central Subway Station will be a prominent landmark. The station and surrounding areas should be a public area that this community will be proud to call home.

We would like to conclude our comments by once again voicing our strong support for the Central Subway project. At the same time, we urge you to support adequate process for community input in the design and public art components of the Central Subway.

Sincerely,



Sabina Chen
Executive Director

H-3
Cont.

Responses to Letter H

H-1

Commenter strongly supports the project and wishes to continue their inclusion in the decision making process.

See SEIS/SEIR, pages 11-5 to 11-9, for a discussion of past community outreach and page 2-64 for discussion of the future project approval process.

H-2

Comment expressed need for adequate funds to be directed to addressing the relocation needs of both residents and businesses and for replacement housing. See Response to Comment A-4, and SEIS/SEIR, Section 6.5.2, Acquisition and Displacement, for a summary of the notification process for residents and businesses. Minimum relocation payments are set by law and include moving and search expense payments for businesses. Affordable housing could also be part of transit-oriented station development in Chinatown. This would be the subject of an independent environmental analysis.

H-3

A representative of the San Francisco Arts Commission has been part of the community meetings held in Chinatown and at the Community Advisory Group for the Central Subway Project for purposes of describing the Arts Program for the stations. Two percent of the eligible construction costs would be set aside for the arts for the subway project. The City's Administrative Code requires that all capital improvement projects allocate two percent of eligible construction costs for public art programming. The Arts Commission's Public Arts Program is responsible for management of the public arts funding and selection of artists and art, working in close coordination with local communities. SFMTA has also retained the services of CCDC to ensure the continued involvement of the Chinatown community in the project development and design. Meetings will be held in Chinatown to determine the art treatment of the station and community artists have been solicited to participate in the program in a February 2008 Call for Artists information sheet.

Letter I

From: Lee Goodin [mailto:lgoodin1@mindspring.com]
Sent: Monday, November 19, 2007 8:51 AM
To: Subway, Central
Subject: RE: Central Subway Draft Supplemental Environmental Impact Report

RE: Central Subway Draft Supplemental Environmental Impact Report

Areas of concern

1. The three alternatives listed are only subway alternatives and "No Project/TSM Alternative". This money could be used to finance an above ground alternative as recommended by Regional Alliance For Transit (RAFT) | I-1
2. The following is referred to a number of times: "Transit Preferential Streets (TPS) Improvements - Areas identified for TPS are Stockton Street/Columbus Avenue and Market Street." The map indicates the intersection of Stockton and Columbus as a nexus for these improvements, however there does not appear to be any additional information on these TPS programs. | I-2
3. The MTA established a Community Advisory Group (CAG) early in the planning process to provide input to the identification and selection of design options for the Third Street Light Rail Project and to help select the options to carry forward for environmental review. The CAG is composed of a broad cross-section of stakeholder groups from the six primary neighborhoods in the Third Street Corridor: Visitation Valley, Bayview/Hunters Point, Potrero Hill, South of Market, and Chinatown/Downtown. The CAG has met six times since December of 2003 to discuss the Central Subway phase of the Project. Question: Why is there no North Beach/Telegraph Hill neighborhood representation on the CAG? | I-3
4. In the Area Plan Boundaries there is no account made for the North Beach neighborhood, see Figure 4-1. Yet the plan clearly indicates the subway will continue through North Beach in 3 of the 4 alternatives. | I-4
5. The Waterfront Land Use Plan, BCDC, SF Bay Plan and SF Waterfront Special Area Plan, while important all seem to have limited relevance to the area in which the Central Subway is planned. The amount of space dedicated to this section doesn't seem justified as nothing of consequence is concluded. | I-5
6. Page 39, Washington Square: "*Washington Square Park includes several mature trees, some along Columbus Avenue. To date, none of these trees have been designated by the City as historic landmark trees.*" Why point out that these trees in the park are not protected? Are these trees going to be sacrificed? | I-6
7. Page 50: "At the TBM retrieval shaft in Columbus Avenue at Washington Square, the roadway (originally Montgomery Avenue) was cut through between 1873 and 1875, bisecting Washington Square. Deposits related to the early years of Washington Square as a public space and park may be present." Question: What is | I-7

the environmental impact of this?

8. Page 70: "Washington Square Park and the associated Washington Square Park Triangle are the only properties in close proximity to the Tunnel Boring Machine extraction shaft that would be placed in the middle lanes of Columbus Avenue between Union and Powell Streets for the Alternative 3A and 3B Alignments (see Table 4-15)." There are other properties – residential and commercial - in close proximity to the extraction pit. How long will this disruption last? These properties and the Park will be next to and seriously effected by the extraction pit and resulting dirt, dust and noise pollution.

I-8

9. Page 110, "North Beach Tunnel Construction Variant - Chinatown to Vicinity of Washington Square" section: "Chemical compounds that may be present in soil and groundwater along the North Beach Construction Variant may include, but not be limited to, petroleum hydrocarbon compounds and fuel-related volatile organic compounds (VOCs), such as benzene; other VOCs, such as de-greasers and thinners; and various metals (likely present in fill). At four LUST sites (766 Vallejo Street, 1625 Powell Street, 1636 Powell Street, and 1641 Powell Street), the regulatory database and review of DPH files indicated that subsurface soil and groundwater were impacted with fuel-related VOCs, total petroleum hydrocarbons (TPH) as gasoline, diesel, and motor oil." Question: Could these contaminants result in the project becoming a "Super Fund Site" requiring a major clean-up that could take years to resolve? Question; Why is there no discussion of the environmental consequences of the Tunnel Boring Machine being extracted at Washington Square?.

I-9

10. The table in page 135 does not reflect the higher noise level when the Tunnel Boring Machine is extracted at Washington Square Park.

I-10

11. There is no discussion in the Environmental Sections of the dirt that will be pushed out next to Washington Square, what portions of the street would be closed and for how long, what impact will the extraction pit have on traffic, what the impact will be on the residential and commercial life of the neighborhood, how the equipment will be removed, how and where the dirt from the extraction pit will be handled, how many people would be working there and what debris might be cast off by the construction in that area.

I-11

12. "Construction of a TBM retrieval shaft near Washington Square park for the North Beach Tunnel Construction Variant would require the temporary relocation of bus stops for the 30-Stockton and 45-Union/Stockton lines, along Columbus Avenue between Union and Powell Streets. This construction approach would require the closure of one side of the street while the shaft is excavated, keeping one travel lane in each direction, and then switching over to the other side of the street to complete the shaft. This shift in traffic lanes may also require the temporary relocation of overhead wires on the 30-Stockton and 45-Union/Stockton to accommodate continued transit operations. This construction activity is estimated to take six months, at which point the shaft would be covered and normal street operations would be restored. If the North Beach Tunnel Construction Variant is not approved, the TBM

I-12

extraction shaft would be at the Chinatown off-street station site and would last approximately one week. Trucks and cranes would occupy the nearside curb parking lane to haul materials and load the TBM." Question: What will the economic and social impacts be of a disruption of this magnitude be over a period of six months?

I-12
Cont.

13. Page 38: "This Alternative would generate an estimated 18 truck trips per day during the 2.5 year excavation of the guideway, 13 truck trips during the two-year excavation period for the Moscone Station, and 7 truck trips per day for the excavation of the Union Square/Market Street Station (3.0 year construction period) and the Chinatown Station (2.5 year construction period) associated with soils excavation and backfill." Question: How many truck trips will be needed for the extraction pit at Washington Square?

I-13

14. Page 71: "The TBM retrieval shaft in Columbus Avenue is within the original boundary of Washington Square as laid out in 1848 and until Columbus Avenue cut through it in about 1873; deposits associated with the park may be present beneath the roadway."

Question: What impact will the possible uncovering of archeological site or relics have?

I-14

15. Page 78: "There would be no vibration impacts to the park and visual impacts would be limited to the duration of construction and would not substantially impact park use or historic integrity. Five additional properties, considered contributors to the proposed Washington Square Historic District, are located within 200 feet of the extraction shaft. The buildings include 1636-1656 Powell Street, 575-579 Columbus Street, 1731-1741 Powell Street, 1717-1719 Powell Street, and 1701-1711 Powell Street. Because of the distances from the extraction shaft and the temporary nature of construction activity, there would not be vibration impacts to any of the historic buildings."

I-15

This discussion appears to be overly optimistic. If there is a substantial amount of earth being removed very close to the surface in the middle of street adjacent to these buildings they will experience vibration.

16. Map page 46: Map appears to indicate that there would more buildings/lots affected by the TBM extraction than listed.

I-16

17. Pages 83 and 87: The traffic alternatives for North Beach are not detailed enough and do not appear to be realistic given that Columbus is bumper to bumper during rush hours.

I-17

Summary:

- This EIR doesn't give complete coverage to the impacts to and on North Beach and specifically Washington Square Park.

I-18

- Washington Square is an historic area and a much used park - the Environment Section does not cover the impacts in detail but instead complete avoids any discussion.

- Extracting the Tunnel Boring Machine (TBM) logically will be noisier and environmentally impacting than when it is deep below the ground. The anticipated noise levels and vibration appear to be underestimated and not realistic.
- Other alternative extraction locations should be discussed and considered.
- The economic and social impacts on the North Beach neighborhood have not been adequately addressed.
- North Beach needs to be represented on the Community Advisory Group (CAG).
- Washington Square does not appear to be the right choice for the location of the extraction pit.

I-18
Cont.

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415 346-4335
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Responses to Letter I

I-1

A surface alternative was evaluated as part of the screening process prior to the preparation of the Draft SEIS/SEIR. This alternative was rejected because it would increase surface congestion, particularly along Stockton Street, and would not improve service reliability and travel times, as set forward in the project Purpose and Need.

The third paragraph, page 2-57 of the SEIS/SEIR, is modified as follows to further explain the screening of the surface alternative:

“Subsequent to the Scoping Process, an updated Project construction cost estimate was prepared that exceeded the proposed budget for the Project. A panel of construction experts working with the Project design team undertook a cost reduction analysis to identify ways of reducing the cost of the Project without compromising its overall purpose and need. Surface alternatives along Third, Fourth, and Stockton Streets and continuing north to Fisherman’s Wharf were evaluated as part of this process, but were rejected from further evaluation in the Draft SEIS/SEIR because they had fewer benefits in terms of service reliability and greater impacts on parking and traffic. Though the capital costs were less for a surface alternative than for a subway alternative, the surface alternatives only minimally met the project purpose and need and resulted in higher operation and maintenance costs.¹

In response to public input during Scoping and recommendations from the cost reduction effort, a new option for the Fourth/Stockton Alignment design was identified. The original Fourth/Stockton Alignment was designated Option A (LPA) and a modified Fourth/Stockton Alignment, described below, was designated as Option B (Modified LPA). The changes incorporated into the Option B (Modified LPA) Alternative are summarized below.”

¹ PB/Wong for Muni, FINAL DRAFT, Task 1.72-01, Conceptual Alternative Downtown Rail Alignment Study Volume 1, Summary Report, Revision Oc, March 20,2006.

I-2

The Stockton/Fourth Street Transit Preferential Streets (TPS) project, as identified in the SFMTA 2005/2006 Short Range Transit Plan, called for the extension of a Stockton-Fourth Street Transit Lane

from Stockton and O'Farrell Streets across Market Street to Fourth and Clementina Streets, providing a continuous transit lane from the south end of the Stockton tunnel. This project was completed in 2004 and facilitates the surface flow of Muni buses. Further information on TPS is available in the SFMTA *Short Range Transit Plan*.

I-3

The project boundary is Jackson Street, which is located in Chinatown. The Community Advisory Group (CAG), which was originally created for the Third Street Light Rail Project, did not initially include any project activities that extended into the North Beach neighborhood. In 2006, a construction variant for extraction of the Tunnel Boring Machine (TBM) extending into North Beach via Columbus Avenue was added to Alternative 3A and 3B. Since that occurred, SFMTA has met with representatives from the Telegraph Hill Dwellers and RENEWSF to discuss this proposal. In addition, the CAG has recommended the addition of a representative from the North Beach area and SFMTA is in the process of soliciting that representation.

I-4

The Area Plan boundaries in Figure 4-1 reflect the boundaries of those six neighborhoods that have a specific Area Plan adopted as part of the San Francisco Planning Department General Plan (see discussion starting on page 4-3 of the SEIS/SEIR). A specific Area Plan has not been prepared for North Beach and therefore it is not depicted on this figure.

I-5

The *Waterfront Land Use Plan* and BCDC's *San Francisco Bay Plan* and *San Francisco Waterfront Special Area Plan* are mentioned in the Plans and Policies section as they are relevant to the service area impacted by the No Project/TSM Alternative and all of the Build Alternatives. The No Project/TSM Alternative would continue to have surface rail operations on The Embarcadero, which falls under the scope of the *Waterfront Land Use Plan* and the BCDC plans. In addition, the eastern *Waterfront Land Use Plan* boundary extends to Third and King Streets, which falls within the study area for all Build Alternatives.

I-6

As discussed in the SEIS/SEIR in Section 6.12, the mature trees within Washington Square Park and along the western edge of the park would not be impacted by construction of the Tunnel Boring Machine extraction pit that would be located in the middle two lanes of Columbus Avenue. Consistent with the Urban Forestry Ordinance, Article 16, San Francisco Public Works Code, the small street trees in the

median of the street do not meet the definition of a significant tree and would be removed and replaced at a 1:1 ratio following construction (see Biology, page 6-99, in the SEIS/SEIR). A certified arborist would be present during construction of the TMB retrieval shaft to monitor protection of tree roots during excavation.

I-7

Page 4-50 of the SEIS/SEIR documents the existing archaeological conditions of the study area, specifically along Columbus Avenue. The reference cited by the commenter goes on to say, “Due to the depth of the tunnel at this location, the only potential historical archaeological resources that may be encountered are artifacts from filled wells.” Mitigation measures for archaeological resources encountered during construction of the project are described in Chapter 6.0 Construction Methods, Impacts, and Mitigation on pages 6-61 thru 6-67 and would be responsive to both City and Federal guidelines and laws for recovery and documentation of resources. Archaeological impacts for the TBM shaft along Columbus Avenue are identified as moderately sensitive for Alternative 3A and 3B for the presence of historical park remains from 1840-1873 (see pages 6-69 and 6-71 of the SEIS/SEIR). Federal and state guidelines require that undertakings subject to environmental review address potential effects to archaeological resources. Under State environmental laws, a project that may have an adverse effect on a significant archaeological resource is a project that may have a significant effect on the environment.

I-8

Page 4-70 of the SEIS/SEIR describes the existing cultural resources that would be potentially impacted by the Central Subway Project. Washington Square Park and the associated Washington Square Park Triangle are the only historic architectural resources that are located in proximity to the TBM extraction shaft. As noted on pages 6-26 (Section 6.2.2) and 6-33 (Section 6.2.3) of the SEIS/SEIR, which describe the construction process for Alternatives 3A and 3B, respectively, the construction of the TBM excavation shaft on Columbus Avenue would take approximately six months and retrieval of the TBM would take about one week. During the construction period, businesses and residences in the immediate vicinity would be subject to construction-related impacts, such as traffic, noise, dust, and vibration. The impacts related to the North Beach Construction Variant are discussed in Construction Impacts Sections 6.3 through 6.15 in the SEIS/SEIR.

I-9

Page 4-110 of the SEIS/SEIR describes the existing hazardous material conditions that would be potentially impacted by the Central Subway Project. The construction-related hazardous material impacts are summarized in Section 6.13 on pages 6-108 and 6-109. As noted in the mitigation measures for

Alternative 3A and 3B, the North Beach Construction Variant would require an additional sampling work plan to be completed as part of the Soil Quality Investigation for the segment of Stockton Street between Jackson and Green Streets and for Columbus Avenue from Green Street to just north of Union Street. This investigation would be required to meet the requirements of Article 20 of the San Francisco Municipal Code. The findings of the soils investigation would be included in a Soils Analysis Report and Site Mitigation Report according to the Article 20 guidelines. A groundwater investigation in conformance with the state and local guidelines and requirements would also be conducted in conjunction with the soil investigation.

I-10

Table 4-32 on page 4-136 of the SEIS/SEIR describes the current noise levels along the Central Subway Corridor and therefore does not reflect any project-related noise. Table 6-3 on page 6-115 of the SEIS/SEIR identifies the range of noise expected from construction-related activities along the project corridor. As shown on page 6-115 of the document, temporary construction noise would be expected to be in the range of 85 to 89 decibels, while ambient noise level ranges from 71 to 74 decibels. A series of mitigation measures, including preparation of a Noise Control Plan, are outlined on page 6-117 to 6-118 to minimize noise disruption during construction and reduce noise impacts to a less-than-significant level. The extraction of the TBM is expected to last approximately one week, a temporary impact.

I-11

All construction impacts including those for the North Beach Construction Variant are summarized in Chapter 6.0. As noted on page 6-38 of the SEIS/SEIR, the construction of the TBM removal shaft in North Beach would take approximately six months to construct and one week would be required for the extraction of the TBM(s). During the six month period, the number of traffic lanes on Columbus Avenue would be reduced to just one lane in each direction and would be shifted to avoid the area under construction. This would also require shifting of the overhead wires for the 30-Stockton, 41-Union, and 45-Union/Stockton trolley bus lines and temporary relocation of bus stops. Temporary rerouting of traffic may be required as noted on Figure E-12. In addition to these circulation impacts, neighbors of the construction site would be impacted by noise, vibration, and dust during construction activities. The construction impacts and related mitigation measures to minimize air, dust, and noise impacts are outlined in Sections 6.14 and 6.15 of the SEIS/SEIR.

The construction shaft at Washington Square would not be used for the removal of muck from the tunnel excavation. Disposal of excavated materials from the tunnel construction (station excavation will be at each station) would occur at the portal at the south end of the subway tunnel (Fourth and Brannan for

Alternative 3B). The excavation of muck for the TBM extraction shaft itself would last about three months and is expected to generate approximately five truck trips per day during that period. Contaminated soil would be off-hauled to a treatment facility south of San Francisco while clean fill may be distributed to construction sites within the city, as needed.

I-12

The SFMTA would be required to maintain public access to all properties during the construction phase and to minimize social and economic impacts associated with construction activities and the potential disruption of business access. As stated in Section 6.5 of the SEIS/SEIR, no property takes are required for construction of the North Beach Construction Variant, but an easement under a parcel located at 1455 Stockton Street would be required. SFMTA would act in accordance with all existing federal and state regulations and guidelines to minimize disruption to affected property and business owners and residents during the construction phase.

I-13

As stated in Response to Comment I-11, an estimated five truck trips per day would be associated with the off-hauling of excavated materials associated with the TBM extraction shaft in North Beach. Other truck trips associated with muck removal for the tunnel would be off-hauled from the construction shaft at the beginning of the TBM tunnel at Fourth Street between Bryant and Harrison Streets. A limited number of truck trips would be generated in Washington Square during the one week period when the TBM is removed from the site.

I-14

See response to comment I-7 above.

I-15

Section 6.15 of the SEIS/SEIR describes noise and vibration impacts and mitigation measures during the temporary construction of the project. Potential for an adverse effect from construction vibration is controlled by adhering to vibration limits for settlement of structures and requiring monitoring to assure that vibration is within specified limits during construction activities. Mitigation measures are described on pages 6-117 to 6-119. The maximum peak particle vibration (PPV) velocity level, in any direction, at any of the historic structures along the corridor should not exceed 0.12 inches/second for any length of time. Periodic vibration monitoring at the closest structure to any construction activities would be required; construction would be halted if vibration levels exceed the 0.12 inches/second threshold level

and different construction equipment or procedures would be implemented to reduce vibration levels to less-than-significant.

I-16

It is not clear to which figure the commenter is referring. The potential historic architectural structures in the North Beach, Washington Square, and Powell Street Historic Districts that would potentially be affected by the construction of the North Beach Construction Variant are discussed on page 4-69 through 4-75 of the SEIS/SEIR. The boundaries of the Historic Districts are outlined on Figure 4-5, page 4-54 of the SEIS/SEIR.

I-17

The detour routes included in Appendix E of the SEIS/SEIR have been prepared by the Department of Parking and Traffic (DPT) and are based on the preliminary engineering information for each alternative. Once an alternative is selected and the project moves into the final design phase, SFMTA would select the most appropriate detour routes and develop temporary transportation system management measures along these routes, e.g. additions of turn lanes at key intersections, conversion of parking lanes into peak period travel lanes, etc. Detour routes would be advertised prior to construction in the appropriate media. When construction detours are implemented, traffic control police would monitor critical locations along the detours to promote uncongested traffic flow. Traffic detours would also be coordinated with other construction projects in the vicinity (see page 6-37 of the SEIS/SEIR).

I-18

Impacts to Washington Square from the temporary construction of the TMB extraction shaft are discussed in the SEIS/SEIR in Section 6.0 under biology, cultural resources, noise and vibration. Impacts are described as less-than-significant with mitigation measures. The construction of the TMB shaft on Columbus Avenue is estimated to take about six months and the extraction of the TBM would take about one week (page 6-26). This is considered a short-term, construction related, temporary impact that would be less-than-significant. Information about the construction activity and schedule would be posted in the Washington Square Park area and would be provided to businesses and residents around the square, and to park users prior to construction. See Response to Comments I-3 through I-17 above for detailed responses.

Letter J



RECEIVED
DEC 03 2007
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A United Way Agency

November 27, 2007

Mr. Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
Central Subway Draft SEIS/SEIR
1650 Mission Street, Suite 400
San Francisco, CA 94110

Dear Mr. Wycko,

CYC is pleased to write this letter in support of the Central Subway Project and how it will affect the lives of residents in the Chinatown and North Beach/Telegraph Hill areas.

Ever since the earthquake in 1989 closed down the freeway ramp leading into Chinatown, the community has suffered in numerous ways. This project will be vital in reconnecting the community with the rest of the city. Once complete, the project will improve service reliability and travel times, enhance transit connections, and provide economic opportunities and access to jobs for residents in the area.

Additionally, this critical transportation improvement will link other neighborhoods with high Asian populations to Chinatown, thereby improving and strengthening community connections between Visitacion Valley and Chinatown. This is especially critical for CYC in that many of our youth participants are residents of underserved neighborhoods such as Visitacion Valley and deserve a safe and accessible transportation system that will enable them to travel to CYC without fear or anxiety.

After nearly 20 years of advocacy and organizing by the Chinatown community, we strongly believe it is time to address the needs and demands of our community and end the isolation they have had to endure for two decades. We also believe that once this project is completed, Central Subway, other existing bus services such as the 9X, 30, and 45 lines should not be eliminated or reduced in services. The elimination of the 15 has created insurmountable inconveniences to residents in Chinatown and North Beach/Telegraph Hill and we do not want see a repeat at the completion of this project.

Thank you for your attention and consideration in support of this important project.

Sincerely,

Sarah Wan
Executive Director

J-1

J-2

Responses to Letter J

J-1

Statement in support of the project is noted.

J-2

As noted on pages 3-36 and 3-37 of the SEIS/SEIR bus service on the 30-Stockton, 45-Union/Stockton, and 9X/9AX/BX-San Bruno would continue once the Central Subway is completed. Elimination of these lines is not contemplated at this time. The implementation of rail service on the Central Subway would provide an opportunity to adjust headways on surface bus lines as numerous long-distance passengers shift to the Central Subway. In addition, the 22-Fillmore line is planned to be extended into Mission Bay to supplement surface bus operations (see page 3-10).

Comment Form K



**SAN FRANCISCO
PLANNING DEPARTMENT**

PUBLIC COMMENTS 公眾意見:

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EMAIL ADDRESS 電郵地址: winchellg@sbglobal.net

Public comments will be accepted from October 17, 2007, to 5:00 p.m. on December 10, 2007. Written comments should be addressed to Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. Comments received at the public hearing and in writing will be responded to in a Comments and Responses document. If you have any questions about the environmental review of the proposed project, please call Joan A. Kugler at 575-6925.

書面意見請郵寄到 Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103。截止日期: 十二月十五日下午五時。書面意見及公聽會內發表的意見將在一個'意見及回應'的文件內作答。對補充報告有任何問題, 請與規劃局 Joan A. Kugler 接洽, 電話 415-575-6925。



**SAN FRANCISCO
PLANNING DEPARTMENT**

PUBLIC COMMENTS 公眾意見:

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fac:
415.558.6409

Planning
Information:
415.558.6377

K-1

K-2

K-3

(shots)
 My concerns are the vents right next to our church
 property - how large are they, is there constant noise that
 comes from the vents? pollution?
 Another concern is the fire opening for the subway - will
 there be several entrance/exits in case of emergencies -
 where people can exit quickly?
 Will the Methodist Church be affected by the shadow
 of a possible 6-story building? (on the corner of Wash +
 Stockton?)

請把我加入/保留在你的郵寄名單內:
 PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

NAME 姓名 _____

MAILING ADDRESS 郵寄地址 _____

PHONE NUMBER 電話號碼 _____ EMAIL ADDRESS 電郵地址 _____

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Responses to Comment Form K

K-1

As stated on page 5-79 of the SEIS/SEIR, potential noise levels from vent shafts would be from the passby of underground trains transmitting noise through the vent shaft and the monthly testing of emergency ventilation fans. For the most part, the train passby noise would be barely audible over background noise. The vent shafts would be designed to meet noise level limits of the San Francisco noise ordinance and would not have significant adverse impacts to adjacent properties. Specific measures for the abatement of noise from the vent shafts would be determined during final design. Testing of the emergency ventilation fans could be restricted during the times that Church services are being held (see Mitigation Measures, page 5-83 of the SEIS/SEIR). Churches fall under Category 3 for FTA noise criteria for a 1-hour Leq (equivalent sound level) with moderate impacts at 70 Leq, and the existing noise measurements at Stockton and Sacramento Streets show a noise level of 72 Leq (Table 4-32 on page 4-136 of the SEIS/SEIR). Mitigation measures to minimize the noise and vibration impacts associated with the general operation of the train are outlined on pages 5-83 and 5-85 of the SEIS/SEIR.

K-2

An emergency exit would be located between Washington and Jackson Streets, on the west sidewalk of Stockton Street for Alternative 3B, as shown on Figure 2-22, page 2-46 of the SEIS/SEIR.

K-3

Shadow analysis is required for public parks and for the reduction of shadows on certain public or publicly accessible open spaces in San Francisco, under Section 295 (Proposition K) and Section 147 of the San Francisco Planning Code. For public or publicly accessible open spaces, the amount of area shadowed, the duration of the shadow, and the importance of sunlight to the type of open space being shadowed for buildings over 50 feet high needs to be described. A preliminary shadow analysis has been conducted for the station building outline (assuming maximum height and bulk) at Stockton and Washington Streets to show the maximum new shadows on the Gordon Lau Elementary School schoolyard, the Methodist Church across Washington Street, from the proposed station and the adjacent Presbyterian Church on Stockton Street. (See Appendix K of the SEIS/SEIR). Shadows on the south wall of the Methodist Church, from the proposed Chinatown Station, would occur in the morning and early afternoon hours during winter months (December 21), but not during other times of day or months of the year. The playground of the Gordon Lau Elementary School is currently shaded by adjacent buildings and the school itself during all months of the year. Additional shading from the proposed Chinatown station building and vent shaft would occur on the eastern edge of the school playground in

the morning hours and at noon during all seasons of the year and during the winter months (December 21) in the afternoon. There would be no additional shadows cast on the Presbyterian Church from the proposed Chinatown Station based on the preliminary analysis.

Letter L



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

December 4, 2007

RECEIVED

DEC 07 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Joan A. Kugler
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94105

Subject: Central Subway Draft SEIS/SEIR
SCH#: 1996102097

Dear Joan A. Kugler:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on December 3, 2007, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

L-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 1996102097
Project Title Central Subway Draft SEIS/SEIR
Lead Agency San Francisco Planning Department

Type SIR Supplemental EIR
Description The Central Subway to Chinatown is Phase 2 of the Third Street Light Rail Project that would extend light rail for 1.7 miles on a surface/subway alignment from the current terminus at Fourth and King Streets to Jackson Street in Chinatown. Under the Locally Preferred Alternative, the rail would operate on the surface from Fourth and King Streets to a portal between Townsend and Brannan Streets where it would transition to subway operations. There would be three subway stations: Moscone, Union Square/Market Street, and Chinatown. Other alternatives would include one surface station and a split Union Square and Market Street station.

Lead Agency Contact

Name Joan A. Kugler
Agency San Francisco Planning Department
Phone (415) 575-8925 **Fax**
email
Address 1650 Mission Street, Suite 400
City San Francisco **State** CA **Zip** 94105

Project Location

County San Francisco
City San Francisco
Region
Cross Streets Third/Fourth St. between King & Market St. and Jackson St.; Stockton St. between Market and Jack
Parcel No. Constructed in public right-of-way, except for station areas to be determined.
Township

	Range	Section	Base

Proximity to:

Highways Hwy. 101, I-280, I-80
Airports
Railways Caltrain, BART, Muni Metro
Waterways San Francisco Bay
Schools Multiple: SF Community College, Academy of Art, Chinese Central, etc
Land Use Industrial, Downtown Commercial District, Public/Open Space, Multi-Family Residential, and Mixed Use. Segments of the rail corridor traverse areas governed by the South of Market, East SOMA, Downtown, and Chinatown Area Plans.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wildlife; Landuse; Growth Inducing; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 3; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; San Francisco Bay Conservation and Development Commission; California Highway Patrol; Caltrans, District 4; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 2; State Water Resources Control Board, Clean Water Program; Air Resources Board, Transportation Projects

Date Received 10/18/2007 **Start of Review** 10/18/2007 **End of Review** 12/03/2007

Responses to Letter L

L-1

This letter confirms procedural compliance with the State Clearinghouse environmental review. There were no comments from State reviewing agencies.

Letter M

Chinatown Transportation Research and Improvement Project
c/o 838 Grant Avenue, Suite #414
San Francisco, CA 94108

Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
Central Subway Draft SEIS/SEIR
1650 Mission Street, Suite 400
San Francisco, CA 94103
December 7, 2007



Dear Mr. Wycko,

Chinatown TRIP has been advocating for the transportation needs of the Chinatown community for over 30 years. Bringing together community residents, engineers, and planners, our committee has been at the forefront of analyzing and proposing solutions to the transportation problems our community faces. Over the years, this has led to the establishment of bus routes, increased bus frequency, safer crosswalks for pedestrians, and advocacy to build the Central Subway.

We strongly support the Central Subway Project. In particular, we endorse Alternative Three, Option B for the Locally Preferred Alternative with the Chinatown Station located at the intersection of Washington and Jackson Streets. We have three primary concerns with regard to the Draft SEIS/SEIR:

- Traffic flow during construction needs to be detailed and we find the maps in the SEIS/SEIR incomplete and difficult to understand. We would like to see a traffic flow and management plan from DPT well in advance of the start of construction.
- Signage in English and Chinese to notify community members of changes in transit during and after construction.
- Development of a second portal to the Chinatown Station at the lower level commercial plaza at the Mandarin Tower site (southeast corner of Stockton Street and Washington Street). The sidewalks in Chinatown are narrow and congested and it will be difficult for all SFMTA riders to enter and exit from a single portal. It is necessary to disperse pedestrian traffic volume and minimize pedestrian conflicts on the narrow Stockton Street Corridor.

Finally, Chinatown TRIP encourages community and merchant participation in developing construction activity and traffic flow guidelines to minimize negative impacts and disruptions to the community.

Sincerely,

Harvey Louie
Chinatown TRIP President

M-1

M-2

M-3

M-4

M-5

Responses to Letter M

M-1

Chinatown TRIP's support of the Central Subway Project and endorsement of Alternative 3B as the Locally Preferred Alternative is noted.

M-2

Refer to Response to Comment I-17. A more detailed traffic flow plan would be prepared once an alternative is selected and the project advances into the final design phase.

M-3

The SFMTA has been conducting an extensive community outreach effort as summarized in Chapter 11.0 Coordination and Consultation. As indicated on page 5-12, this effort will continue through the project implementation phase. Signage will be provided in both English and Chinese on all public notices and signage posted for project meetings and construction notices.

The following text is added at the end of the third paragraph of page 6-35:

“MTA will provide signing related to transit changes in Chinese as well as English.”

The following Transit Improvement Measure (#3) is added to Table 7-2, page 7-9:

“3. MTA will provide signing related to transit changes in Chinese as well as English.”

M-4

The request for a second entry to the Chinatown station at the lower level of the Mandarin Towers was considered, but is outside of the budgeted project cost estimate. The pedestrian level of service analysis (see Table 3-17, pages 3-66 and 3-67 of the SEIS/SEIR) has shown that the planned station entrance is sufficient to meet pedestrian demand.

M-5

SFMTA has retained the services of the CCDC for assistance in the planning and implementation of the project in Chinatown. SFMTA is committed to including the Chinatown community in planning for construction to minimize adverse impacts to the neighborhood and community over the five to six-year construction period.

Letter N

December 10, 2007

Dear Mr. Bill Wycko,



Chinatown Community
Development Center

I am writing this letter to provide a Chinatown community perspective on section 5.4.3 – 華協中心 Historical Architectural Resource Impacts – of the Central Subway Draft Supplemental Environmental Impact Statement/ Supplemental Environmental Impact Report. I have consulted with the Chinese Historical Society of American and local architectural historian, Phil Choy to flesh out the content of this letter.

In 1986, San Francisco City Planning did not approve a proposal for a Chinatown Historic District, so it is peculiar that the mere eligibility of the neighborhood holds so much weight. There is an inherent contradiction between the local planning process and the National Register of Historic Places (NRHP) process.

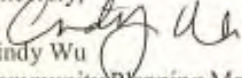
Concerning the assertion that demolition of either 814-828 Stockton Street or 933-949 Stockton Street would constitute an adverse effect to Chinatown's eligibility as a NRHP historic district, we would like to take a more nuanced look at the intent of historic preservation.

Chinatown's historical importance is founded in that fact that it is the oldest ethnic community in San Francisco. The spirit of the people who reside in the community preserve their history of immigration and ensuing development of a cross cultural identity. The daily activities and interactions of the people of Chinatown represent the historic nature of the neighborhood. In the late 1800s and early 1900s, the evolution of a "Chinese" architecture was ornaments that were added to buildings so that Chinese people could claim a place in San Francisco. It was a response to a negative reaction to Chinese immigrants from the population that lived in Chinatown at the time. This history is detailed in the 1986 proposal submitted to the San Francisco City Planning department.

The actual architecture of the buildings in Chinatown may be rather mediocre, but the history, the timeline of what happened on those sites is important. That history is not encapsulated in the buildings that are on the site right now, and would not necessarily be lost if those buildings were demolished. Present day Chinatown was not built on its architectural merits, but on the socio-political strategy that influenced architectural decoration. Why and how it happened was more important than the actual architecture or ornamentation itself.

In our opinion, demolition of either 814-828 Stockton Street or 933-949 Stockton Street does not in and of itself adversely impact the historical value of the neighborhood. There are 371 buildings that have been identified as contributors to the potential Chinatown Historic District, and the loss of either building in question could be mitigated by rebuilding the structure in a manner that best suits the neighborhood fabric.

Sincerely,


Cindy Wu
Community Planning Manager

1525 Grant Avenue, San Francisco, CA 94133-3323
tel 415.984.1450 | fax 415.362.7992 | www.chinatowncdc.org

N-1

Responses to Letter N

N-1

The comments made in the CCDC letter regarding input from the Chinese Historical Society of America and the local architectural historian, Phil Choy, are not inconsistent with the findings in the SEIS/SEIR. The main difference is in the identification of an adverse effect for the demolition of either of the two buildings in Chinatown that have been determined to contribute to the potential eligibility of Chinatown as a National Register Historic Place-Historic District.

As the SEIS/SEIR points out on page 4-65, a National Register of Historic Places Inventory Nomination Form was completed for the Chinatown Historic District in 1979. Though reportedly the nomination was not approved by the Planning Department in 1986, the nomination has not been rejected by the State Historic Preservation Office (SHPO). The original EIS/EIR for the Third Street Light Rail Project identified the buildings at 814-828 and 933-949 Stockton Street as contributors to the potential Historic District in 1997 (Corbett) and submitted the nomination forms to the SHPO. The Office of Historic Preservation letter dated February 17, 1998, acknowledged the potential Historic District in their response letter as two of twenty “structures that appear to be eligible for inclusion on the NRHP as contributing elements to a Chinatown Historic District, a district that has not been evaluated”. The Chinatown Historic District is listed on the California Register of Historic Resources (status code rating of 3D). An adverse effect is created when an undertaking alters either directly or indirectly the character-defining features of a NRHP-eligible property.

These factors lead to the conclusion of a potential adverse effect for the demolition of either building for a station. Page 6-73 of the SEIS/SEIR describes that “demolition of contributing elements to a NRHP eligible district constitutes an adverse effect under Section 106 of the National Historic Preservation Act of 1966 and under the California Environmental Quality Act.” Mitigation measures for historic property impacts that would reduce the adverse impact, but not to a less-than-significant level, are described on page 6-76 of the SEIS/SEIR: partial preservation, having an architectural historian involved in the design of the new station, salvage of the architectural features for preservation, and development of a permanent display that would include the history of the demolished building and the relevance to the Chinatown District.

Comment Form O


SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479Reception:
415.558.6378Fax:
415.558.6409Planning
Information:
415.558.6377
PUBLIC COMMENTS 公眾意見:

*As a resident of Chinatown, My family + I rely on
 Muni alot. I go to Washington High School +
 work downtown + live in Chinatown, I take
 Muni for at least 3 to 4 hours a day. Please
 build the central subway soon! it not only
 benefit adults + seniors, but also youth of the
 whole city.*

Thank you!

請把我加入/保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

Tony Huang

NAME 姓名

MAILING ADDRESS 郵寄地址

PHONE NUMBER 電話號碼

EMAIL ADDRESS 電郵地址

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the week of the hearing for a recorded message giving a more specific time.)

關於這報告之公聽會將在本年十一月十五日約下午一時半舉行，地點為市政廳 400 號室（請於週內致電 415-558-6422 查詢準確時間）。

Public comments will be accepted from October 17, 2007, to 5:00 p.m. on December 10, 2007. Written comments should be addressed to Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. Comments received at the public hearing and in writing will be responded to in a Comments and Responses document. If you have any questions about the environmental review of the proposed project, please call Joan A. Kugler at 575-6925.

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Responses to Comment Form

O-1

Commenter's support for the project is noted.

Comment Form P


SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479Reception:
415.558.6378Fax:
415.558.6409Planning
Information:
415.558.6377
PUBLIC COMMENTS 公眾意見:

Please get central Subway built soon.
 AS a High school Student, getting to school & home
 is very hard b/c. muni isnt on time & full. The central
 Subway will cut down at least ONE hour of my
 trading time.

Thank you!

請把我加入/保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

Alan Ma

NAME 姓名

MAILING ADDRESS 郵寄地址

PHONE NUMBER 電話號碼

EMAIL ADDRESS 電郵地址

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P-1

Responses to Comment Form P

P-1

Commenter's support for the project is noted.

Comment Form Q


**SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT**

November 8, 2007 二零零七年十一月八日

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479Reception:
415.558.6378Fax:
415.558.6409Planning
Information:
415.558.6377
PUBLIC COMMENTS 公眾意見:

If high school students favor the central subway as a way to ensure faster bus routes in the morning on their way to school, then the building of such an extension really must ascend the ages in terms of use. If the central subway is built, not only will it allow for students who live in the area to get to school on time or early, it will cut down on the hassle of transferring buses as well as trolleys, which is necessary for a high schooler's education. Thank you for your time.

請把我加入/保留在你的郵寄名單內:

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

Connie Zhang

NAME 姓名

MAILING ADDRESS 郵寄地址

conniekundesu@yahoo.com

EMAIL ADDRESS 電郵地址

PHONE NUMBER 電話號碼

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Q-1

Responses to Comment Form Q

Q-1

Commenter's support for the project is noted.

Letter R



TRANSBAY JOINT POWERS AUTHORITY
 Maria Ayerdi • Executive Director

December 7, 2007

Mr. Bill Wycko
 Acting Environmental Review Officer
 San Francisco Planning Department
 1650 Mission Street, Suite 400
 San Francisco, CA 94103

Re: Central Subway Draft SEIS/EIR

RECEIVED

DEC 10 2007

CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M.E.A.

Dear Mr. Wycko,

The Transbay Joint Powers Authority (TJPA) recognizes the importance the City places on the San Francisco Municipal Transportation Agency's (SFMTA) Central Subway project to "link Little Hollywood and Visitación Valley with Union Square and Chinatown" with enhanced transit connections, improved service reliability, and access to economic opportunities.

As there are areas of interface between the Central Subway project and the Transbay Transit Center Program, staff from both agencies have been meeting over the last two years to identify and resolve potential conflicts. The TJPA appreciates the professional manner in which the Central Subway team has presented its project and discussed with the TJPA areas of mutual concern. SFMTA's willingness to examine issues and their responsiveness in advancing possible solutions has been notable and continued cooperative efforts will, no doubt, prove to be beneficial to all parties.

The TJPA has taken an opportunity to review SFMTA's Draft Supplemental Environmental Impact Report/Environmental Impact Statement (SEIR/EIS) of October 17, 2007, and finds that all alternatives are workable for both the Caltrain Downtown Extension (DTX) and Bus Storage facility to be constructed by the TJPA near or along the Central Subway alignment on Fourth Street. The Central Subway's design refinement of Alternate 3B (attached) locating its portal south of Perry Street makes this a viable alternative. Comments are provided below regarding specific locations requiring continued coordination with Transbay Transit Center Program projects:

1. Coordination with the TJPA bus storage access from Fourth Street into Perry Street near Central Subway's portal location in Option 3B,
2. Coordination of the DTX tunnel below Fourth and Townsend streets with Central Subway's surface alignment, and
3. Evaluation of the impact of Central Subway's temporary construction staging on Fourth Street below the I-80 structure between Harrison and Bryant streets with the construction and operation of the TJPA's Bus Storage facility.

R-1

Coordination with the TJPA Bus Storage Access

Chapter 3 - Section 3.2.2, pages 3-53, 3-55, and 3-56

Under Alternative 3B, the document acknowledges that the location of the portal on Fourth Street at Perry Street may restrict access to the proposed Transbay Bus Storage facility underneath I-80 between Fourth and Third streets due to the tight turning radius. Delays to bus movement through the Fourth and Harrison streets intersection during the peak could also occur due to degraded intersection traffic flow (level of service [LOS] F) as a result of project implementation. As mitigation, MTA has investigated reduction of the portal length to shift the portal location southward to allow buses to enter the Transbay bus storage area under the I-80 viaduct from Fourth Street. The mitigation needs to be identified on the project engineering drawings for this alternative. In addition, mitigation measures identified on page 3-53 to facilitate traffic flow along Fourth Street at Harrison Street should also be committed to Alternative 3B implementation.

R-2

Coordination with Caltrain Downtown Extension

Chapter 2 - Section 2.1.2, page 2-9 (Alternative 2) and Section 2.1.3, page 2-24 (Alternative 3)

With overwhelming support by San Francisco voters, Proposition H was approved in November 1999 establishing a local mandate that the City and County of San Francisco to extend Caltrain commuter rail service to downtown San Francisco to a new or rebuilt regional transit station on the site of the existing Transbay Terminal. It was also mandated within the proposition that the new transit station serve high-speed rail. In March 2004, a Final Environmental Impact Statement/Environmental Impact Report for the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project was certified.

R-3

The discussion of the Alternative 2 (Section 2.1.2, page 2-9) and Alternative 3 (Section 2.1.3, page 2-24) should acknowledge that an interface with the future DTX will be required at the intersection of Fourth and Townsend streets. The report should indicate that the extent and nature of the construction interface will be dependent upon the relative timing of the respective projects' construction and will be determined and resolved as part of an ongoing coordination process.

Temporary Construction Impacts

Chapter 6 - Section 6.2.2, page 6-18, Section 6.2.3, page 6-27, and Section 6.3.2, pages 6-37 through 6-39

The document describes construction activities for Alternative 3 that could produce temporary impacts to the movement of buses entering the TJPA bus storage area under the I-80 viaduct from Fourth Street. For both Alternatives 3A and 3B, the tunnel boring machine would be launched adjacent to the bus storage area on Fourth Street and a construction staging area would be located on the west side of Fourth Street under the I-80 viaduct. In addition, muck from the tunnel construction would be extracted and hauled away at this location. Alternative 3B would have additional construction activity in this area due to the construction of the portal north of Bryant Street on Fourth Street.

R-4

Our current schedule anticipates that the area east of Fourth Street between Perry and Stillman will be improved during and put into service prior to completion of the Central Subway construction activities on Fourth Street under the I-80 viaduct. Traffic impacts generated by construction in this area could affect bus movements and the operation of the T.J.P.A. Bus Storage facility. Specific mitigation measures that would allow buses to access the bus storage area during construction should be identified and described separately from other mitigations that propose traffic detours to avoid construction impacts unless these measures would also accommodate bus movements into and out of the bus storage area.

R-4
Cont.

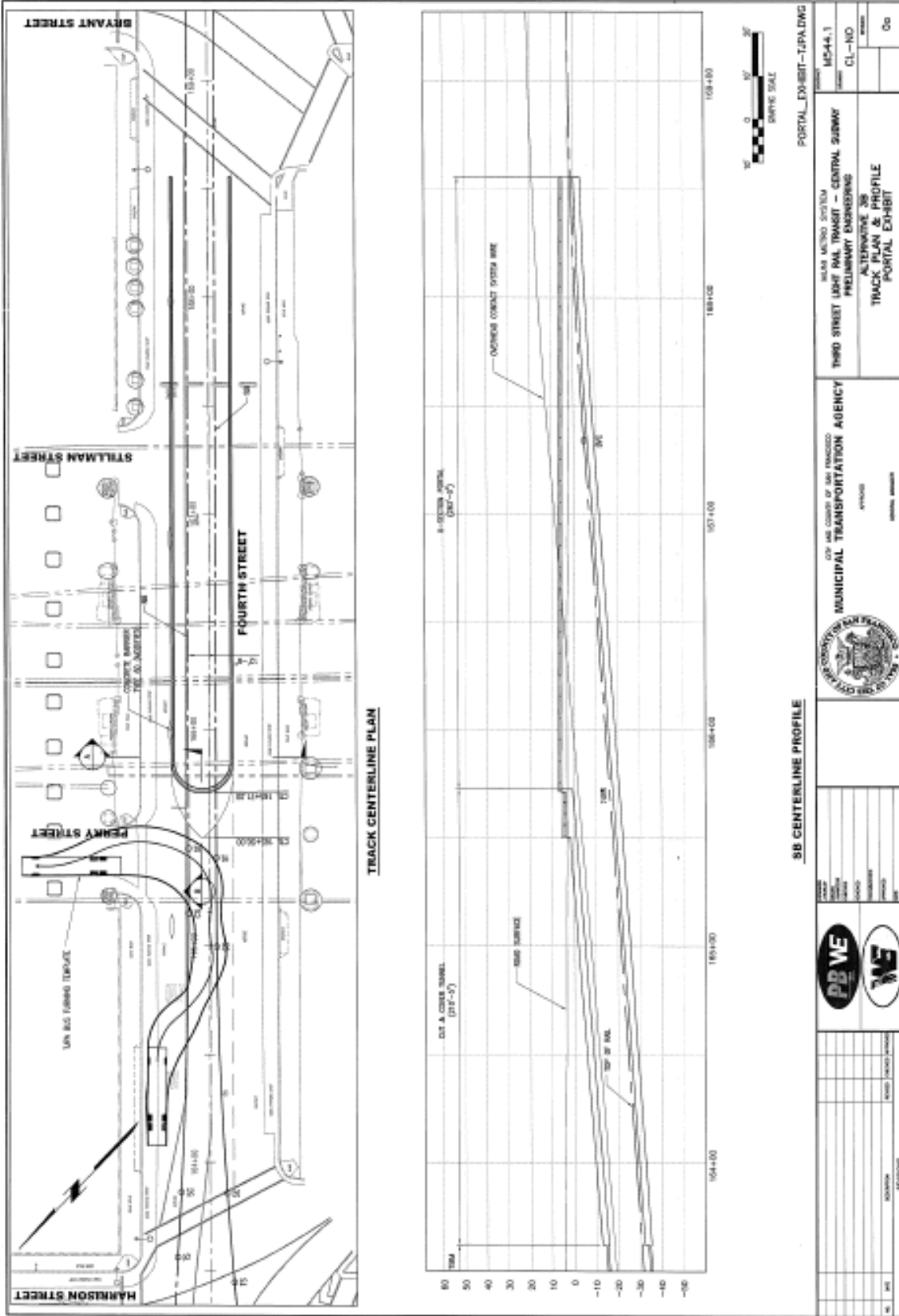
The T.J.P.A. looks forward to continued coordination of efforts with Central Subway. Should there be any questions related to the T.J.P.A. comments, please contact Robert Beck, T.J.P.A. Senior Program Manager at 415.597.4620.

Very truly yours,



Robert Beck
Senior Program Manager

Attachment



Responses to Letter R

R-1

SFMTA is committed to continued close coordination with the TJPA for the interface between the Central Subway Project and the Transbay Transit Center Program, including the Caltrain Downtown Extension and Bus Storage facility on Fourth Street. The design refinement of Alternative 3B, locating the subway portal south of Perry Street is now included in the SEIS/SEIR as the proposed design. The Central Subway use of the temporary staging area under the I-80 structure between Harrison and Bryant Streets has also been refined to minimize any impacts to the TJPA bus storage facility planned for the same area.

The text of Significant Impact 2 Alternative 3B, Traffic Operation/Cumulative, page S-19 is revised as follows:

“2. In addition, the portal at Fourth Street under I-80 may restrict ~~access to the proposed bus storage facility at Perry Street and~~ large truck movements onto Stillman Street.”

The text of Mitigation Measures, Alternative 3B, Traffic Operation/Cumulative, page S-19 is revised as follows:

“Same as Alternative 3A, in addition SFMTA will explore ~~options design modifications to the portal location with Caltrans, the TJPA, and Golden Gate Transit that will permit bus access to Perry Street and~~ truck access to Stillman Street ~~that will to~~ reduce the impacts to a less-than-significant level.”

The following text is added to the second sentence, first paragraph, page 2-36:

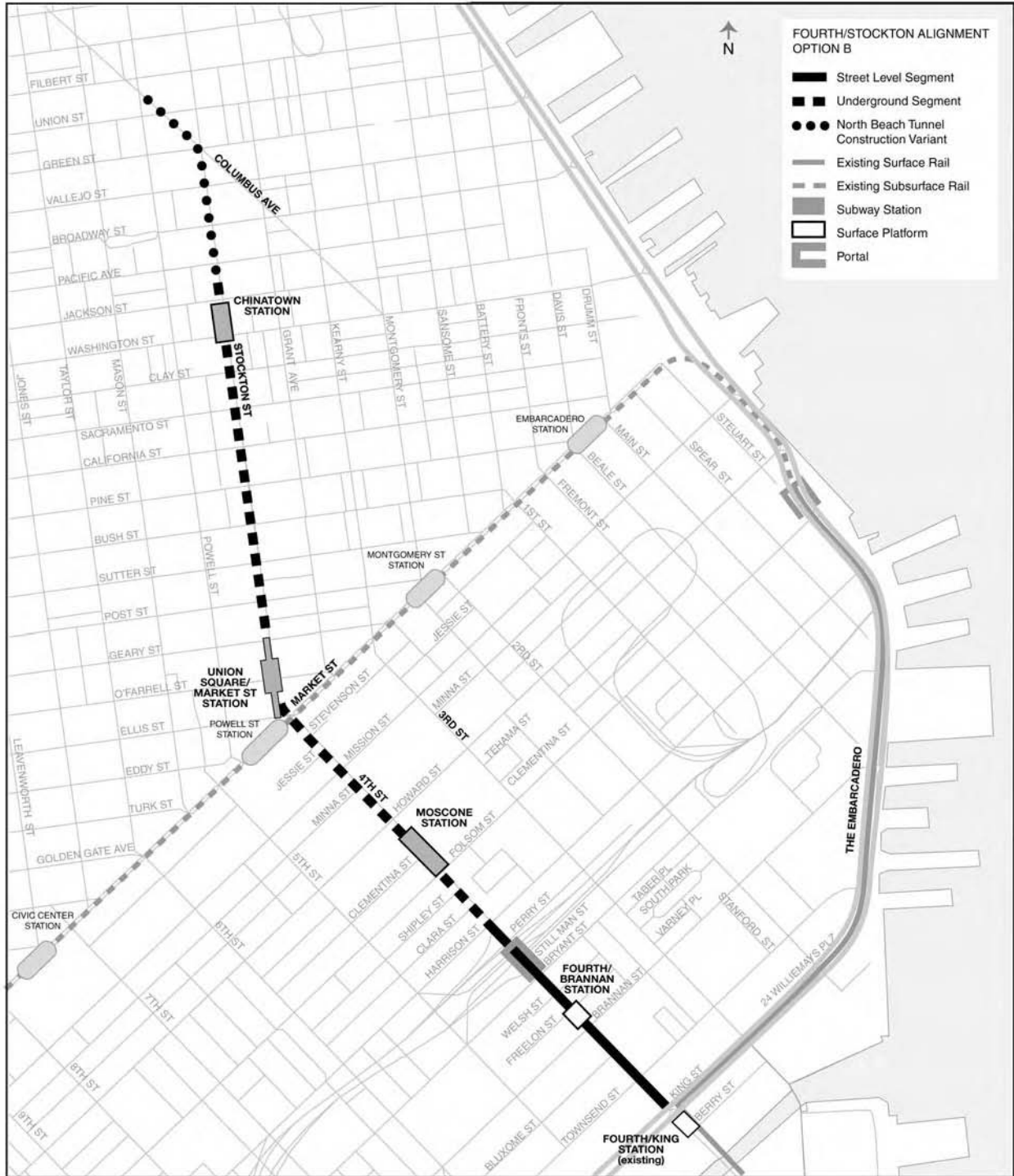
“After stopping at the station platform on Fourth at King Streets, light rail would continue north on Fourth Street to a double-track portal between ~~Bryant Perry~~ and Harrison Streets under I-80 (see Figure 2-16).”

Figures 2-16, 2-18, 2-19 and 5-10 are revised as noted in the attached pages to reflect the relocation of the subway portal and the placement of a crash barrier.

The text in the last two sentences, paragraph two, page 3-55 is revised as follows:

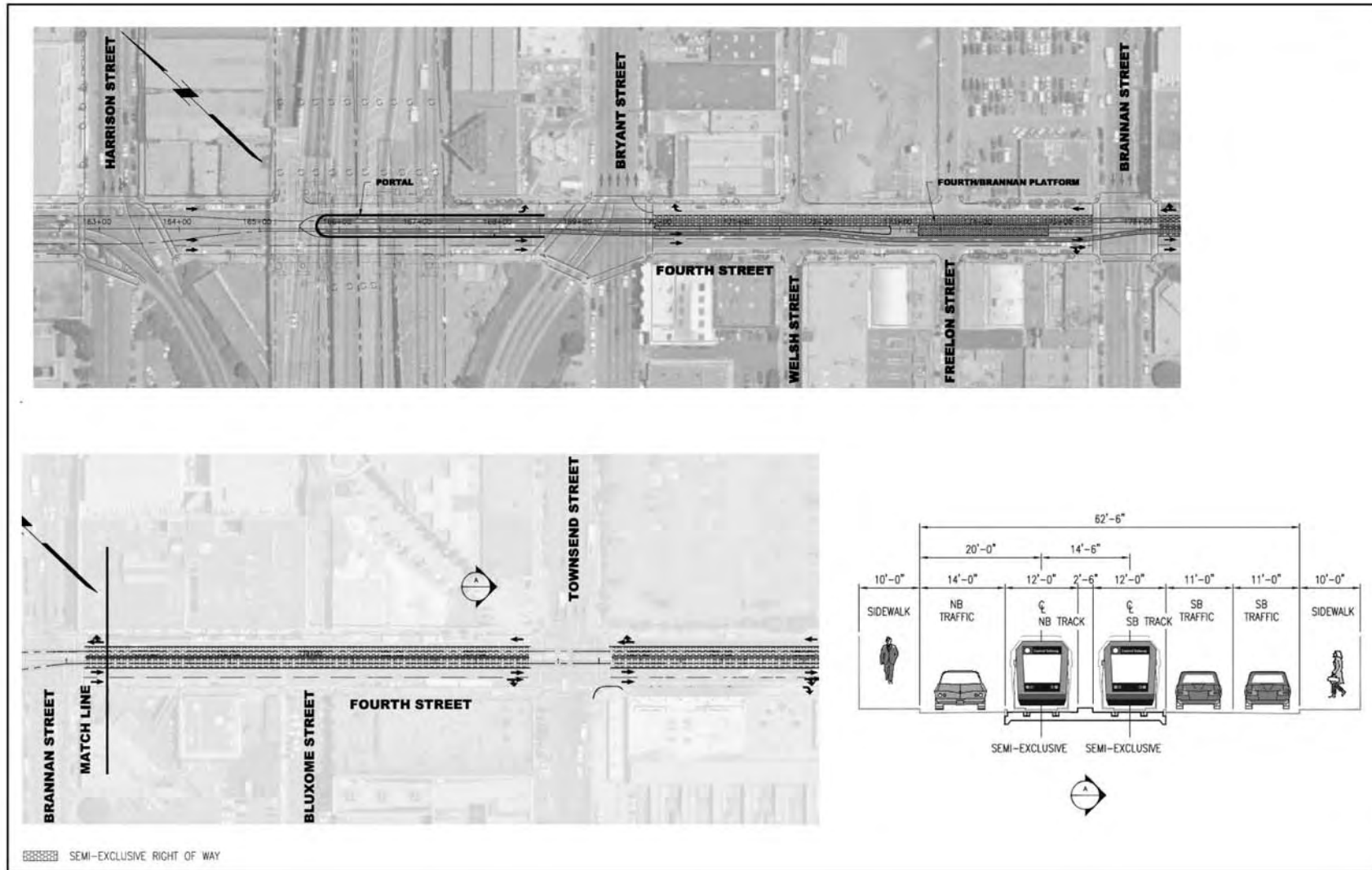
~~“Because of the location of t~~The portal on Fourth Street just south of Perry Street, under the Interstate 80 Freeway, has been located to accommodate the bus access from south-

FIGURE 2-16



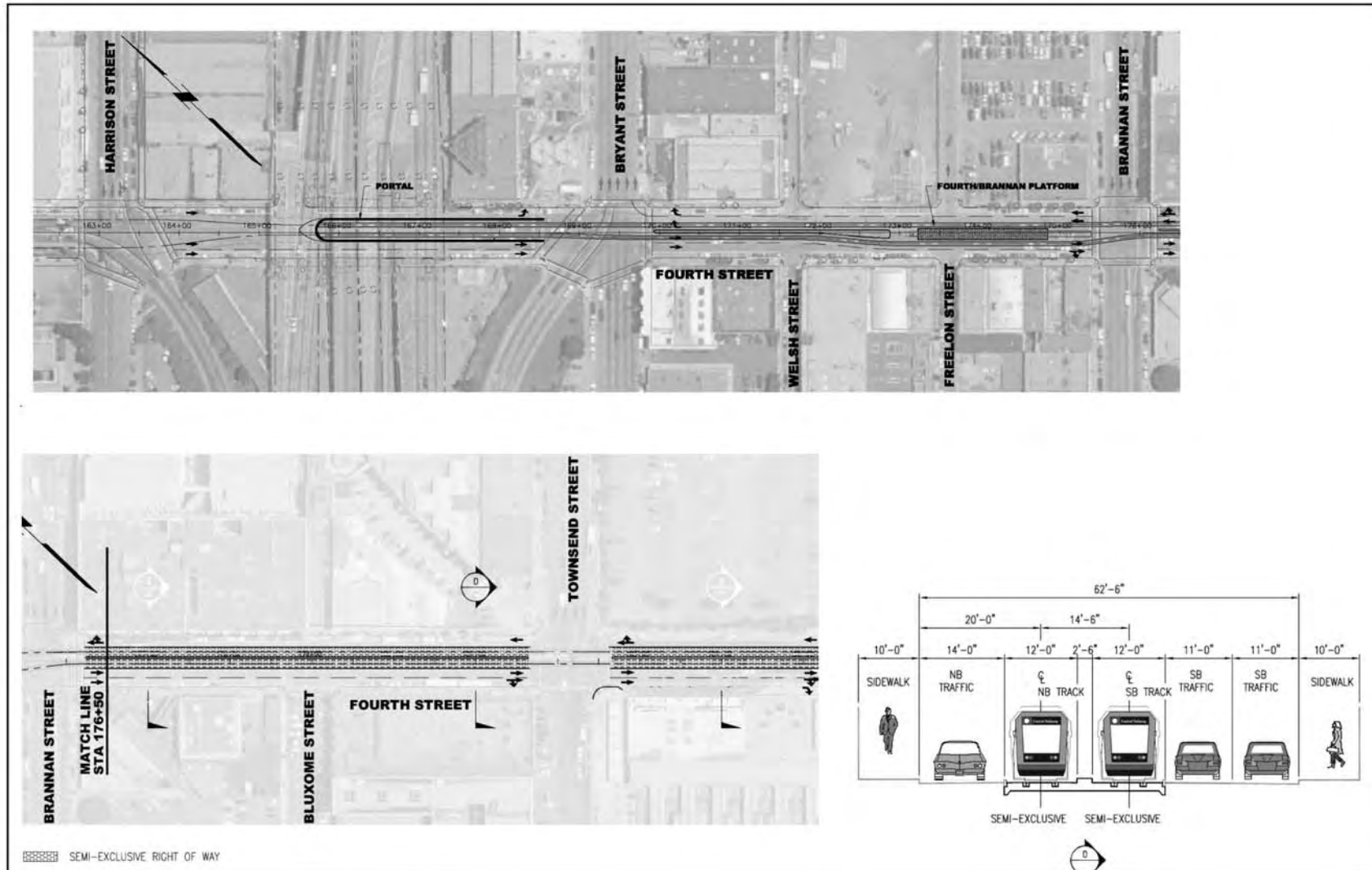
Source: PB/Wong
 Not to scale
 Revised 1/08

FIGURE 2-18



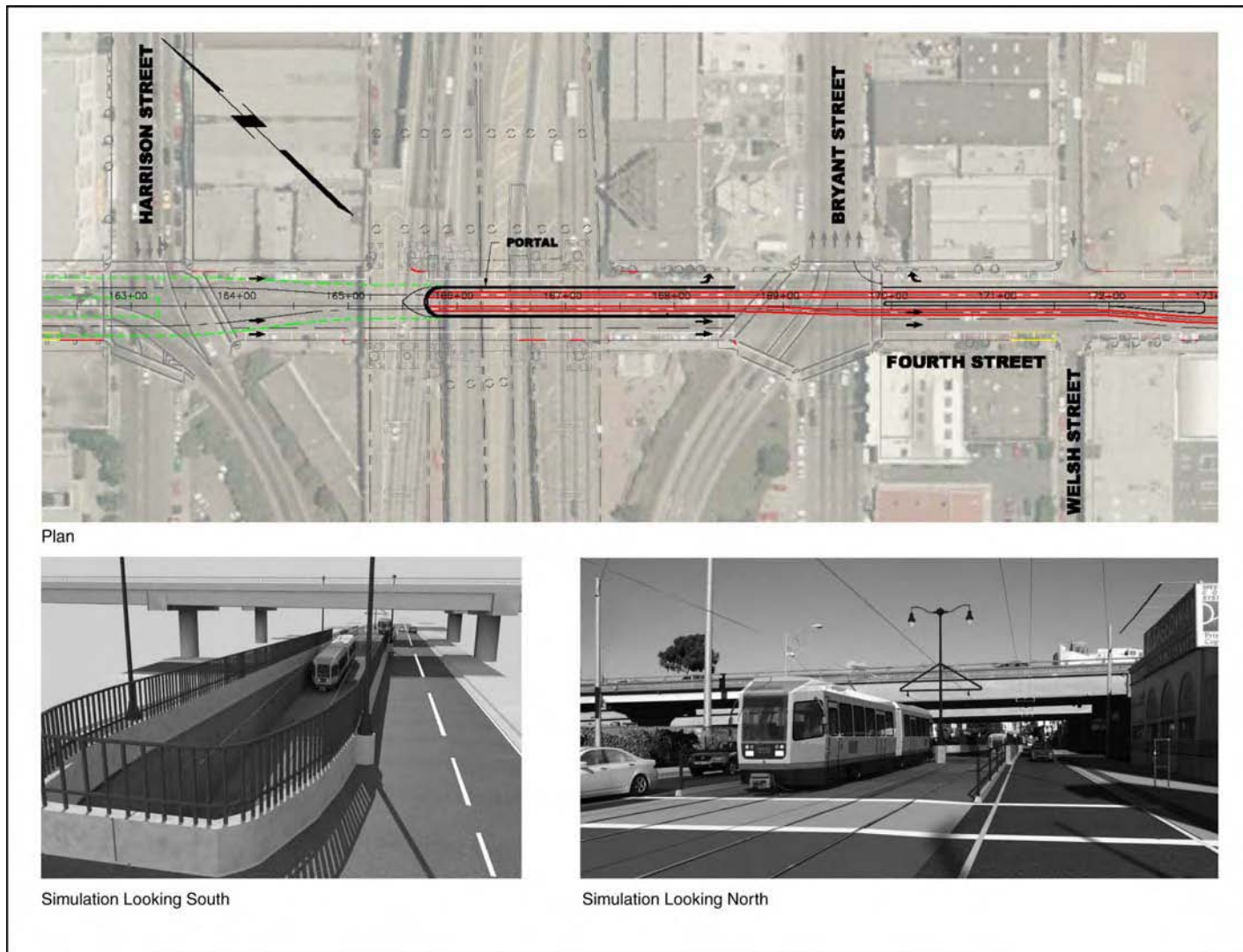
Source: PB/Wong
 Not to scale
 Revised 1/08

FIGURE 2-19



Source: PB Wong
 Not to scale
 Revised 1/08

FIGURE 5-10



Source: PB/Wong
Not to scale
Revised 1/08

~~bound Fourth Street to the bus storage facility may be restricted due to the tight turning radius. The portal may also, however, restrict turn movements of larger trucks (40-foot or greater wheelbase) to Stillman Street for the same reasons.”~~

The text of paragraph two, page 3-56 is revised as follows:

“Mitigation measures would be the same as those described under Alternative 3A except as noted below. To address the tight turn radius issues at ~~Perry-Stillman-Street~~, MTA is currently investigating ~~reducing the portal length and shifting its location southward to allow buses and~~ with Caltrans, the TJPA and Golden Gate Transit the possibility of allowing trucks to enter Perry-Stillman Street from Fourth Street under the Caltrans I-80 structure via the bus storage facility. ~~Other possible options evaluated were to locate the subway portal opening at the immediate north side of the Fourth Street/Bryant Street intersection and to design the incline of the tracks in the portal with a steeper grade or to shift the portal westerly by 13 feet, which would also include shifting of the two westerly traffic lanes and the west sidewalk further west. The relocation of the west sidewalk would encroach into the Caltrans right of way. All of these options would provide adequate space on the east side of Fourth Street to allow buses and trucks to access Perry and Stillman Streets.~~ Other possible options not yet identified may also be considered as part of the coordination process with the Transbay Terminal project team. When the preferred option is selected, it would be included into the design ~~of the portal~~ for this Project.”

The following text is added following the third paragraph, page 3-58:

“The access to Stillman Street for larger trucks (40-foot wheelbase and above) would be restricted under this alternative due to the location of the portal.”

The text in the fourth paragraph, page 3-58 is revised as follows:

“Mitigation measures would be the same as those described above under Alternative 2, except as noted below. To address the tight turn radius issues at Stillman Street, MTA is currently investigating with Caltrans, the TJPA and Golden Gate Transit the possibility of allowing trucks to enter Stillman Street from Fourth Street under the Caltrans I-80 structure via the bus storage facility. Other possible options not yet identified may also be considered as part of the coordination process with the Transbay Terminal project

team. When the preferred option is selected, it would be included into the design for this Project.”

The first sentence, last paragraph, page 6-18 is revised as follows:

“The tunnel construction shaft would be located on Fourth Street ~~between~~, just south of Perry Street, between Harrison and Bryant Streets.”

The text of Significant Impact 2 Alternative 3B, Traffic Operation/Cumulative, page 7-11 is revised as follows:

“2. In addition, the portal at Fourth Street under I-80 may restrict access ~~to the proposed bus storage facility at Perry Street and~~ large truck movements onto Stillman Street.”

The text of Mitigation Measures, Alternative 3B, Traffic Operation/Cumulative, page 7-11 is revised as follows:

“Same as Alternative 3A, in addition SFMTA will explore options design modifications to the portal location with Caltrans, the TJPA and Golden Gate Transit that will permit bus access to Perry Street and truck access to Stillman Street ~~that will~~ to reduce the impacts to a less-than-significant level.”

The text of Less-Than-Significant Impact, Alternative 3B, Freight and Loading Operation/Cumulative, page 7-13 is revised as follows:

“1. Permanent removal of some on-street loading spaces on Fourth Street and four spaces on Stockton Street between Washington and Jackson Streets would occur.

2. The access to Stillman Street for larger trucks would be restricted under this alternative due to the portal location.”

The text of Improvement Measures, Alternative 3B, Freight and Loading Operation/ Cumulative, page 7-13 is revised as follows:

“Same as Alternative 2, except MTA will explore with the TJPA and Golden Gate Transit options that will permit truck access to Stillman Street.”

R-2

See Response to Comment R-1. The design of the tunnel portal has been modified to reduce the portal length and shift the portal location south to allow buses to enter the bus storage facility under the I-80 Freeway from Fourth Street using Perry Street. The removal of the tight turning radius will also remove the potential for further bus delays at the Fourth and Harrison Streets intersection. The text has been revised to reflect discussions with the TJPA and design refinements to minimize impacts to the TJPA bus storage access.

R-3

The description of the TJPA Transbay Terminal, and possible future accommodations for Caltrain Peninsula Rail Service and a future high speed train is in the third bulleted item on page 2-8 of the SEIS/SEIR. Continued coordination between SFMTA and the TJPA is considered a vital part of the design development and engineering phases for the Central Subway Project to make sure that construction timing and project implementation will minimize any potential conflicts with the Caltrain Downtown Extension, should it be funded and implemented.

R-4

See Response to Comment X-4 for discussion of the operation of the bus storage facility and revised text on pages 3-56 and 6-36 of the SEIS/SEIR, under Mitigation Measures, for how temporary construction related impacts to the bus storage area under I-80 would be minimized.

Letter S

RECEIVED

DEC 07 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Mary E. Gilpatrick
946 Stockton Street Apt. 9A
San Francisco, CA 94108

December 6, 2007

Mr. Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Dept.
Central Subway Draft SEIS/SEIR
1650 Mission Street Suite 400
San Francisco, CA 94103

Dear Mr. Wycko:

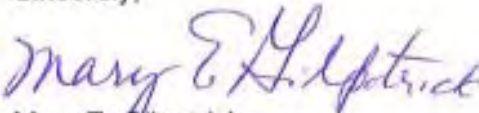
I have reviewed the Central Subway Draft Supplemental Environmental Impact Statement/Report and have some serious concerns regarding the significant negative impacts this project will have on the environment, architectural and historical integrity of the area, and health and safety of the residents and their properties due to increased noise, vibration and traffic, with attendant rise in crime. Vibrations in particular are an issue due to the fact we live in a seismically active area. The report attempts to sell a lot of "blue sky" presenting scenarios and numbers that are not supported and, therefore, speculative.

S-1

I am not in favor of such a project, but I may be outnumbered. If that is the case, then I would like to state that I would prefer Alternatives 2 or 3A be selected should the project in fact become a reality.

S-2

Sincerely,


Mary E. Gilpatrick

Responses to Letter S

S-1

Letter expresses concerns about the significant negative impacts of the project on the environment and the speculative nature of the report. The potential for environmental effects are detailed in Sections 3.0, 5.0, and 6.0 of the SEIS/SEIR. The analysis for the SEIS/SEIR has been based on accepted professional methodology for projecting potential environmental impacts associated with the implementation of a rail project as can be applied to the proposed Central Subway project in the San Francisco environment. A comparative summary of significant impacts is shown in Table 7-2, along with mitigation measures. Detailed analysis of impacts can be found in Sections 5.0 and 6.0 of the SEIS/SEIR and analysis of impacts to traffic can be found in Section 3.0.

Architectural and historic integrity impacts (for the proposed station in Chinatown) resulting from demolition of the existing building at 933-949 Stockton Street that contribute to the Chinatown Historic District would be partially mitigated through partial preservation of the building through rehabilitation, hiring an architectural historian to assist in the design development of the station and incorporation of architectural elements compatible with surrounding architectural features in the building architectural treatment, and/or salvaging of architectural features for conservation into a historic display in the station. The building at 933-949 Stockton Street is one of fourteen historic buildings in the block and 371 contributing buildings in the Chinatown Historic District.(see page 6-78 of the SEIS/SEIR). Other than the property proposed for demolition for the station, temporary construction-related vibration and visual impacts would not have significant adverse effects to historic properties or the Chinatown Historic District. (see pages 6-76 and 6-81 of the SEIS/SEIR).

The contractor would be responsible for hiring an acoustical consultant to prepare a Noise and Vibration Control Plan that would identify all potential impacts that may occur during construction and would provide adequate control measures to clearly demonstrate that the noise and vibration criteria and limits established by the San Francisco Noise Ordinance would be adhered to. (see page 6-117 of the SEIS/SEIR).

Long term traffic impacts would result from the project South of Market Street but not in Chinatown where the Central Subway would be in a deep tunnel. Mitigation measures for traffic impacts are described on pages 3-53 thru 3-56 of the SEIS/SEIR. Significant impacts to traffic at the intersections of King and Fourth Street and King and Third Streets cannot be mitigated to less-than-significant levels.

S-2

Comment expresses opposition to the project and preference for Alternative 2 or Alternative 3A if the project does move forward.

Letter T



舊金山中華文化基金會
CHINESE CULTURE FOUNDATION OF SAN FRANCISCO
750 Kearny Street, 3rd Floor
San Francisco, CA 94108-1809

November 15, 2007

Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
Central Subway Draft SEIS/SEIR
1650 Mission Street, Suite 400
San Francisco, CA 94103.



RE: Central Subway

Dear Mr. Wycko:

We note that in the Central Subway SEIR, losing one of the buildings that is set as a potential site (the Hogan and Vest or Ning Yuen building) does not necessarily adversely affect the eligibility of Chinatown to be a historic district.

T-1

We do have concerns, however, that the SEIR should address the design of a replacement building and the Central Subway station in Chinatown that would be **culturally appropriate to the Chinatown community**.

T-2

Two-percent of the construction costs of the Central Subway is designated for public art. It is essential that the Chinatown community have a voice in determining what art that will represent the community in the Central Subway project.

The Chinese Culture Center has been working with the San Francisco Arts Commission and Chinatown CDC to help facilitate a public arts selection process that is open and transparent to the Chinatown community.

The mission of the Chinese Culture Center is to preserve, promote, and influence Chinese and Chinese-American art and culture. We have been serving as an artistic voice for this community since 1973. The Chinese Culture Center is the obvious choice to serve as a cultural facilitator between the Arts Commission and the Chinatown community.

T-3

The Arts Commission has approached the Chinese Culture Center to assist in the following:


- to publicize and convene public meetings in Chinatown to announce planning and artist recruitment for Central Subway
- to publicize and convene artist workshops to help explain the Arts Commission's application process

- to publicize and convene artist workshops to provide information regarding the translation of 2 -dimensional artwork and designs into permanent media
- to organize meetings regarding the development of Public Art Master Plan for Central Subway
- to assist in publicizing Request for Qualifications to recruit local artists
- to serve on Artist Selection Panels and make recommendations of other community members to serve on Artist Selection Panels
- to serve as venue for exhibition of finalists proposals for public comment
- to serve as venue for workshops between selected artists and community
- to help match artists with experienced design professionals who can work as part of artist's team

In order to adequately assist the Arts Commission in connecting with the Chinatown community, the Chinese Culture Center will need more resources than our current capacity. In reviewing the SEIR, we ask that Planning Commission consider the funding of a Chinatown community liaison for the San Francisco Arts Commission with the Chinese Culture Center.

Thank you for your time and consideration.

Best regards,



Sabina Chen
Executive Director

T-3
Cont.

Responses to Letter T

T-1

Comment noted that loss of one building for a station would not necessarily adversely affect the eligibility of Chinatown as a potential Historic District. See Response to Comment N-1.

T-2

The text under Mitigation Measure #2, page 6-76, has been revised as follows:

“2. Include expertise of an architectural historian in design development of station to develop a design culturally appropriate to the Chinatown community”.

T-3

SFMTA has included coordination with the Arts Commission as part of the scope of services with the CCDC as follows:

CCDC will assist in the coordination and integration efforts of the Arts Commission and architects/engineers for development of a visual image for the Chinatown subway station that reflects community supported art. Work with the San Francisco Arts Commission and Chinatown community-based arts organizations to develop an inclusionary process for choosing artists and artwork that will be associated with the Chinatown station.

CCDC will coordinate with the Chinese Culture Foundation for input to this process.

Letter U



www.renewsf.org

RECEIVED

DEC 10 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

December 3, 2007

The Honorable Nancy Pelosi
Speaker
United States House of Representatives
Washington D.C. 20515

Dear Madam Speaker,

The Board of Directors of RENEW SF would like to express our strong support for the San Francisco Central Subway project and specifically Alternative 3B proposed in the Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report dated October 17, 2007. RENEW SF is a neighborhood nonprofit organization dedicated to improving the planning and qualities of life of the Northeast and waterfront of San Francisco through coordinated community planning efforts.

The vision of the Central Subway project is to provide a vital linkage between the Third Street corridor in the Southeastern part of the City and Chinatown in the Northeast. Upon completion, the subway would have effectively brought the city closer together, making it easier for residents as well as tourists to visit the many wonderful neighborhoods the city as to offer. This improved accessibility will undoubtedly also benefit the many retail and small businesses along the subway line.

Furthermore, San Francisco is proud of its Transit First policy and the Central Subway project exemplifies this priority. Especially at a time when the City should take every possible step to reduce the carbon footprint, the Central Subway is welcome by all.

RENEW SF applauds your leadership and support of the Central Subway project from its inception. We urge that funding be appropriated to ensure the successful completion of the project.

Sincerely,

Wells Whitney
Chair of the Board

Claudine Cheng
Treasurer

CC: William Wycko
Acting Environmental Review Officer
San Francisco Planning Department

Board of Directors:
Claudine Cheng
Rod Freebairn-Smith
Marvin Kasoff
Robert Mittelstadt
Wells Whitney, Chair

U-1

Responses to Letter U

U-1

Letter expresses support for the Central Subway Project and specifically for Alternative 3B.

Letter V

PETER HARTMAN
300 THIRD STREET, NO. 310
SAN FRANCISCO, CALIFORNIA 94107

RECEIVED
DEC 10 2007
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

December 9, 2007

San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

Re: Central Subway Draft SEIS/SEIR

As a member of the Central Subway Citizens Advisory Group and a South of Market resident homeowner, I have reviewed the Draft EIR. First, I believe that the document has adequately identified and addressed all of the potential impacts of the four project alternatives. The Draft EIR covers the construction, operational and cumulative impacts and associated mitigation measures on seven transportation conditions and twelve environmental conditions in the project area. The Draft EIR is adequate and complete.

V-1

Second, out of all the impacts identified there were only a handful of impacts that had significant unavoidable environmental effects. These include increased traffic congestion in several intersections during some commute times, displacement of up to 10 businesses and 17 residential units, demolishing of an historic Chinatown building and the possible impact on archeological resources. I believe that these few impacts are vastly outweighed by the project benefits identified in the Draft EIR which include increased mobility, decreased vehicle congestion and emissions, increased Muni operating efficiencies and compatibility with other city land use plans and policies by maximizing transit ridership, reducing auto trips and providing opportunities for transit-oriented development.

V-2

Finally, I suggest that high-density, transit-oriented developments be built above both the Moscone and Chinatown stations. This is particularly true at the Moscone station at the NW corner of Fourth and Folsom streets which is currently a gas station and but is zoned for an allowable 130 foot height. The Draft EIR shows the station entrance in a 40 ft. building. The project should take advantage of the all the allowable height and build a high-rise, mixed-use, transit-oriented development at the Moscone Station site.

V-3

Sincerely,


Peter Hartman

Responses to Letter V

V-1

Comment on the adequacy and completeness of the Draft SEIS/SEIR is noted.

V-2

Comment that the project benefits outweigh the potentially significant environmental impacts is noted.

V-3

Comment of support for transit-oriented development above the Moscone and Chinatown Stations is noted. SFMTA will issue RFPs for development of stations as the next phase of work after this SEIS/SEIR. Transit-oriented development proposals for the station sites will be evaluated as part of an independent environmental process if a firm proposal is submitted to the Planning Department.

Letter W

RECEIVED

DEC 10 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Homer Teng
Chinatown Families Economic
Self-Sufficiency Coalition
c/o Chinese Newcomers Service Center
777 Stockton Street, Suite 104
San Francisco, CA 94108

December 10, 2007

Mr. Bill Wycko
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: The Central Subway Project

Dear Mr. Wycko:

The Chinatown Families Economic Self-Sufficiency Coalition (CFESC) would like to comment on the Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report of the proposed Central Subway Project. The CFESC is a collaboration of 16 community agencies and the City College of San Francisco. Its mission is to support limited English speaking immigrant Chinese families to achieve economic self-sufficiency, by promoting and advocating for training and employment in fields that provide living wages, benefits, and advancement potential.

The CFESC supports any effort by the San Francisco Metropolitan Transportation Agency (SFMTA) to relieve traffic congestion and improve public transit throughout the City. The need for enhanced public transit is particularly acute for the residents of Chinatown who rely mostly on public transportation to get to and from work, and where current bus routes are inadequate and over capacity. However, the CFESC also realizes it is important that short-term and long-term impacts to the neighborhood be addressed thoroughly before the Central Subway Project is given the green light. Specifically, the CFESC would like the Planning Commission to make sure that it receives satisfactory answers to the following questions:

1. How will the SFMTA ensure that the noise level will be kept to a minimum during construction?
2. Will small businesses affected by the construction be offered relocation assistance or compensation for their loss during construction? Will displaced businesses have an opportunity to rent space at the subway station?
3. Will the SFMTA assure that any loss of affordable housing due to the construction of a subway station in Chinatown be replaced?
4. Will the SFMTA make sure that neighborhood residents be given preferences for jobs generated by the project?
5. Will the SFMTA partner with community agencies and the City College to help train community residents in the trades that will be needed for the project? Further, will it help

W-1

W-2

W-3

W-4

W-5

W-6

support Vocational English as a Second Language programs aimed at assisting limited English-speaking residents with those trade skills to become better prepared for those job opportunities?

6. Will the community be given ample opportunity to provide input on the project, regarding the design of the station and where it will be located?
7. What will be the impact on current bus service — will there be service cutbacks?

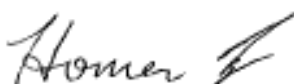
W-6
Cont.

W-7

W-8

We would like to conclude by reiterating that the CFESC acknowledges the need to relieve traffic congestion throughout the city, especially in Chinatown. We urge you to consider fully the above concerns while deciding whether the Central Subway Project is the best way to address it.

Sincerely,



Homer Teng
Coordinator
Chinatown Families Economic
Self-Sufficiency Coalition

cc. Nathaniel Ford, SFMTA

Member agencies of the CFESC:

APA Family Support Services (APA)
Asian Women Resource Center (AWRC)
Charity Cultural Services Center (CCSC)
Chinese for Affirmative Action (CAA)
Chinese Newcomer Service Center (CNSC)
Chinese Progressive Association (CPA)
City College of San Francisco (CCSF)
Community Youth Center (CYC)
Donaldina Cameron House
Goodwill Industries
Jewish Vocational Service (JVS)
Kai Ming Head Start
Maintenance Training Corporation (Maintrain)
NICOS Chinese Health Coalition
Refugee Transitions
Self-Help for the Elderly
Wu Yee Children's Services

Responses to Letter W

W-1

The Chinatown Families Economic Self-Sufficiency Coalition (CFESC) supports any effort to relieve traffic congestion and improve public transit. Comment noted. The SEIS/SEIR analyzes both short-term construction impacts and long-term operational impacts of the Central Subway Project.

W-2

Page 6-117 of the SEIS/SEIR describes that mitigation during construction will need to meet the San Francisco Noise Ordinance Limits, and that a detailed Noise and Vibration Control Plan will be prepared during the final engineering design for the project. This plan will identify all sources of noise during construction and will identify noise control measures that would be monitored during construction. The mitigation measures in the draft document describe typical noise control measures for construction activities. Appendix I, Mitigation Monitoring and Reporting Program, describes how construction noise and vibration would be monitored to ensure that Ordinance limits are met.

W-3

See Response to Comment A-4. Small businesses displaced by the project will be offered relocation assistance and compensation for their loss of business during construction, as required by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and the State of California Relocation Act. Displaced businesses would also be given first rights to opportunities for renting commercial space in a new Chinatown station. Mitigation measures to minimize potential impacts to businesses in the Project Area are described for parking and truck access in Section 6.3 and for noise in Section 6.15 of the SEIS/SEIR.

W-4

See Response to Comment A-4. Residents displaced by the project will be relocated during the period following the adoption of the Final SEIR/SEIS and Record of Decision scheduled for late 2008 and prior to the start of construction scheduled for 2010. Section 6.5.2 of the SEIS/SEIR describes the process to be used to comply with the Uniform Relocation Act for the 17 residential units displaced in Chinatown at the 933-949 Stockton Street station location. The potential for the replacement of housing on the Chinatown Station sites is identified as a mitigation measure on pages 6-52 to 6-84 of the SEIS/SEIR.

W-5

SFMTA will provide opportunities for Chinatown residents to seek jobs on the Central Subway Project through public notices (in English and Chinese) in Chinatown newspapers and project newsletters over the next two years and during construction. SFMTA has also retained the services of the CCDC to assist in communicating job opportunities to Chinatown residents.

W-6

Job training would be part of the construction contracting and procurement process, not part of the environmental review process for the project. SFMTA will explore all opportunities, consistent with City policies, to offer access to training for language and trades skills over the next several years leading to construction of the Central Subway.

W-7

Representatives from Chinatown are part of the Community Advisory Group (CAG) that has been actively involved in the Third Street Light Rail Project for over ten years. The screening process used to identify alternative station locations in Chinatown is described in Section 2.4 (pages 2-59 to 2-62) of the SEIS/SEIR that describes how the two station alternatives were selected for analysis. Chinatown representatives will continue to provide input to the station design and station art over the next several years and during final design/engineering for the project. SFMTA has retained the services of the CCDC to assist in the coordination with Chinatown businesses and residents and architectural historians to ensure that opportunities for input are part of the design and decision process leading to construction. Project presentations have been made to community organizations (Chinatown Families Economic Self-Sufficiency Coalition, Chinese Chamber of Commerce, Chinese Consolidated Benevolent Association, Chinatown Presbyterian Church) over the past year and a public meeting at the Gordon Lau Elementary School was held on November 8, 2007 to review the project and environmental findings.

W-8

See Response to Comment J-2. As noted on pages 3-36 and 3-37 of the SEIS/SIER bus service on the 30-Stockton, 45-Union/Stockton, and 9X/9AX/BX-San Bruno would continue once the Central Subway is completed, though headways may be adjusted.

Letter X

December 7, 2007

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DEC 10 2007

CITY OF SAN FRANCISCO
PLANNING DEPARTMENT
M.E.A.
COUNTY OF S.F.

Mr. Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Re: **Central Subway Draft Supplemental Environmental Impact Statement/Report (DSEIS/R), October 2007**

Dear Mr. Wycko:

Golden Gate Bridge, Highway and Transportation District (District) has reviewed the above-referenced document and offers the following comments pertaining to Golden Gate Transit (GGT) transit operations and facilities in the project Study Area.

GGT Bus Storage Facility Background

Since 1972, the District has actively sought a site for a permanent midday bus storage facility in San Francisco. Such a facility will secure the ability by this District to provide a viable public transit alternative between San Francisco and communities along the Golden Gate Corridor.

The Metropolitan Transportation Commission's 2001 Transbay Terminal Improvement Plan successfully concluded a nearly 35-year debate to determine the fate of the existing terminal. With the active participation and endorsement of this District, the City and County of San Francisco and other study panel members, this Plan successfully achieved regional consensus by recommending a replacement for the existing terminal.

The implementation of this Transbay Terminal Center (TTC) Plan will significantly benefit GGT by providing a long-sought GGT-exclusive and permanent bus storage facility beneath the I-80 freeway on the block bounded by 4th, Stillman, 3rd and Perry streets. The 2004 certified Final Environmental Impact Statement/Report (EIS/R) for the new Transbay Terminal project assumed GGT would access this facility via southbound 4th Street and eastbound Perry Street.

Comments on Central Subway Alignment Alternatives

- District appreciates the DSEIS/R acknowledgement of District's future bus storage facility at 4th and Perry streets throughout this document.
- District appreciates efforts by San Francisco Municipal Transportation Authority (MTA) in developing Alignment Alternatives that do not appear to restrict or compromise the access to this future bus storage facility at 4th and Perry streets. District acknowledges the assistance of Transbay Joint Powers Agreement (TJPA) staff and consultants in representing District interests and facilitating meetings between SFMTA and District staff to address District bus facility access issues affecting the Central Subway project.
- District appreciates recent design modifications for the portal location shown in the attached plan (labeled "Alternative 3B, Track Plan & Profile: Portal Exhibit," dated 10/10/07) prepared by SFMTA and transmitted to District by TJPA on 10/12/07. This recent

X-1

X-2

Mr. Wycko, SF Planning Department
Comments to Central Subway DSEIS/R

December 7, 2007
Page 2

Alternative 3B plan does not appear to restrict access by GGT buses to the bus storage facility on 4th and Perry streets. However, the Alternative 3B plan in the DSEIS/R, Pages 2-39 and 5-40, appears to illustrate a portal location that restricts access to the future bus storage facility by GGT buses. For example, Page 3-55 states “Because of the location of the portal on Fourth Street at Perry Street under the Interstate 80 freeway, the bus access from southbound Fourth Street to the GGT bus storage facility may be restricted due to the tight (bus) turning radius”. Also, Page 7-11 states “the portal at Fourth Street under I-80 may restrict access to the future bus storage facility at Perry Street”. Therefore, District requests that the FSEIS/R incorporate the attached 10/10/07 Alternative 3B, Track Plan & Profile: Portal Exhibit that mitigates this impact to GGT bus access to the future District bus storage facility. With this change to Alternative 3B portal location, District can support the Central Subway project.

X-2
Cont.

- Neither Alternative 3B portal location shown on Pages 2-39 and 5-40 of the DSEIS/R nor the 10/10/07 plan includes design details for a portal impact attenuator. As previously discussed between District, SFMTA and TJPA staffs, please add the attenuator to the design plans for Alternative 3B portal in a manner that does not restrict the ability of GGT buses to access the future bus storage facility.

X-3

Comments on Central Subway Construction Impacts

Page 1-14 states one of the objectives of the Central Subway project is to “Minimize Adverse Construction Impacts”. Page 7-5 defines a significant effect under CEQA for “Transit Services and Accessibility” to be an effect that may “cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result”. Pages 6-40 and 7-12 imply that close coordination with this District will be required to minimize impacts to GGT operations. District appreciates that construction impacts are temporary, and the full sequence of construction staging needs to be determined. Nevertheless, there appear to be several construction-related activities referenced in the DSEIS/R that potentially impact GGT’s ability to either access or fully utilize the future bus storage facility. Since specific impacts to GGT operations are not identified, it is not possible to determine if these impacts are significant. Specific construction-related activities are discussed below.

X-4

Impacts and Mitigation for Transit

- Pages 6-34 through 6-36 (referring to all Alignment Alternatives) describe impacts and mitigating measures related to public transit services during project construction. The SDEIS/R does not adequately disclose if these impacts and mitigating measures will be applied to MUNI, GGT and/or all transit services in the Study Area. Given the high importance of GGT’s future bus storage facility at 4th and Perry (as stated in the beginning of this letter), impacts to GGT operation and facilities along 4th Street are not known and may be potentially significant.

Tunnel Excavation Shaft

- Page 6-25 (referring to Alternatives 3A and 3B) states a “tunnel excavation shaft” will be located on 4th Street “beneath I-80 between Harrison and Bryant Streets,” i.e., opposite the entrance of the future GGT bus storage facility. Pages 6-35 and 6-36 (referring to Alternatives 3A and 3B) state “At the tunnel construction shaft, buses will be rerouted to the west side of Fourth Street between Bryant and Harrison” and “buses would return to the east side of the street” and “two west lanes of Fourth Street between Bryant and Harrison Streets would remain closed for the duration of the construction of the guideway tunnels”. This

X-5

Mr. Wycko, SF Planning Department
Comments to Central Subway DSEIS/R

December 7, 2007
Page 3

section of the DSEIS/R does not adequately disclose whether "buses" includes GGT and whether GGT will be able to access the future bus storage facility during construction of the tunnel excavation shaft.

Furthermore, Pages 6-34 and 6-35 (referring to Mitigation Measures common to all Alternatives) state "DPT would develop detour routes for non-transit traffic" and "DPT would try to limit traffic along construction routes to transit...". This suggests, although does not specifically state, that GGT will continue to operate on 4th Street during construction activities. District requests that DPT permit access to the future bus storage facility via 4th Street during project construction.

Utility Relocation and Curb Side Parking

- Page 6-32 (for Alternative 3B) states utility relocation and simultaneous elimination of curbside parking on 4th Street between Harrison and Bryant streets will be required during the first six months of project construction. The SDEIS/R does not disclose how (or if) GGT will be able to access the bus storage facility at 4th and Perry streets during this time. District requests that DPT permit access to the future bus storage facility via 4th Street during project construction.

Impacted Transit Services

- Page 6-32 (for Alternative 3B) states "The first 18 months of...pre-construction activities would include...impacted transit services". The SDEIS/R does not disclose if MUNI, GGT, or all transit services are expected to be impacted during this 18-month construction period.

Impacts and Mitigation for Traffic

- Page 6-38 (for Alternatives 3A and 3B) cites "Two traffic lanes on Fourth Street between Howard and Folsom Streets, would be closed for approximately four months...". The SDEIS/R does not disclose how (or if) GGT will be impacted by this lane closure.

The DSEIS/R does not appear to fully disclose how construction-related activities (i.e., tunnel excavation, shaft construction, utility relocation, elimination of curbside parking, street lane closures, and other activities) could potentially affect GGT's ability to access and fully utilize the future bus storage facility at 4th and Perry streets during construction of the Central Subway project. District requires access to the bus storage facility on a daily basis and expects to be consulted during the development of traffic diversion plans so access is assured.

District staff appreciates the opportunity to comment on the DEIS/R for this project. Please call our Principal Planner, Maurice Palumbo, at (415) 925-0160 if you have questions.

Very truly yours,

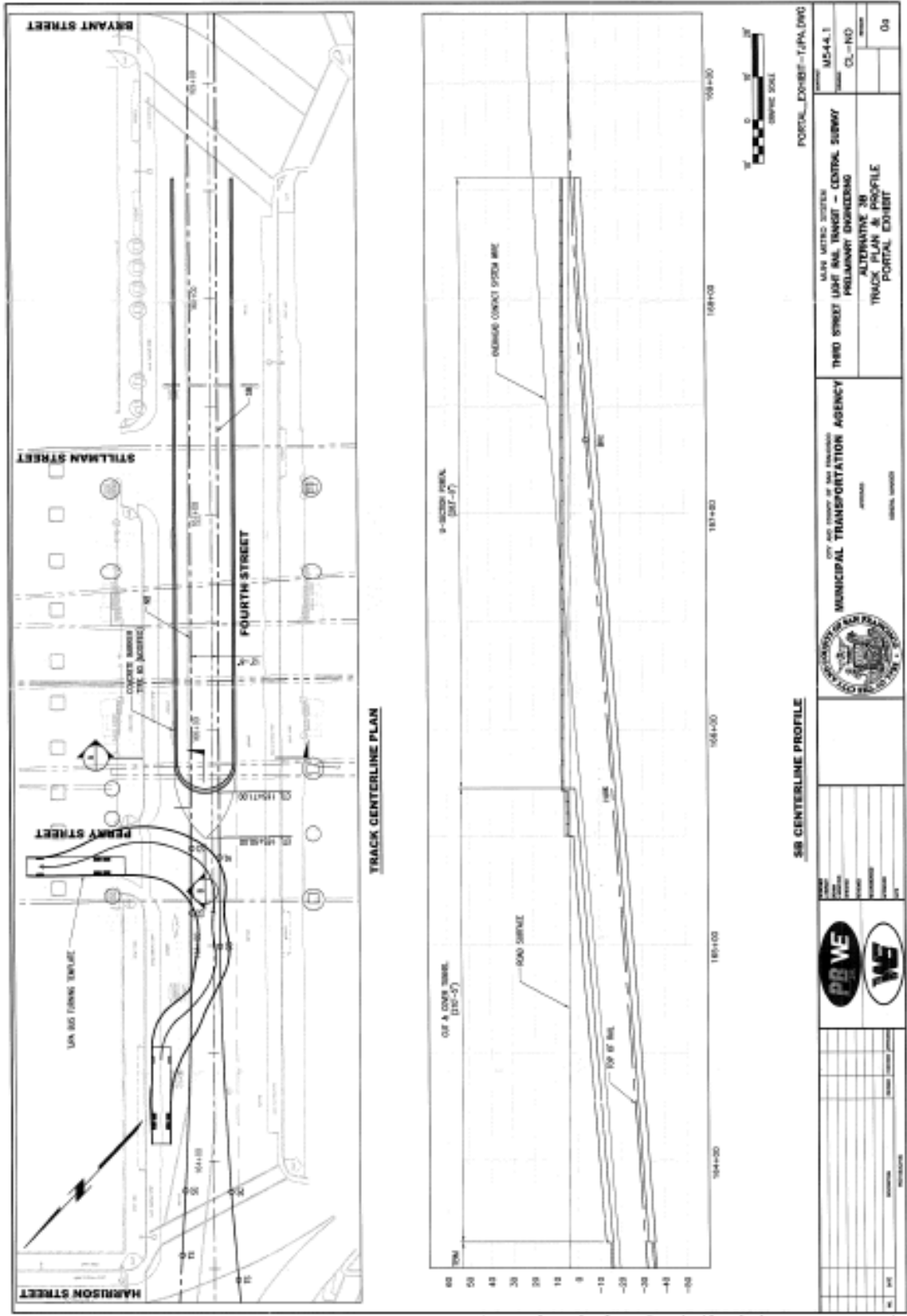


Alan R. Zahradnik
Planning Director

Attachment

c: CG Kupersmith, SC Chiaroni, DJ Mulligan, M Palumbo
Phil Sandri, TIPA

X-5
Cont.



Responses to Letter X

X-1

Comment regarding the acknowledgement of the Golden Gate bus storage facility at the Fourth and Perry site is noted.

X-2

See Response to Comment R-1. SFMTA is committed to continued close coordination with the TJPA and Golden Gate Transit for the interface between the Central Subway Project and the Transbay Transit Center Program, including the Bus Storage facility on Fourth Street. As noted on page 3-55, text changes have been incorporated into the SEIS/SEIR to reflect the revised location of the tunnel portal to accommodate bus access and the agreements reached.

X-3

A crash barrier is planned for the portal to protect the entrance structure from turning buses. The current tunnel portal layout plans provide space for the tunnel crash barrier without interfering with the turning path of the bus as it enters the bus storage facility. Figure 2-18 on page 2-39, Figure 2-19 on page 2-41, and Figure 5-10 on page 5-40 have been revised to show the tunnel crash barrier. See Response to Comment R-1 for revised figures.

X-4

The project construction would not impact any of the regular Golden Gate Transit bus routes as none of the Golden Gate Transit bus lines operate on Fourth or Stockton Streets in San Francisco. Construction on the segment of Fourth Street, between Bryant and Harrison Streets under Alternatives 3A and 3B, could temporarily affect access for empty Golden Gate buses entering the proposed Transbay Terminal bus storage facility at Fourth and Perry Streets. Under Alternative 2, the portal would be located to the south of the bus storage facility and would not have the same impacts.

Golden Gate buses would be entering the bus storage facility primarily after the morning peak period and would enter via Harrison, Fourth and Perry Streets. Generally, exiting from the site would occur prior to the start of the afternoon peak period via Perry and Third Streets. While a reduction in lanes is anticipated on Fourth Street between Bryant and Harrison Streets during the construction period for Alternative 3A or 3B, SFMTA plans to stage excavation shaft construction and utility relocation to maintain access to the bus storage facility by Golden Gate buses and will work with the Golden Gate Bridge Highway and Transit District (GGBHTD) to develop bus detour routing plans to ensure access. If access to the construction shaft is needed, it would be scheduled so as not to conflict with the periods

when buses are entering or exiting the bus storage site. The SFMTA is committed to continued coordination with the TJPA and GGBHTD to minimize construction impacts on Golden Gate Transit bus operations.

The impacts to the Golden Gate bus operations would be less-than-significant due to their temporary nature and the maintenance of access to the bus storage site during construction.

The following text changes and additions are proposed on pages 6-35 and 6-36 of the SEIS/SEIR to identify impacts to Golden Gate Transit buses and proposed mitigation measures.

The text of the second sentence, fourth paragraph, of page 6-35 is revised as follows.

“...At the tunnel construction shaft, Muni buses would be rerouted to the west side of Fourth Street between Bryant and Harrison Streets...

The following paragraph is added after the fourth paragraph, page 6-35:

“Excavation of the construction shaft under the I-80 Freeway between Bryant and Harrison Streets would also impact Golden Gate Transit bus operations under Alternative 3A. Buses will use Harrison, Fourth, and Perry Streets to enter the Transbay Terminal mid-day bus storage facility that is proposed for the site between Perry and Stillman Streets, east of Fourth Street. Generally buses would be entering the proposed Transbay Terminal bus layover facility after the morning peak commute period and exiting the site before the afternoon peak commute period (3 p.m.). The reduction in lanes on Fourth Street during the construction period would temporarily affect access to the bus storage facility.”

The text under Mitigation Measures for Alternative 3A on of page 6-36 is revised as follows.

“Mitigation measures would be same as those proposed under Alternative 2, except as described below. The MTA would continue to coordinate with the TJPA and Golden Gate Bridge, Highway and Transportation District (GGBHTD) to minimize construction impacts on Golden Gate Transit bus operations. MTA would stage excavation shaft construction and utility relocation to maintain access to the bus storage facility by Golden Gate buses and work with GGBHTD to develop bus detour routing plans to ensure continued access. If access to the construction shaft is needed, it would be scheduled so as not to conflict with the periods when buses are entering or exiting the bus storage site.”

The text revisions under Mitigation Measures for Alternative 3B on page 6-36 are revised as follows.

“Mitigation measures would be same as those proposed under Alternative ~~2~~3A.

The text of Less-Than-Significant-Impacts, Alternative 3A, Transit Construction, page 7-9 is revised as follows:

“5. Excavation of the construction shaft under the I-80 Freeway between Bryant and Harrison Streets would also impact Golden Gate Transit bus operations.”

The text of Improvement Measures, Alternative 3A, Transit Construction, page 7-9 is revised as follows:

“Same is Alternative 2, except SFMTA would coordinate with TJPA and GGBHTD to minimize construction impacts on Golden Gate Transit. SFMTA would stage excavation shaft construction and utility relocation to maintain access to the bus storage facility by Golden Gate buses and work with GGBHTD to develop bus detour routing plans for continued access. Access to the construction shaft would be scheduled to avoid conflict with the active bus periods.”

The text of Improvement Measures, Alternative 3B, Transit Construction, page 7-9 is revised as follows:

“Same as Alternative ~~2~~3A.”

X-5

See Response to Comment X-4 and text revisions proposed in the Transit Impacts section. Access to the proposed bus storage facility would be maintained at all times, though rerouting of buses may occur for limited periods of time.

Letter Y

December 8, 2007

Bill Wycko
Acting Environmental Review Officer
San Francisco Planning Department
Central Subway Draft SEIS/SEIR
1650 Mission Street, Suite 400
San Francisco, CA 94103

RECEIVED
DEC 10 2007
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Dear Mr. Wycko,

These are my comments on the Central Subway Draft SEIS/SEIR.

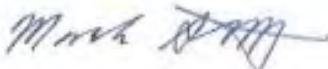
Among the design alternatives considered in this document, I strongly support **Alternative 3B** (Modified LPA) as the best and most cost-effective choice. I would like the following suggestions entered into the record:

1. Union Square/Market Street Station—station entrances: I support the proposed choice of the southeast corner of Union Square for the main entry, with a second set of stairs in the sidewalk on the north side of Geary Street east of Stockton. The latter will provide direct transfer access from the station to *outbound* buses on the 38 and 38L Geary lines. My suggestion is to include an additional set of stairs in a sidewalk bulb-out along the south side of O'Farrell Street just east of Stockton Street. This would provide direct transfer access into the station from *inbound* buses on the 38 and 38L Geary lines (which have a stop on that block). I think it would be a significant misjudgment to not maximize connectivity with these high-volume lines in both directions. Because the station is currently envisioned to have a full-length concourse, a stair entry at this corner should be a cost-effective means of facilitating these connectivity goals.

2. Moscone Station—station entrances: In addition to the proposed off-street, main entrance between Clementina and Folsom Streets, I'd suggest consideration be given to including the secondary entrances originally proposed in Alternative 3A: a stair entry in the west sidewalk of Fourth Street north of Howard Street and an escalator entry in the north sidewalk of Howard Street west of Fourth Street (Fig. 2-13). I think that this corner—with its wide sidewalks and being centrally located at the meeting of the 3 blocks of the Moscone Center—would represent a missed opportunity if not used for station access. The greatly increased station visibility would be a benefit that (I hope) would justify the added cost of extending a passageway northward from Alternative 3B's shortened concourse to provide access at this corner.

3. Off-street entrances at Moscone and Chinatown stations: I suggest that the designs of these 2 off-street entrances accommodate the option of locating the fare gates and ticket vending machines inside the street-level entry areas, near the top of the stairs, as an alternative to locating fare gates on the concourse levels. This would place more of each of these stations, including the main stairs and escalators, behind fare barriers, thus increasing system security and reducing opportunities for vandalism.

Sincerely,



Mark Scott
358 Frederick St., Apt. 3
San Francisco, CA 94117

Y-1

Y-2

Y-3

Y-4

Responses to Letter Y

Y-1

Comment expressing support for Alternative 3B is noted.

Y-2

Comment supporting the access point in Union Square from Geary Street is noted. The number of access points at the subway stations was reduced to save costs for the project. The current design for Union Square Station Alternative 3B meets capacity and emergency access requirements for the project. Stair access would be provided on both the east and west sides of Geary Street and escalator and elevator access along the south side of Union Square along Geary Street. These entrances would be located near existing Geary 38 bus stops for ease of transfer. An additional stairway entry along O'Farrell Street would be cost-prohibitive at this time because available funding for the Central Subway Project is limited.

Y-3

See Response to Comment Y-2. In early discussions with regarding the location of access points to the Moscone Station, representatives from the Moscone Center indicated that a station access directly connecting to the convention center at the northwest corner of Fourth and Howard Streets would present security issues. In addition, an existing sewer trunk line under Fourth Street between Howard and Mission Streets would interfere with station construction in this area. (See pages 2-59 through 2-61 of the SEIS/SEIR.)

Y-4

The design team evaluated the potential for locating the fare gates and ticket vending machines at the street level and determined that the queuing requirements could not be accommodated in the limited surface area space at street level. In addition, MTA has a station agent at each station concourse level and fare gates are collocated with the station agent booth for security and passenger assistance purposes.

Memo Z



Gavin Newsom | Mayor
 Rav. Dr. James McCray Jr. | Chairman
 Tom Nolan | Vice-Chairman
 Cameron Beach | Director
 Shirley Broyer Black | Director
 Wil Din | Director
 Peter Meney | Director
 Leah Shahum | Director
 Nathaniel P. Ford, Sr. | Executive Director/CEO

Date: December 10, 2007
To: Bill Wycko, City Planning
From: Peter Straus, SFMTA Muni Service Planning
Subject: Comments – Central Subway Draft Supplemental EIS/EIR, Oct 2007

1. Annual Operating Statistics

- a. **Tables S-2, 2-2, 2-4 and 2-6** – There is confusion in the column headings over use of "Systemwide." After talking with Dan Rosen, I suggest the following:

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand (Fleet Size) ³	Total Annual LRV Car Hours T Line (Systemwide) ³
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2. Abbreviations – In text need to explain what an abbreviation means, but also in tables need to spell out abbreviations

- a. **Executive Summary Table S-3 and page S-13** – Need to explain what "YOE" means
- b. **Chapter 8 Table 8-1** – Need to explain what "YOES" means.

3. Appendix E

- a. **Tables E-1 & E-2** –
 - i. Three footnotes (1), (2), (3) are missing
 - ii. There is no plausible explanation for the sharp drop in the 30 and 45 line patronage between the year 2000 and the 2030 No Project/TSM Alternatives. In the Central Subway January 2007 model run, as shown in Tables E-1 and E-2, the 2030 No Project/TSM 30/45 Line patronage is less than half that of the year 2000 patronage. In the No-Project/TSM Alternative, the T-Third Line runs along the Embarcadero and in the Market Street subway, and does not directly serve the 3rd/4th/Stockton/Columbus corridor between Townsend and Chinatown/North Beach/Russian Hill/Cow Hollow and the Marina. Consequently, there is no reason why there should be a drop in patronage or in service levels for the 30 and 45 Lines.
- b. **Tables E-3 and E-4** – Are the estimated daily transit ridership trip origins and destinations for the existing or future conditions?

San Francisco Municipal Transportation Agency
 San Francisco Municipal Railway | Department of Parking & Traffic
 One South Van Ness Avenue, Seventh Fl. San Francisco, CA 94103 | Tel: 415.701.4500 | Fax: 415.701.4430 | www.sfmta.com

Z-1

Z-2

Z-3

Z-4

Z-5

Responses to Memo Z

Z-1

The following text changes suggested by the Muni Service Planning Section are incorporated into the column headings for Table S-2, page S-12; Table 2-2, page 2-23; Table 2-4, page 2-35, and Table 2-6, page 2-48 of the SEIS/SEIR:

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (Systemwide-Fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand ³ (Systemwide-Fleet size) ^{4,3}	Total Annual LRV Car Hours T-Line (Systemwide)
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Z-2

The following changes suggested by the Muni Service Planning Section are incorporated into the text.

The text of the footnote in Table S-3, page S-13 is revised as follows.

“Costs for Alternatives 3A and 3B do not include the North Beach Construction Variant, which is estimated to costs \$54 million in Year of Expenditure (YOE) dollars.”

The text of the second paragraph of page S-13 is revised as follows.

“As indicated in the total capital cost for the Enhanced EIS/EIR Alignment, including the purchase of four additional LRVs (3 peak and 1 float vehicle) to accommodate 2030 demand is estimated at \$1.345 billion (\$1.685 billion in Year of Expenditure (YOE)). The total capital cost for the Central Subway Fourth/Stockton Alignment Option A is estimated at \$1.131 billion (\$1.407 billion in YOE) and the total capital cost for the Fourth/Stockton Alignment Option B is estimated at \$1.014 billion (\$1.235 billion in YOE).”

The text of the first sentence, first paragraph of page 8-7 is revised as follows.

“The projected incremental operating costs for both the T-Third line (IOS) and Central Subway Alternatives are summarized in Table 8-2 in year of expenditure dollars (YOE).”

The following footnote is added to Table 8-2, page 8-7.

“Note: YOE is Year of Expenditure.”

Z-3

The following changes suggested by the Muni Service Planning Section are incorporated into the text.

The following footnotes are added to Table E-1 and E-2 in Appendix E.

“Notes: ¹ Central Subways T-Third long-line to Visitacion Valley and T-Third short-line to 18th and Third Streets.
² 15-Third Line shifts to 9X-San Bruno or to the T-Third line.
³ 45 Union/Stockton extended into Mission Bay.”

Z-4

The ridership for the existing year and the future years has been revised based on new model runs from the updated SF model (see revisions incorporated into Tables E-1 and E-2 in the SEIS/SEIR). The updated results show that there would be an increase in ridership between 2000 and 2030 on the 30-Stockton and 45-Union/Stockton lines for the No Project/TSM Alternative as suggested by the commenter.

Z-5

The estimated transit ridership in Tables E-3 and E-4 is projected for the year 2030.

The text of the titles of Tables E-3 and E-4 are revised as follows.

“ESTIMATED 2030 DAILY TRANSIT RIDERSHIP”

Letter AA

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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.



December 10, 2007
Via facsimile 415/558-6409

William Wycko
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street #400
San Francisco, CA 94103

Re: Draft Supplemental Environmental Impact Statement / Environmental Impact Report ("SEIS/SEIR") and Section 4(f) Report ("4F Report") Central Subway Project (Phase 2) (State Clearinghouse No. 96102097)

Dear Mr. Wycko:

This letter sets forth the comments of the Telegraph Hill Dwellers ("THD") on the Draft Supplemental Central Subway SEIS/SEIR prepared on behalf of the U.S. Department of Transportation and San Francisco Planning Department ("Lead Agencies") for the project sponsor, the San Francisco Municipal Transit Agency ("MTA"), to analyze the environmental impacts of the proposed Central Subway project. This letter does not express opposition to a Central Subway Project, but is intended to articulate our concerns with the adequacy of the SEIS/SEIR to address the environmental impacts of the proposed project on our community. By way of introduction, THD is a non-profit organization incorporated in 1956, currently representing over 800 residents from the Telegraph Hill, North Beach, and Chinatown neighborhoods. One of San Francisco's oldest community organizations, THD was founded to perpetuate the historic traditions of these areas and has been actively involved with land use issues affecting northeast San Francisco for over five decades.

OVERVIEW

This is a brief overview of THD's concerns, followed by specific comments. Even within the constraints of the Supplemental analysis, given the scope and methods of the previous FEIS/FEIR, the Alternatives are overly narrow. They do not adequately address the broader needs set out by the document to serve northeast San Francisco and transit-dependent populations, even limited to the northeast segment of the Corridor.

The study of the Chinatown and North Beach neighborhoods is exceptionally limited, at odds with the purported purpose of the subway line, and the purpose of the SEIS/SEIR to disclose and mitigate project impacts and evaluate alternatives. Analysis of construction impacts and, most importantly, management of construction impacts is requisite for an undertaking of this magnitude; this is beyond a basic mitigation monitoring plan.

AA-1

AA-2

William Wycko
December 10, 2007
Page 2

The Federal requirements under Section 4(f) to avoid adverse impacts to historical resources are not addressed by the alternatives, which all include given impacts in Chinatown, and Alternative 3B to North Beach. While such impacts might be routinely the subject of CEQA overriding considerations in the City and County's jurisdiction, no such mechanism exists under 4(f) when reasonable options exist to avoid these impacts.

AA-3

PURPOSE AND NEED

The underlying "Need" defines the objective criteria for development of alternatives. The findings supporting the Record of Decision must be based on the "Needs" as set out in the document. As stated in Section 1.3, the "Needs" for the project, to year 2030, include:

"mobility and transit deficiencies in the northeastern part of San Francisco" to be met with improved:

- **"connections to communities in the southeastern part of the City"**, and
- **"reliability of transit service"**;

"congestion" and **"mobility needs for new jobs"**, throughout the **"Study Area"** to be met with:

- **"infrastructure improvement"** (Central Subway would be a key improvement to ease congestion);

"the large transit-dependent population" of the **"Corridor,"** to be met with improved

- **"transit service"**; and

"South of Market area" residential growth accommodation.

The "Needs" Statement raises several questions:

- 1) **Affected Environment.** The SEIS/SEIR fails to meet the **Need** to address "northeastern," "southeastern," or "South of Market" by limiting the Study Area as "generally within a two block radius of the Corridor" (3.1).
- 2) **No methodology** is presented to explain how the affected environment of the Corridor represents the areas described in the needs statement, for purposes of study, let alone how the project improvements would actually serve the extent of the areas defined by the Needs Statement.
- 3) **Growth Accommodation.** Exactly what residential and/or commercial development is anticipated to be accommodated by the proposed Subway?

AA-4

AA-5

ALTERNATIVES

The statement of underlying Needs should determine the range of alternatives in an EIS/EIR.

AA-6

William Wycko
 December 10, 2007
 Page 3

- | | |
|---|---------------|
| <p>4) Needs Statement. The guiding parameter for creation and evaluation of alternatives is the Needs Statement. The SEIS/SEIR fails to link the material it presents back to the needs identified to improve service to northeast and southeast San Francisco and the South of Market area.</p> | AA-6
Cont. |
| <p>5) Area Extent. Irrespective of how alternatives were developed, how were project improvements evaluated in the alternatives in terms of the extent of the areas defined by the needs statement?</p> | |
| <p>6) Avoidance of Impacts to Historic Resources. The Alternatives fail to include options to avoid significant impacts on historical resources. What are the options for alternative station siting in Chinatown to avoid the demolition of historic structures? What are the options for alternative locations for the Tunnel Boring Machine to come out of the ground to avoid adverse temporary and/or permanent impacts to Washington Square Park (Landmark No. 226) or on other historic resources identified by the North Beach Survey and/or determined eligible for the National Register of Historic Places in North Beach? Were alternative locations to avoid these potential adverse impacts considered as required by Section 4(f), CEQA and NEPA?</p> | AA-7 |
| <p>7) Transit-Dependent Persons. The project would serve those already residing on an existing transit corridor. How were the actual needs of transit-dependent persons considered in the alternative analysis? Of people throughout the Study Area?</p> | AA-8 |
| <p>8) Equity. Is accessibility equity, to address mobility needs, a consideration? How do the alternatives evaluate equity for transportation-dependent persons in the North Waterfront and North Beach, some of whom are within the Study Area? South of Market? Southeastern San Francisco?</p> | AA-9 |
| <p>9) Limitation of Service Area. The tunnel alternatives excavate to North Beach without serving the Study area with a North Beach Station, or continuation to Fisherman's Wharf; given the investment in the tunnel, why were alternatives with linkages to North Beach and the North Waterfront, serving stated needs, residents, and tourists, not considered in favor of a dead-end to the southern half of Chinatown?</p> | AA-10 |
| <p>10) Street-level Alternative. An alternative to the action would be using the critical Federal money to finance an above ground alternative as recommended by Regional Alliance For Transit (RAFT).</p> | AA-11 |

TRANSPORTATION

The impact analysis, disclosure, and construction management plan should dwarf the presentation of the project and existing affected environment. In this case, not even the whole of the affected environment, half of Chinatown and all of North Beach, has baseline information presented with which to perform the analysis, disclosure, and mitigation management required. The emphasis of the document is inverted from the purpose it serves.

- | | |
|--|-------|
| <p>11) Transit Preferential Streets. "Transit Preferential Streets" (TPS) Improvements Areas noted include Stockton Street/Columbus Avenue and Market Street. Where are</p> | AA-13 |
|--|-------|

William Wycko
 December 10, 2007
 Page 4

- | | |
|--|----------------|
| <p>the improvements for Stockton Street/Columbus Avenue? How is a connection gap at Market Street (to Union Square) an improvement?</p> | AA-13
Cont. |
| <p>12) Transit Demand. The project would make the pedestrian level of service of Stockton at Washington <u>worse</u>, not better. Although the demographics of Chinatown, as more dense and projected to grow, are used rationalize the limited service of the proposed Subway, Chinatown is not served well without relief to the north, which has worse existing LOS conditions than the area the Subway would serve. With the immense expense of the Subway, why does the project does not address the areas of greatest transit demand?</p> | AA-14 |
| <p>13) Existing Transit Corridor. The Subway would serve a corridor already served by transit. How would the project be meeting an underserved need for mobility throughout the Study Area? Throughout the areas described in the needs statement?</p> | AA-15 |
| <p>14) Evidence. The SEIS/SEIR does not show the existing bus stops, in all of the "Affected Environment" material presented, nor indicate where there would be specific relief with the Subway project, in the impact or alternative analysis. No methodology beyond boarding counts is presented; there is inadequate information presented to evaluate the SEIS/SEIR.</p> | AA-16 |
| <p>15) Pedestrian Level of Service. The existing pedestrian level of service of Stockton to Washington is described as LOS A. At what time of day were counts made?</p> | AA-17 |
| <p>16) LOS through the more congested stretch of Stockton between Columbus and Broadway/Washington is not addressed; as part of the Corridor, why not?</p> | AA-18 |
| <p>17) Chinatown, North Beach Corridor. The SEIS/SEIR does not present or analyze traffic or LOS in Chinatown or North Beach areas, <u>within the Corridor</u> described as the Study Area, for existing, projected, or construction conditions of the affected environment, and thus the SEIS/SEIR is plainly inadequate. Stockton/Post is not in Chinatown. The SEIS/SEIR fails to present <u>any</u> analysis of traffic north of Union Square.</p> | AA-19 |
| <p>18) Vehicular Level of Service. How will the subway affect existing conditions of Stockton to Columbus and Columbus Avenue?</p> | |
| <p>19) Intersection LOS is presented for "only for intersections" that would be projected to operate at E or F. However, Chinatown is not studied, so this SEIS/SEIR statement cannot be supported.</p> | |
| <p>20) Loading. The SEIS/SEIR does not present or analyze loading, within the in Chinatown or North Beach areas of the Corridor described as the Study Area, for existing conditions of the affected environment.</p> | |
| <p>21) Projected loading conditions. On-street parking spaces, counted on Stockton from Clay to Washington Street, do not describe loading spaces or loading conditions. Projected conditions are described in terms of "loss of existing" and attesting to "already nearby loading zones", but there is no information presented to substantiate that conclusion.</p> | AA-20 |
| <p>22) Construction conditions include, under 3B, the Tunnel Boring Machine (TBM) retrieved "from a shaft in the middle of Columbus Avenue" and truck traffic for spoils will involve land closure for a period of "six months" to "the full duration of construction;" however, the impacts on loading and on business activity is not described; the SEIS/SEIR is plainly inadequate.</p> | AA-21 |

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- 23) **Parking.** The SEIS/SEIR does not present or analyze parking conditions or impacts within the Corridor described as the Study Area, for **existing, projected, or construction conditions** on the affected environment and, therefore, the SEIS/SEIR is plainly inadequate. On-street parking spaces, counted on Stockton from Clay to Washington Street, do not describe conditions sufficiently to analyze the impacts of project construction.

AA-22

AFFECTED ENVIRONMENT

The Needs Area is not matched by the Study Area, and little of either is captured in the Corridor. The Corridor cannot be used as a surrogate for describing benefits realized (or not) for the Needs or Study Areas.

- 24) **Study Area.** The SEIS/SEIR variously describes the **Study Area** as shown on Figures 1-1 (p. 1-3) and 1-2 (p. 1-7), as the MTC Travel Zones/Census tracts (locations not shown) (p. 1-6), as “generally within a two block radius of the Corridor”(3.1).
- 25) **Affected Environment.** The SEIS/SEIR does not address “northeastern”, “southeastern”, or “South of Market” although these areas are defined in the needs statement. Instead, it limits the **Study Area** as “generally within a two block radius of the Corridor”(3.1).
- 26) **Chinatown.** Stockton/Broadway is indicated as part of North Beach, and thus not served by the proposed subway (1-6). However, Chinatown straddles Broadway; thus, over half of Chinatown is not included in the service area definition required by the needs statement(s).
- 27) **CAG and Affected Area.** “The MTA established a Community Advisory Group (CAG) early in the planning process to provide input to the identification and selection of design options for the Third Street Light Rail Project and to help select the options to carry forward for environmental review. The CAG is composed of a broad cross-section of stakeholder groups from the six primary neighborhoods in the Third Street Corridor: Visitation Valley, Bayview Hunters Point, Potrero Hill, South of Market, and Chinatown/Downtown. The CAG has met six times since December of 2003 to discuss the Central Subway phase of the Project.” The North Beach / Telegraph Hill neighborhood should have had representation on the CAG.

AA-23

AA-24

PLAN CONSISTENCY

Plan consistency is a Federal requirement.

- 28) **Plans.** How is the project consistent with the SFCTA Strategic Plan’s identification of “North Beach” as one of the Four Corridors for upgrades with “fixed guideway transit lines”? (4-13)

AA-25

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|---|-------|
| 29) How is the project consistent with the Port's Waterfront Land Plan's overarching goal "to reunite the City with its [northern] waterfront? (4-14) | AA-26 |
| 30) How is the project partially consistent with the Northern Waterfront Land Use Plan guidance to provide "maximum access" and "accommodate the movement of people," ...by "improving transit service between Fisherman's Wharf and China Basin"? (4-5) | AA-27 |
| 31) How is the project consistent with the San Francisco General Plan, Transportation Element , to provide fixed guideway transit to the North Beach corridor? (4-2) | AA-28 |
| 32) How is the project consistent with the San Francisco General Plan, Commerce & Industry Element , to support the tourist industry? (4-2) | AA-29 |
| 33) How is the project consistent with the Chinatown Plan to meet Chinatown's need for better East-West transit links? (4-2) | AA-30 |

CONSTRUCTION IMPACTS

Although limited in duration, these are the most pronounced and widely disruptive of any impact of the project. Without a comprehensive construction management plan to address circulation, in concert with the transit, service, and utility infrastructure, this will bring chaos and serious impacts on local businesses. Standard dust control and noise ordinances are insufficient to address a project of this magnitude. There is no substantive discussion of the effects of noise, dust, or vibration on sensitive receptors, or mobility impedances for this same population. No discussion of the impact on or relief to affected businesses is discussed.

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| 34) Economic impacts. The SEIS/SEIR does not present or analyze area business patronage generally, and discussion regarding construction impacts on business is virtually absent. | AA-31 |
| 35) What would the impact be on Chinatown and North Beach area businesses? There were enormous disruptions after the 1989 earthquake. | AA-32 |
| 36) What protections are in place for the economic impacts, yet to be described in the SEIS/SEIR? | AA-33 |
| 37) Transit. Where is the comprehensive construction management plan to address coordination of route changes, truck movements, public information, etc? | AA-33 |
| 38) Affected Area. The extent of impacts, given the changes to transit routes and street closures, extends beyond the two-block buffer of the alignment. The SEIS/SEIR is not adequate for the limitation of the affected area (were it) addressed in this regard. | AA-34 |
| 39) Debris and street closures. Dirt will be pushed out right by Washington Square; what portions of the street would be closed for how long, what that would do to traffic, how would the equipment be removed, how many people would be working there and what debris might be cast off by the construction in that area? What assurance is that that the construction equipment will not be stored in Washington Square or impact the public use of this Landmark public park? | AA-35 |
| 40) Sensitive Receptors. The SEIS/SEIR does not present or analyze the presence of sensitive receptors ; the SEIS/SEIR discussion is thus inadequate in discussion of | AA-36 |

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- noise, dust, recreational impacts**, and impact of travel impedances, as these affect a vulnerable population. The **environmental justice** discussion is also incomplete for this reason. AA-36
 Cont.
- 41) **TBM impact concentrations.** Chemical contaminants possibly already in the soil are outlined but not the environmental consequences of the Tunnel Boring Machine being extracted at Washington Square. AA-37
- 42) Being that the Tunnel Boring Machine will come out of the ground at Washington Square Park wouldn't the noise level be higher? AA-38
- 43) The truck trips are not enumerated for the TBM and Washington Square Park activities. AA-39
- 44) **Emergency Access.** The SEIS/SEIR does not adequately describe impacts to police and fire response; even if there will be a plan developed in the future, there needs to be some characterization of impact presented. AA-40

SECTION 4(F)

- Avoidance alternatives are required under Section 4(f), however, the historic resources slated for demolition on Stockton Street are not considered "takes." The effects on Washington Square Park and historic district resources are not considered for appropriate protection. AA-41
- 45) **Construction impact avoidance.** No measures are identified for protection of resources, as part of avoidance, under 4(f).
- 46) **Alternatives which avoid impacts are required under 4(f).**
- 47) **Washington Square Park** is City Landmark No. 226. "At the TBM retrieval shaft in Columbus Avenue at Washington Square, the roadway (originally Montgomery Avenue) was cut through between 1873 and 1875, bisecting Washington Square. Deposits related to the early years of Washington Square as a public space and park may be present." These are avoided, protected, preserved how? And how would the landscape of the Park and Columbus Avenue, including the street trees and trees in the park be protected and impacts avoided? AA-42
- 48) An **Alternative** which makes use of the unimproved lot on Stockton at Clay Street for the station would not require the demolitions to historic resource buildings on Stockton Street. If the rationale is that the lot was not originally studied or included in the original APE, it is specious to assert one (1) lot cannot be evaluated for archeological/cultural resource concerns as an addition to this Supplemental document. AA-43
- 49) An **Alternative** which returns Stockton Street to a streetcar-only street, as it was when the Stockton Tunnel was constructed, and to allow loading and emergency access, would allow the investment of Federal monies to extend a surface streetcar all the way to Fisherman's Wharf, arguably serving San Francisco much better than the dead-end subway proposed. This would not require the demolitions to resource buildings on Stockton Street or impacts to Washington Square. AA-44

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ADEQUACY

In light of the SEIS/SEIR omissions in the alternatives and analysis, the document does not meet the tests for legal adequacy, let alone fairness that our neighborhood deserves.

- 50) **Alternatives.** The SEIS/SEIR fails to demonstrate that it studied impacts or alternatives for the whole of the affected area described by the needs statement to support findings. AA-45
- 51) **Existing Affected Area.** The SEIS/SEIR fails to present existing conditions, impact analysis, or alternative consideration for at least half of the area of Chinatown (north of Broadway), Chinatown being, ostensibly, a fundamental area of concern for expansion of the light rail. AA-46

If our community is to consider the TBM being extracted in North Beach, let alone at Washington Square Park, without the benefit of service, no less than complete discussion of environmental consequences and comprehensive plan to manage impacts is acceptable. AA-47

We believe feasible alternatives exist which should be considered, as they avoid impacts as required by 4(f).

We look forward to receiving the Comments and Responses prepared for the Draft SEIS/SEIR.

Sincerely,

Vedica Puri
 President

CC: Nathaniel P. Ford, San Francisco Municipal Transportation Agency
 Leslie T. Rogers, U.S. Dept. of Transportation, Federal Transit Administration
 Ray Sukys, U.S. Dept. of Transportation, Federal Transit Administration
 Joan A. Kugler, San Francisco Planning Department

Responses to Letter AA

AA-1

While Telegraph Hill and North Beach are located in the northeastern quadrant of San Francisco, they are identified in the 1995 *Four Corridor Plan* (San Francisco County Transportation Authority) as a future transit corridor, following development of the Third Street Light Rail and Central Subway. North Beach is shown as part of the Central Subway study area (Figure 1-2) to include evaluation of the option of an underground construction tunnel to Columbus Avenue in North Beach for purposes of extracting the Tunnel Boring Machine upon completion of the tunnel construction.

Consistent with the certified 1998 Third Street Light Rail Final EIS/EIR, and with the adopted *Four Corridor Plan*, the Central Subway revenue service would terminate at the station in Chinatown at Stockton and Jackson Streets. SFMTA's objective for the proposed Project is to complete the second phase of the Third Street Light Rail Project and provide Muni transit improvements in the Central Subway corridor (page 1-3 of the Purpose and Need). The Third Street Light Rail Project stated a "need" to address deficiencies in the transit system serving the communities in the southeastern part of San Francisco, including deficiencies that exist at present and those that are anticipated to exist during the 20-year planning horizon. Connections between Bayview Hunters Point and Visitacion Valley with Downtown and Chinatown and to regional transit services were an important part of the definition of "need" for the light rail project.

The reference to the use of transit deficiencies in the "northeastern part of San Francisco" on pages S-3 and 1-4 of the SEIS/SEIR has been revised to read "northeastern and southeastern" for consistency with the original need statement. This was the basis for defining alternatives in the original Third Street Light Rail Project EIS/EIR, including the Phase 2, Central Subway. This is also consistent with the definition of the terminus of the Central Subway Project in the vicinity of Stockton and Jackson Streets in Chinatown, as defined in the September 2006 Notice of Preparation (NOP), which was used to define the alternatives for the SEIS/SEIR.

The first sentence, first paragraph, page S-3 is revised as follows:

"The Central Subway Project would help to address mobility and transit deficiencies by improving connections to communities in the northeastern and southeastern parts of the City and improving reliability of transit services."

The first sentence, last paragraph, page 1-4 is revised as follows:

“The Central Subway Project would help to address mobility and transit deficiencies by improving connections to communities in the northeastern and southeastern parts of the City and improving reliability of transit services.”

AA-2

See Response to Comment AA-1 above. The impact analysis for the North Beach area is focused on potential impacts to traffic, transit, park land, cultural resources (archaeological resources and historic properties), noise and vibration and biology for the temporary construction tunnel that would extend to Columbus Avenue in North Beach for the purpose of extracting the Tunnel Boring Machine (TBM). The potential impacts from this underground tunneling activity and one-week extraction of the TBM were analyzed and were found to be less-than-significant and would be further minimized by mitigation measures defined in the SEIS/SEIR. Potential impacts to Chinatown are not limited, and are described in detail in the document in Chapters 5.0 and 6.0. The management of the mitigation monitoring program is described in the Mitigation Monitoring and Reporting Program (MMRP) attached to this Final EIS/EIR as Appendix I. SFMTA will have overall responsibility for ensuring that all mitigation measures are implemented and that compliance is reported to the Planning Department on a quarterly basis.

The Appendices of the SEIS/SEIR are revised to add the Mitigation Monitoring Reporting Program as Appendix I.

AA-3

The 2005 revision to the federal regulations that govern Section 4(f) reporting described on page 10-8 of the SEIS/SEIR allows a finding of de minimis impacts when the activities, features, and attributes of the 4(f) resource would not be adversely affected. Concurrence from the Department of Recreation and Parks for the minor impacts to Union Square and Washington Square parks is attached as Appendix J. FTA concurs with this finding (Appendix J).

The Appendices of the SEIS/SEIR, Volume I, are revised to add the Recreation and Park Commission de minimis finding as Appendix J.

AA-4

See Response to Comment AA-1. Reference to the mobility and transit deficiencies in the “northeastern” part of San Francisco has been added to a reference to “southeastern” part of the city for consistency with the need statement in the Final EIS/EIR for the Third Street Light Rail Project. The mobility and transit

deficiencies relate to the Bayview/Hunters Point residents in the southeastern neighborhoods of the City and the need for improved transit connections with Downtown, Chinatown and transit systems that serve the region (BART and Caltrain). The affected environment for the Central Subway analysis of potential impacts is consistent with the study area established for the subway segment of the Third Street Light Rail for the 1998 EIS/EIR. The alternatives in this SEIS/SEIR have been expanded to include the Fourth Street corridor (Alternative 3 A and B) added as a result of public scoping. Each of the evaluations performed for the environmental categories (as detailed in Chapters 3.0, 5.0, and 6.0) looked at an impact area that was appropriate for that environmental resource.

AA-5

The population and employment growth between the year 2000 and 2030 is shown on Table 1-1, page 1-6, and identifies the projected growth for the Central Subway Corridor. The greatest growth is projected in the Mission Bay development and in the South of Market area. The Central Subway Project traverses this growth area and would provide transit connections to regional transit (BART, Caltrain) and other Muni lines, however, other areas along the Third Street corridor will also benefit by being able to access Downtown and Chinatown.

AA-6

While the Central Subway Corridor is served by major bus lines, surface congestion, particularly along Stockton Street, results in unreliable service and delays for transit passengers. As stated on page 1-4 of the SEIS/SEIR, the Central Subway Project would help to address mobility and transit deficiencies by improving connections between the southeastern and northeastern part of the City and improving reliability of transit services. The goals of the Central Subway Project include: improving transit in the Central Subway Corridor to enhance the mobility of corridor residents, business people, and visitors; bringing transit service in the Central Subway Corridor to the level and quality of service available in other sections of the city; and to support economic development within the South of Market, Downtown, and Chinatown Study Area. By reducing transit travel times along the corridor and improving service reliability, all of the build alternatives of the Central Subway Project would meet the stated project goals and Purpose and Need as summarized above.

The alternatives analyzed in the SEIS/SEIR are consistent with those identified in the Notice of Preparation (NOP) dated September 20, 2006 (Appendix B) and presented to the public at scoping meeting and public information meetings. Alternative 2 was modified to meet current fire and safety codes, but otherwise is the same subway corridor as analyzed in the Final EIS/EIR for the Third Street Light Rail Project in 1998. Section 2.4 Project Development History, page 2-52 to page 2-62, describes

the full range of alternatives assessed during project development and the environmental review process. Transit reliability, connectivity with other transit lines, increases in traffic congestion, which relate to the overall goals of the Project and the Purpose and Need are addressed in Chapter 3.0, Transportation, for the No Project and for each of the subway alternatives.

AA-7

Measures to minimize harm to Section 4(f) resources (including the two buildings in Chinatown that are potentially eligible for the NRHP as contributors to the potentially eligible Chinatown Historic District, and Union Square Park, Washington Square Park and Willie “Woo Woo” Wong Playground) are described on pages 10-46 to 10-49 of the SEIS/SEIR. Implementation of these measures would reduce the potential impacts to resources to minor resulting in a de minimis finding for Section 4(f) and would not require analysis of avoidance alternatives. Impacts to historic properties are described in Sections 5.4.1 and 6.7.2 of the SEIS/SEIR. Demolition of either of the buildings in Chinatown for station development would constitute a significant adverse effect that will require a statement of overriding considerations at the time of project adoption.

AA-8

As stated in Chapter 1.0, Purpose and Need on page 1-5 of the SEIS/SEIR, the population along the Central Subway Corridor has a higher percentage of transit dependent population than the city average; 72 percent of households along the corridor are without a car compared to 29 percent citywide. The unemployment rates on the corridor at 9 percent are also higher than the citywide average of 4.6 percent. While the corridor is served by major bus lines, the surface congestion, particularly along Stockton Street, results in unreliable service and delays for transit passengers. The goals of the Central Subway Project, as they relate to the Purpose and Need, include: improving transit in the Central Subway Corridor to enhance the mobility of corridor residents, business people, and visitors; bringing transit service in the Central Subway Corridor to the level and quality of service available in other sections of the city; and to support economic development within the South of Market, Downtown, and Chinatown Study Area. By reducing transit travel times along the corridor and improving service reliability, the Central Subway Project is meeting the stated project goals and Purpose and Need as summarized above.

AA-9

See Response to Comment AA-8 for discussion of equity and mobility issues and Response to Comment AA-1 for background on city’s investment priorities for transit corridors in the city. The project is intended to enhance transit service in the Central Subway Corridor with improved connections from Visitacion Valley and the Bayview to South of Market and Chinatown and also improved access to jobs

in the South of Market and Downtown. Improving transit and providing enhanced mobility for the transit-dependent population along the corridor addresses environmental justice issues by bringing the service to the level of transit in other sections of the City. The improvement of service to the Northern Waterfront and North Beach are not stated objectives for the Central Subway Project.

AA-10

See Response to Comment AA-1 for discussion of why the northern boundary of the project was set at Jackson Street. The extension of the TBM extraction tunnel into North Beach would facilitate a possible future connection to North Beach, but would be subject to an independent study and environmental review as the rail extension project has not advanced to the design stage at this time, though it is identified as a future project in the San Francisco County Transportation Authority 1995 *Four Corridors Plan*.

AA-11

An above ground alternative was considered in the project development phase, but was rejected from further consideration in the SEIS/SEIR as it would not appreciably reduce travel times due to surface traffic congestion and traffic control devices intended to manage vehicle flows on surface streets (see page 2-52 of the SEIS/SEIR for Project development history).

AA-12

The study area for the Central Subway was set in consultation with the Planning Department and the FTA based on the potential impact area for the proposed project. As the rail project runs along and under existing city streets in a fully-developed urban area, the impacts area was defined within two-blocks of either side of the rail corridor. The impact area was expanded to include a broader area when warranted by a specific impact; for example, the potential impact of the project on population and employment or on the larger Chinatown Historic District and the construction impacts on North Beach were considered. The majority of the SEIS/SEIR in Chapters 3.0, 5.0, and 6.0 presents findings of the impact analysis and follows a standard format for preparation of an SEIS/SEIR as identified by the Planning Department and by FTA.

AA-13

See Response to Comment I-2. The diamond lane outlined in the Transit Preferential Streets (TPS) Program on Stockton Street, south of the tunnel, was implemented in 2004. Improvements on Columbus Avenue and Market Street as identified for TPS treatments in the Muni Short Range Transit Plan 2006-2025 (see page 3-9) are being incorporated into the SFMTA Transit Effectiveness Program. The Transit

Effectiveness Program Draft Proposals are under public review and will be presented to the SFMTA in summer 2008. Improvements proposed on Columbus Avenue include a Downtown Circulator Route (modified 19-Polk) and all articulated buses operating on the 30-Stockton. Increased service on the F-Market/Wharves is proposed for midday and p.m. peak hours.

AA-14

See Response to Comment AA-1 for discussion about project boundaries. Under the Central Subway Project Alternative 3B, pedestrian trips to the corner of Stockton and Washington Streets would increase as noted in Table 3-17, page 3-67. This would result in a degradation of Level of Service (LOS) from A to B. While LOS B, represents more crowded conditions than LOS A, it is still considered to be an acceptable level of service for city sidewalks. Level of Service E and F represent the most crowded conditions when pedestrian movement becomes difficult due to crowded conditions. The Central Subway would serve the transit dependent area within walking distance north of Washington Street along Stockton Street. The station is located in an area just to the south of the most congested commercial section of Stockton Street. This allows access to the important local shopping district north of Jackson Street without compounding the already crowded conditions. In addition, the 9X-San Bruno express lines, 20-Columbus, 30-Stockton, 39-Coit, 41-Union, and 45-Union/Stockton bus lines will continue to serve the Telegraph Hill and North Beach neighborhoods.

AA-15

See Response to Comment AA-8.

AA-16

The individual bus stops along the Central Subway corridor were not shown under the existing transit conditions as the ridership analysis is not done at that level of detail. In general, however, the bus stops along Stockton Street are located approximately every two blocks. The ridership on all of the surface bus lines along the Central Subway Corridor would decline with the implementation of the rail project as noted in Table 3-8, page 3-37. With the declining ridership, a decline in passenger activity would be expected at the surface bus stops, particularly on the 30-Stockton and 45-Union/Stockton lines, when compared to Alternative 1, No Project/TSM. Based on the expected reduction in passenger demand at the surface bus stations, a detailed impact analysis of each surface bus stop was not required.

AA-17

Pedestrian counts were taken in April and June 2007 during the P.M. peak period.

AA-18

The Central Subway Project, which is an underground rail operation, would not be expected to have an adverse impact on surface street operations along Stockton Street between Washington Street and Columbus Avenue. A level of service analysis was conducted only for the segment of the rail line where surface operations are proposed.

AA-19

See Response to Comment AA-18 regarding traffic level of service analysis for the subway corridor. Level of service analysis was not performed for the construction period along Stockton Street or Columbus Avenue because changes in traffic circulation and traffic delays that are likely to be experienced during the construction period are highly episodic in nature and are continually changing as the construction advances and therefore do not lend themselves to a standard level of service analysis. The construction traffic impacts associated with the build alternatives are described in Section 6.3.2 of the SEIS/SEIR.

AA-20

Text amendments are made in Chapter 3.0, Transportation Analysis and Chapter 6.0, Construction Methods, Impacts, and Mitigations to elaborate on the existing freight loading conditions along Stockton Street and Columbus Avenue.

The following addition of text pertaining to freight loading on Stockton Street in Union Square and Chinatown is added as new third and fourth paragraphs following the second paragraph, page 3-24.

“Stockton Street is a mix of on-street metered parking, on-street loading zones, and bus zones. In some blocks, between Market and Sutter Street, on-street parking and loading has been removed completely to accommodate the flow of traffic, access to the public parking garages, and bus stops. The on-street loading spaces in both Union Square and Chinatown are important to servicing the adjacent retailers as off-street loading docks are limited.

On Columbus Avenue, between Union and Powell Streets, there are no off-street loading spaces.”

The following text is added as a new fifth paragraph following the fourth paragraph, page 6-39:

“Construction of the Union Square/Market Street Station would impact loading and freight activities on Stockton Street between Sutter and Geary Streets. Loading and freight would also be affected on Geary Street between Market/Kearny and Stockton Streets due to the guideway tunnel construction. Curb parking would be eliminated along these streets during various stages of construction to accommodate traffic flow around the work area and trucks for equipment and materials delivery and spoils removal.

Freight and loading activities near the Chinatown Station would be impacted, although the direct impacts would only be limited to the east side of Stockton Street between Clay and Sacramento Streets. The demolition of the existing structures and construction of the new station head house at this location would require curb space on the east side of Stockton Street to accommodate trucks for equipment and materials delivery and spoils removal.”

The following text is added as new paragraphs following the second paragraph, page 6-40:

“Construction of the Union Square/Market Street Station would impact loading and freight activities on Stockton Street between Post and Market Streets and a portion of Ellis Street between Stockton and Powell Streets. Curb parking would be eliminated along these streets during various stages of construction to accommodate traffic flow around the work area and trucks for equipment and materials delivery and spoils removal.

Freight and loading activities near the Chinatown Station would be impacted, although the direct impacts would only be confined to the east side of Stockton Street between Clay and Sacramento Streets. The demolition of the existing structures and construction of the new station head house at this location would require curb space on the east side of Stockton Street to accommodate trucks for equipment and materials delivery and spoils removal.

If the North Beach Tunnel Construction Variant is adopted, construction of the extraction shaft on Columbus Avenue between Powell and Union Streets would have no effect on loading and freight activities as there are no loading zones on this block. However, access to loading and freight zones on Union Street between Stockton and Powell Streets and on Columbus Avenue between Union and Stockton Streets may be impacted due to

restrictions in traffic circulation and detours in the area for the duration of the shaft construction.”

The text of the first sentence, fifth paragraph (Mitigation Measures), page 6-40 is amended as follows:

“Mitigation measures would be the same as those described above under Alternative 23A, except as noted below Union Street and Columbus Avenue would also be directly impacted by construction and would require converting a portion of curb parking upstream or downstream from construction site to loading and unloading zones for temporary access to businesses. DPT will work with the property and business owners on Perry and Stillman Streets to develop temporary detour routes for traffic to maintain access to their properties throughout the construction period. ”

The following text is added as new paragraphs following the fifth paragraph, page 6-40:

“Construction of the Union Square/Market Street Station would impact loading and freight activities on Stockton Street between Geary and Ellis Streets and a portion of Ellis Street between Stockton and Powell Streets since the method of construction used would be cut-and-cover. As described in Section 6.2.3, the installation of shoring for the platform section of the station may require Stockton Street to be shut down to traffic completely for a period of six to eight months. In addition, the installation of shoring and decking would also require at least two traffic lanes on Stockton Street to be closed for about 10 to 12 months. During these stretches of construction activity, there would be no access to the loading and freight zones on Stockton Street. Ellis Street would experience similar impacts to loading and freight as it would be reduced to one traffic lane to accommodate the construction staging area.

Freight and loading activities near the Chinatown Station would be temporarily impacted, although the direct impacts would only be confined to the southwest corner of Stockton and Washington Streets. The demolition of the existing structures and construction of the new station head house at this corner would require curb space on the west side of Stockton Street and the south side of Washington Street to accommodate trucks.

If the North Beach Tunnel Construction Variant is adopted, construction of the extraction shaft on Columbus Avenue between Powell and Union Streets would have no effect on loading and freight activities as there are no loading zones on this block. However, access to loading and freight zones on Union Street between Stockton and Powell Streets

and on Columbus Avenue between Union and Stockton Streets may be impacted due to restrictions in traffic circulation and detours in the area for the duration of the shaft construction.”

AA-21

Lane closures for six months in the middle two lanes of Columbus Avenue between Union Street and Filbert Street would not affect any loading areas for businesses. This block of Columbus Avenue is currently used as bus stops for the 15-Third, 45-Union and 30-Stockton and does not include on-street parking or loading. Construction of the TBM retrieval shaft near Washington Square Park for the tunnel variant would require the temporary (five months) relocation of bus stops for the 30-Stockton and 45-Union lines. Once the shaft is constructed it would be covered and travel lanes would reopen.

AA-22

Parking conditions were presented for the blocks in which the project had the potential for impacting parking conditions. The loss of parking for each alternative is described in Chapter 2.0. The permanent parking loss associated with the project is summarized on Table 3-16, page 3-60 and described on pages 3-58 to 3-64. The construction-related parking impacts are described in Section 6.3.4, pages 6-41 through 6-44 of the SEIS/SEIR. Text additions are recommended as part of the staff initiated text changes (see Chapter 5.0, Volume II), to add additional parking information for the block of Stockton Street, between Washington and Jackson Streets, in Chinatown. This block would lose two parking spaces under Alternative 3B, to accommodate the provision of emergency stairs as described at the bottom of page 2-45.

AA-23

See Responses AA-1, AA-4, and AA-12. The Study Area, Affected Environment, and project boundary at Stockton and Jackson Street is consistent with the study area in the Third Street Light Rail Project Final EIS/EIR, which includes the Phase 2, Central Subway. Population and employment in the broader service area for the subway project has been considered in the analysis on pages 4-25 to 4-27 of the SEIS/SEIR.

AA-24

See Response to Comment I-3. The CAG has recommended the addition of a representative from the North Beach area and SFMTA is in the process of soliciting that representation.

AA-25

See Response to Comment AA-1 for history of the project and the 1995 *Four Corridor Plan*. Page 4-13 clearly points out that the Bayshore Corridor (Third Street) had the highest priority for implementation and use of Proposition B revenues. The Van Ness and Geary corridors were to follow the Third Street LRT project for funding and implementation. The North Beach corridor would follow the Van Ness Avenue and Geary Street corridor in terms of priority, according to the *Four Corridor Plan*. The Central Subway is the second phase of the Third Street Light Rail Project, and is therefore consistent with the funding priorities.

AA-26

See Response to comment I-5. The purpose and need of the Central Subway Project is not specifically relevant to the Port's *Waterfront Land Use Plan* goal of reuniting the city with the waterfront. Reference to the *Waterfront Land Use Plan* was included because it covers The Embarcadero Corridor (Alternative 1, No Project/TSM) and extends to Third and King Streets, which is relevant to the general study area. The fact that the Central Subway Project does not actively promote access to the waterfront does not invalidate it as an important or viable project for the city. The transportation goals of the *Waterfront Land Use Plan* are being achieved through other projects such as the F-line, which was implemented as part of the improvements to The Embarcadero Corridor.

AA-27

See Response to Comments I-5 and AA-26. The *Northeastern Waterfront Plan* boundaries, like those of the *Waterfront Land Use Plan*, cover The Embarcadero Corridor (Alternative 1, No Project/TSM) and extend west to Third and King Streets, which is within the project study area. The purpose and need of the Central Subway Project is not directly related to enhancing access to the city's waterfront; however, this does not invalidate the importance or viability of the project.

AA-28

The extension of the TBM extraction tunnel into North Beach could facilitate a possible future connection to North Beach. As noted in Responses to Comments AA-10 and AA-25, rail service in the North Beach corridor would be subject to an independent study and environmental review as the project has not advanced to the design stage at this time. The 1995 *Four Corridor Plan* calls for improvements in the North Beach Corridor after improvements in the Van Ness Avenue and Geary Street corridors.

AA-29

The Central Subway Project would provide direct transit connections between the AT&T Ballpark, Moscone Convention Center, Union Square, and Chinatown. These destinations are among the most popular tourist attractions in the city. In addition, the project would provide a direct connection to the Powell Street BART/Muni Metro station, which would expand the potential connections to other parts of the city and the region. By enhancing these connections, the project would promote ease of access to popular tourist destinations. See Section 4.1.1, page 4-1 for a description of *General Plan* Elements. It is up to decision-makers to decide if the project is consistent with the *General Plan*.

AA-30

The Central Subway Project does not directly address transit improvements to east-west links. It is focused more on improving the transit connections between the northeastern and southeast parts of the city, particularly between Visitacion Valley and Chinatown and the Bayview/Hunters Point and the South of Market and Downtown employment centers. The Central Subway Project is consistent with Objective 7, Transportation, of the Area Plan for Chinatown and, specifically, Policy 7.2 to make Muni routes reflective of, and responsive to, Chinatown ridership, evidenced by the over crowding of the 45 and 30 buses along Stockton Street.

AA-31

A substantive analysis of potential impacts from both construction and operation of the Central Subway Project is included in the SEIS/SEIR, Section 5.0 Environmental Consequences and Section 6.0 Construction Methods, Impacts, and Mitigation. Both FTA and San Francisco noise limits for construction are described on page 4-124. Dust during construction is discussed on page 6-110 and noise impacts are discussed on page 6-115. Significant impacts and mitigation measures are summarized in the Executive Summary and also in Section 7.0 CEQA Considerations. Standard mitigation measures are typical for an environmental document at this level of project design and engineering. A Mitigation Monitoring and Reporting Program has been included in the Final SEIS/SEIR as Appendix I and includes daily monitoring of air quality, noise, and vibration to make sure that FTA and City thresholds are met. Detailed dust and noise/vibration control measures would be developed during the next phase of design and engineering and would be reflected in construction documents.

AA-32

Pedestrian and vehicle access to businesses will be maintained during construction of the Central Subway Project. Temporary disruption during station excavation to traffic and parking and loading areas in the Downtown (Union Square area along Stockton Street) and in Chinatown along Stockton Street between

Clay and Jackson Streets has been described in the SEIS/SEIR (Section 6.3.2). Measures to minimize transportation impacts are described on pages 6-39 and 6-41. The economic impacts of such disruption on businesses during the construction period have not been specifically quantified as business activity is related to a number of factors including general economic conditions and evolving consumer demand that are not related to the implementation of the Central Subway Project and are difficult to project at an individual business level.

Spoils from tunneling for the subway will be trucked out at the southern portal to the tunnel (along Fourth Street, south of the I-80 Freeway) to minimize impacts to the Downtown, Chinatown and North Beach commercial businesses. SFMTA will provide advance notices to businesses and neighborhoods on the schedule for construction activities, and will be responsive to any complaints regarding business disruption.

AA-33

A detailed construction management plan addressing street closures, transit route changes, truck haul routes, and a public outreach component are generally developed as part of the final design phase of a project and are included in the construction documents. Construction management plans are not developed as part of the environmental impact assessment prior to actual selection of a project. Sections 6.3.1 and 6.3.2 of the SEIS/SEIR do, however, provide a general description of the expected transit and traffic construction-related impacts. Mitigation for expected impacts are described in Section 6.3, Construction Impacts and Mitigation Measures for Transportation.

AA-34

The potential transit detour routes have not yet been identified, however, the intent would be to minimize the out of direction travel from the existing bus corridor if a detour is required, therefore such detours are likely to fall within the study area boundaries. The potential traffic detour routes are identified in Appendix E of the SEIS/SEIR. If traffic is temporarily diverted to other streets, then the traffic level on the detour routes would temporarily increase. As noted on page 6-37 of the Draft SEIS/SEIR, the SFMTA would develop temporary transportation system management measures, such as addition of turn lanes at key intersections, conversion of parking lanes to peak period travel lanes, and traffic control officers, for these detour routes to minimize the adverse impacts.

AA-35

The Columbus Avenue Tunnel Boring Machine (TBM) excavation shaft would not be used for general tunnel and station excavation materials removal. The TBM tunnel excavated materials removal would occur at the south end of the tunnel, under the I-80 Freeway. As stated on page 6-25 of the SEIS/SEIR, the shaft on Columbus Avenue would only be used for removal of soils related to the excavation of the shaft itself, which is anticipated to result in about 5 truck trips a day over a six-month period. Removal of the TBM(s), which is expected to take up to one week, would also occur at this location. The removal would require cranes to lift the TBM and trucks to haul the parts away. There are no plans to stage any construction materials in Washington Square. One lane of traffic would be closed for six months during excavation along Columbus Avenue. Mitigation measures, as outlined on page 6-58 of the SEIS/SEIR, would be put in place to minimize disruption to the park during the construction period.

The following text is added to the end of the second paragraph, page 6-25 and the end of the third paragraph on page 6-32.

“An estimated 3,200 cubic yards of spoils would be removed at the retrieval shaft on Columbus Avenue resulting in an estimated five truck trips per day during the six-month long excavation period. Approximately 20 truck trips would be required to remove the tunnel boring machines.”

AA-36

Several of the SEIS/SEIR sections clearly define the sensitive receptors along the corridor that could be affected by proposed project activities for impacts related to noise and vibration, air quality, and park land. Public and community facilities, including churches, parks, schools and museums are identified in Table 4-7, page 4-37. Each of these is considered a potential sensitive receptor. For example, ambient air quality standards are designed to protect segments of the population most susceptible to the pollutants' adverse effects, or sensitive receptors that include the very young, the elderly, people weak from disease or illness, or persons doing heavy work or exercise. Sensitive receptors for air quality analysis include: Yerba Buena Center, Union Square, Gordon Lau Elementary School playground, Willie “Woo Woo” Wong Playground, and Washington Square Park. (page 4-112 and page 4-120, Air Quality Section 4.11). In addition, residential areas are considered to be sensitive receptors.

For noise, sensitive land uses are grouped into three categories, with associated impact criteria. (page 4-127). Section 4.12.3 on page 4-130 defines the sensitive receptors along the corridor where monitoring was performed to establish a baseline for impact analysis. Measures to minimize or mitigate dust

emissions and noise and vibration impacts are described on pages 6-111 for air quality, and 6-117 for noise.

Information for socioeconomic characteristics is presented in Section 4.2 of the SEIS/SEIR. In terms of Environmental Justice and potential impacts to minority and/or low-income populations refer to Tables 4-1, Population, Race, Hispanic Origin and Age: 2000; Table 4-2, Housing Characteristics: 2000, and Table 4-3, Resident Employment Characteristics by Segment: 2000. These tables compare the characteristics of the Central Subway and the North Beach Construction Variant corridors against the City as a whole. For example, the population along the North Beach Construction Variant corridor is 73 percent Asian, compared to 40 percent for the overall Central Subway Corridor, and 31 percent citywide. The population also tends to be older, 26 percent over the age of 65, compared to 17 percent in the Central Subway Corridor and 14 percent citywide. Ninety-three percent of the 30,910 housing units along the Central Subway corridor are in buildings with more than 5 units, compared with 72 percent along the North Beach Construction Variant Corridor and 44 percent citywide.

Table 4-4 shows the economic characteristics for the Central Subway, with 23 percent of the households below the poverty level, compared with 19 percent along the North Beach Construction Variant, and 11 percent citywide. The same table shows that 72 percent of the households in the Central Subway Corridor did not own an automobile in 2000, compared with 34 percent in the North Beach Construction Variant Corridor, and 29 percent citywide. These statistics define the demographics for the analysis of impacts to populations along the Central Subway Project Corridor for the project alternatives and for the analysis of temporary construction-related impacts for the North Beach Construction Variant associated with removing the Tunnel Boring Machine.

Section 5.2.3 Environmental Justice Findings for the implementation of the Central Subway Project states that the project would provide direct mobility benefits to all of the neighborhoods traversed by the project. These benefits would be equitably shared across communities and various demographic groups. The project is intended to provide a long-term improvement in transit mobility and accessibility in the Study Area, and adverse impacts do not unduly impact any one neighborhood or socioeconomic group, except for residential and business displacement in the predominantly minority and low-income Chinatown, where mitigation through relocation assistance would be required. Section 6.5.3 on page 6-54 describes the Environmental Justice Findings for construction of the project, and states that “construction impacts, including traffic disruption, loss of on-street parking, noise, and dust would occur along the entire alignment, primarily in the areas around the tunnel portals and stations. These temporary impacts would not disproportionately impact low-income populations or neighborhoods.”

AA-37

Measures to avoid adverse effects caused by the presence of hazardous materials during construction are required by Article 20 of the San Francisco Municipal Code, administered by the Department of Public Health. Mitigation measures include: preparation of a Site History Report; collection and analysis of soil samples in accordance with an approved work plan; preparation of a Soils Analysis Report; and preparation of a Site Mitigation Report (page 6-101 of the SEIS/SEIR).

Mitigation measures for construction of the North Beach Construction Variant, including removal of soils and groundwater for the shaft in the middle of Columbus Avenue and the removal of the TBM, are described on page 6-108 of the SEIS/SEIR and would comply with Article 20 to avoid adverse effects caused by the presence of hazardous materials.

AA-38

Based on recent transit tunneling projects, such as the Metro Red line Project in Los Angeles, the removal of the TBM at the extraction shaft in the middle of Columbus Avenue would be less-than-significant because the tunneling machine would be turned off and partially dismantled underground prior to being lifted out of the shaft by a crane to load onto a truck. The process of extraction of the TBM would take a week and would result in less-than-significant impacts due to the limited, temporary duration.

AA-39

An estimated 3,200 cubic yards of spoils would be generated from construction of the TBM retrieval shaft in the middle two lanes of Columbus Avenue. Spoils would be hauled off-site for permanent disposal in an estimated five truck trips per day over the six month excavation period for the construction shaft. Spoils from the tunneling of the construction tunnel would be transported in mine trucks back through the tunnel to the portal south of Market Street near Perry Street for disposal (pages 6-25 and 6-32 of the SEIS/SEIR).

See Response to Comment AA-35 for proposed new text for the SEIS/SEIR regarding the North Beach Construction Variant.

AA-40

Emergency vehicle access during construction is described on page 6-45 and 6-46 (Section 6.3.7 of the SEIS/SEIR). Contractors would be required to submit a site specific emergency access response plan as part of compliance with bid specifications. The plan would include fire department and emergency services access to construction areas, maintainability of emergency services such as fire hydrants, and

demobilization of plant and equipment impacting access to adjacent properties and buildings (see page 6-46 of the SEIS/SEIR).

AA-41

See Responses AA-3 and AA-7 for clarification of de minimis findings for impacts to Section 4(f) resources. On August 10, 2005, Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Pub. L. 109-59 amended existing Section 4(f) legislation in Section 138 of Title 23 and Section 303 of Title 49, US Code. Under the new provisions, once the US DOT determines that a transportation use of Section 4(f) property results in a de minimis impact, analysis of avoidance alternatives are not required and the Section 4(f) evaluation process is complete. The Recreation and Park Commission concurred with the de minimis finding for Union Square and Washington Square Park on February 21, 2008.

AA-42

Mitigation measures for historical archaeological resources are detailed on pages 6-61 to 6-67 of the SEIS/SEIR. As stated on page 6-69, “the TMB Retrieval Pit is moderately sensitive for the presence of historical archaeological park remains (1840s-1873).” The mitigation measures outlined in the SEIS/SEIR will also be part of an updated Programmatic Agreement among the California State Historic Preservation Officer, the Federal Transit Administration, and the Advisory Council on Historic Preservation. The Programmatic Agreement details the requirements for supplemental archival research, field methods and procedures to be followed if archaeological resources are encountered during construction, archaeological monitoring during construction, and the treatment of discovered resources (see Appendix C of the SEIS/SEIR). Pre-testing by a qualified archaeologist at the TMB extraction shaft prior to construction would be part of the Programmatic Agreement, and curation of any artifacts discovered during the pre-testing or monitored excavation activities would be documented in the Final Archaeological Resources Report (FARR), which would be distributed to the Northwest Information Center and to the San Francisco Planning Department.

Small street trees in the median of Columbus Avenue would be removed for construction of the TMB retrieval shaft and would be replaced at a 1:1 ratio. These trees do not meet the Department of Public Works definition of “Significant Trees” protected under Department of Public Works Code Section 8.02-8.11. No trees within Washington Square Park would be removed or impacted. A Certified arborist would be present during construction of the retrieval shaft to monitor protection of tree roots during excavation (see Section 6.12 Biological and Wetland Resources, page 6-99).

AA-43

SFMTA is unaware of any ‘unimproved’ lot at Stockton and Clay Streets in Chinatown. Willie “Woo Woo” Wong Playground, a park under the jurisdiction of the Recreation and Parks Department located to the east of Stockton Street on Clay Street along with park access routes on Hang Ah Alley (dedicated park land) and Pagoda Place, would not be a viable location for a subway station.

AA-44

Returning Stockton Street, the busiest commercial street in Chinatown, to a streetcar-only street is not a feasible option, as parking, loading, emergency access, and Muni bus operations are already dominant uses of the street. See Response to Comment I-1 for discussion of surface operations. See also Project Development History, Section 2.4, page 2-52, for a detailed description of alternatives considered and screened from further analysis in the SEIS/SEIR. The extension of the light rail line to Fisherman’s Wharf is beyond the scope of this project as outlined in Response to Comment AA-1.

Chinatown has been very supportive of the subway project from the beginning of the Third Street Light Rail Project EIS/EIR over ten years ago. The majority of representatives of the Chinatown community spoke in support of the project at the Public Hearing before the Planning Commission on November 15, 2007.

No significant impacts to Washington Square have been identified in the SEIS/SEIR.

AA-45

The affected environment and alternatives analyzed in the SEIS/SEIR are consistent with the certified Final EIS/EIR (1998) for the Third Street Light Rail Project, which includes the Phase 2, Central Subway. Improving mobility and transit deficiencies connecting the southeastern part of the City (Bayview, Visitacion Valley and Mission Bay) with Downtown and Chinatown, and with regional transit systems (BART, Caltrain) has been an objective of the Third Street Light Rail project since the 1993 original Bayshore Transit Study and the 1995 *Four Corridor Plan* were completed. The project goals of improved transit service and reliability for transit-dependant populations along the Third Street Light Rail (T-Line) and the Central Subway Corridor have not changed. This SEIS/SEIR updates the information for the affected environment to meet the 2030 planning horizon. The analysis of impacts is consistent with the needs statement and study area affected by the alternatives for the Central Subway Project.

The alternatives analyzed in this SEIS/SEIR resulted from changes to the subway portion of the light rail project (Phase 2) since 1998. These changes respond to input from the CAG and revisions by SFMTA to incorporate updated design standards, design features responding to new policies, and project cost

savings. The changes include: a closed barrier fare system; updated fire and safety requirements requiring relocation of the vent shafts from within the streets to above ground adjacent buildings; development of a more direct route under Fourth Street facilitated by a deeper crossing under the BART tube; use of off-street/sidewalk access to stations; and use of a tunnel boring machine for construction (with a possible extension of the tunnel for purposes of extracting the TBM at Columbus Avenue). For the SEIS/SEIR the planning horizon year was also extended from 2015 to 2030. The history of the alternatives considered and the changes to the original subway portion of the project is documented in Section 2.4 Project Development History, page 2-52 to 2-62. This section addresses the range of reasonable alternatives and provides rationale for eliminating some alternatives from further analysis.

The alternatives included in the SEIS/SEIR were endorsed by FTA, the federal lead agency with authority for NEPA compliance, and the Planning Department's Major Environmental Analysis (MEA) section has concurred with the range of alternatives for CEQA purposes.

AA-46

The terminus of the Third Street Light Rail Project (which included the Phase 2 Central Subway Project) was established at Jackson Street in Chinatown in the 1998 EIS/EIR. The Notice of Preparation for the Central Subway Project, dated September 20, 2006 defined the "terminus of the subway project in the vicinity of Stockton and Jackson Streets in Chinatown". And public scoping for the SEIS/SEIR defined the terminus for the alternatives as Jackson Street in Chinatown.

The SEIS/SEIR includes relevant affected environment information and impact analysis for the project along Stockton Street, north of Jackson Street, to Columbus Avenue, the area potentially affected by the construction of the North Beach Construction Variant for retrieval of the TBM. Information for the affected environment is included in Section 4.0 Affected Environment for each of the environmental disciplines and impacts and mitigation measures for the North Beach Construction Variant are included in Section 6.0 Construction Methods, Impacts and Mitigation Measures as noted below: socioeconomic impacts related to the easement under a parcel at 1455 Stockton Street (pages 6-53 and 6-54); community facility impacts related to Washington Square Park (page 6-58); archaeological impacts (pages 6-68 to 6-70); historic property impacts (pages 6-77 and 6-81); visual impacts (page 6-84); biological impacts on street trees (page 6-99); and air quality impacts (page 6-113).

AA-47

A Draft Mitigation Monitoring and Reporting Program (MMRP) is included in Appendix I of the Final SEIS/SEIR. The MMRP provides details on how impacts would be monitored and mitigation measures

would be implemented. The MMRP will become part of the Conditions of Approval for the project and it will be the responsibility of SFMTA to provide progress reports to the Planning Department during the construction of the project.

A representative from North Beach is being sought for the CAG. The Telegraph Hill Dwellers is part of the list of community organizations that routinely receives project newsletters and updates on the project and will continue to do so.

Letter AB



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2007

December 10, 2007

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RE: Central Subway Draft Supplemental Environmental Impact Statement/
Supplemental Environmental Impact Report

Dear Mr. Wycko:

This letter provides the comments of the San Francisco Bay Area Rapid Transit District ("BART") on the October 2007 Draft Supplemental Environmental Impact Statement/ Supplemental Environmental Impact Report ("DSEIS/SEIR") for the Central Subway Project ("the Project") proposed by the San Francisco Municipal Transit Authority ("MTA").

BART appreciates the opportunity to provide these comments on the Central Subway DSEIS/SEIR and looks forward to collaborating with MTA to develop a successful Project with substantial benefits for the public and both transit systems. We believe that many of the potential impacts discussed in our comments below may be addressed and avoided or mitigated through close consultation between MTA and BART, if not during the environmental review process, then during the design and construction phase of the Project. Further analysis and discussions between the agencies may well demonstrate that some of the potential impacts raised in these comments would, in fact, be less than significant. Nevertheless, where available information indicates potentially significant impacts, any issues that are not resolved during the environmental review process and remain potentially significant should be acknowledged and appropriately addressed in the Final SEIS/SEIR.

In addition, with this information included in the Final SEIS/SEIR, BART and MTA will be better positioned to enter into informed discussions concerning the extensive coordination and agreements that will allow the Powell Street Station to be utilized as an integral part of the Project. Under Alternative 3, Options A and B, which are respectively designated as the Locally Preferred Alternative ("LPA") and the Modified LPA (DSEIS/SEIR, p. 2-1),¹ MTA proposes to modify the previously approved Central Subway component of the Third Street Light Rail Project by constructing one station, rather than two, to serve the Union Square/Market Street area. (p. 2-26). Passengers accessing the single new station "would connect to the BART/MTA Metro Market Street Subway at the Powell Street Station using existing pedestrian entrances on Market Street and at the northwest corner entrance on Stockton and Ellis Streets." (p. 2-31). Utilizing the existing Powell Street Station portals to provide access for the Project's riders will require close coordination and agreements between MTA and BART on improvements and modifications to BART structures, property and operations, in order to accommodate both construction and operation of the Project. It is critical that the

AB-1

AB-2

¹ Unless otherwise indicated, all page references are to the DSEIS/SEIR.

proposed interconnection between our systems work effectively for both agencies and for the public.

AB-2
Cont.

In this light, we note that BART previously requested to be designated as a “responsible agency” under the California Environmental Quality Act (“CEQA”) and a “cooperating agency” under the National Environmental Policy Act (“NEPA”). In MTA’s August 24, 2007 letter to BART, it suggested that BART should not be designated as a responsible agency because “the action that MTA needs from BART is akin to an encroachment permit such as CalTrans grants when work is performed on their property.” Given the integrated function of the Powell Street Station for both systems, and the need for an agreement for intensified joint use of the station to be approved by the BART Board of Directors, we believe it is inaccurate to consider BART’s role in the Project as limited to a ministerial action, equivalent to issuing an encroachment permit.

AB-3

Comment 1 – Project Description. The DSEIS/SEIR does not acknowledge that the Project will necessitate physical changes to the existing environment at the Powell Street Station, resulting in potentially significant environmental impacts. As noted above, the current design for Alternative 3 relies upon the existing portals at the Powell Street Station to provide primary surface-to-subway pedestrian access to the new Union Square/Market Street Station. (p. 2-31). The Estimated Weekday Ridership projections in the DSEIS/SEIR predict that between 32,000 and 38,000 passengers will use the Central Subway Union Square/Market Street Station by 2030. (p. 3-38 (Table 3-9)).² The proposed addition of these additional passengers requires physical modifications to the existing Powell Street Station in order to increase its capacity, with reasonably foreseeable environmental consequences both during construction and long term. If these modifications are not incorporated in the Project Description, they will not be “cleared” in the DSEIS/SEIR process and would have to be addressed in a supplemental environmental document.

AB-4

MTA’s project team appears to recognize this issue, although it is not addressed in the DSEIS/SEIR. For example, in a November 29, 2007 meeting at the Central Subway Project Office, MTA staff noted that the elevator closest to the Project (near the Apple Store entrance) would likely have to be replaced to accommodate the additional patrons, as well as to address potential Americans with Disabilities Act (“ADA”) compliance issues. Similarly, at a December 5, 2007 meeting at the Central Subway Project Office, MTA staff presented a design concept for widening the Apple Store entrance as a way to solve capacity problems, as the existing entrance stairs might not be adequate for Project needs. At the December 5 meeting, the project team also indicated that MTA would likely need access to the existing street-to-concourse elevator closest to the Apple Store entrance, and that this elevator might have to be moved for ADA purposes because, in the event the BART Station is closed but the Central Subway is open, passengers would need to access the Central Subway Station from the south end. The project team also noted it may be necessary to close the Apple Store entrance for an extended period of time to help facilitate the construction of the Central Subway Station box.

² As a comparison, on an average weekday in October 2007 there were about 54,000 trips (entries and exits) on BART at Powell Street Station.

BART supports MTA's efforts to identify and resolve station capacity issues. However, the proposed solutions could change the "environmental footprint" of the Project – in particular, the potential transportation impacts of protracted closure of the Apple Store entrance during construction. Their absence from the DSEIS/SEIR leaves the Project Description and, accordingly, the impact analysis and proposed mitigation measures, incomplete. Nor are these concerns regarding station capacity and infrastructure limited to the effects at the Apple Store entrance as proposed by MTA staff. The DSEIS/SEIR contains no analysis concerning the current capacity of the existing Powell Street Station portals, passageways and concourses, or whether the Powell Street Station can accommodate the proposed additional capacity without physical modifications. Without this information, it is unclear what physical modifications to the Station will be required, which could result in potentially significant environmental impacts and requiring mitigation. Nevertheless, solutions to the capacity issues must be found for the Project to proceed and it is reasonably foreseeable those solutions would result in an expanded "environmental footprint" compared to that of the current Project Description, including but not limited to the redesign of the entrances; additional escalators and stairwells; improved elevator access; additional and/or relocated ticket machines and fare gates; redesign of the general layout of the concourse area to properly accommodate the increased and altered passenger flow; ADA compliance requirements; and improvements to the station ventilation system.³

AB-4
Cont.

If analysis of these issues is deferred until after the Final SEIS/SEIR is completed, and that analysis results in physical modifications to the Powell Street Station that are not incorporated in the Project Description, then a supplemental environmental document would be needed to evaluate any impacts associated with those modifications.

AB-5

Comment 2 – Impacts on Transit. The DSEIS/SEIR analysis of public transit impacts does not include analysis of the Project's potential impacts on BART service. Section 3.1.1 describes the "affected environment" as including existing public transit and recognizes the interconnectivity between MTA and BART. (p. 3-13). However, in Section 3.2.1, the DSEIS/SEIR analyzes only the Project's impacts to existing MTA services and does not mention BART. This omission is of concern to BART. Based on the projected ridership numbers BART has been provided, the Project will result in an estimated 17,000 additional daily transfers to BART from MTA by 2030 at Powell Street Station. The potential impact of this additional ridership on BART service must be analyzed.

AB-6

It appears that the omission of BART from the transit impact analysis contravenes the City's own CEQA Significance Criteria. For the Impact Category "Transit Service and Accessibility":

The project would have effect on the environment if it would cause substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such

³ We note that there is precedent including potential impacts on existing station capacity and crowding in environmental review of transit projects. For example, in the 2004 Final EIS for New York's Second Avenue Subway Project, Chapter 5B, pp. 5B-13 – 5B-18, impacts of the project on station crowding were extensively reviewed, including analysis of entrances and exits and necessary improvements (including ADA improvements) that would result. See <http://www.mta.info/capconstr/sas/feis.htm>.

that significant adverse impacts in transit service levels could result. (p. 7-4 (Table 7-1)).

For the Impact Category "Pedestrians":

The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. (*Id.*)

Based on the information currently available, it appears that the Project could meet or exceed these significance criteria. In the absence of analysis demonstrating otherwise, it appears likely that the proposed 17,000-plus increase in riders in and around the Powell Street Station cannot be accommodated by the existing station capacity without significant station improvements, and may well result in a substantial increase in operating costs, as well as creating potentially hazardous conditions for pedestrians resulting from overcrowding and/or insufficient provision for emergencies. Accommodating 17,000 additional transfers from MTA to BART at the Powell Street station could also have a significant adverse impact on transit service levels. Under the City's own guidelines, these analyses and significance determinations, and if necessary mitigation measures, are required for transit impacts in general – not just for those on MTA.

Comment 3 – Construction-Period Impacts on Transit Service. Service interruption during construction, as well as in the long term, is a potentially significant impact that must be analyzed. As noted above, the Project could require protracted closure of at least one Powell Street Station entrance and rerouting of passenger access during construction. DSEIS/SEIR does not analyze any impacts, including potential entrance closures, resulting from necessary modifications to the Powell Street Station. (§§ 6.3.1, 6.3.5). Moreover, the Project requires MTA to bore new tunnels on BART property beneath BART's active Market Street trackway. However, the DSEIS/SEIR does not analyze whether the proposed tunneling would require BART to interrupt service, or require the Powell Street Station to be closed for a period of time, or (if conducted late at night) would disrupt BART maintenance activities. In a letter dated October 3, 2007, Central Subway Program Manager John Funghi stated that MTA "will mitigate construction-related impacts to BART riders. During design, [MTA] will work with BART to develop public outreach and other programs to mitigate the impact to riders." We appreciate this proposal and request that it be included in the discussion of mitigation measures for construction-related transit impacts, which currently provides mitigation only for impacts on MTA service. (§ 6.3.1, pp. 6-34 – 6-35).

Comment 4 – Impacts on Safety. As indicated in Appendix G, Section VII(g) of the CEQA Guidelines (14 Cal. Code Regs. § 15000 *et seq.*), a potentially significant impact may occur if a project would "impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan." BART and MTA have an adopted Emergency Plan for the Powell Street Station, last updated in June 2006, but the DSEIS/SEIR does not take this agreement into account. The addition and connection of the Central Subway station box to the existing Powell Street Station could impede evacuation and likely increase the overall evacuation time from the Powell Street Station in event of emergency. Since this issue has not

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AB-7

AB-8

yet been analyzed, it is not clear how evacuated passengers from the Central Subway Station area will be accommodated within the existing Powell Street Station complex in the event of an emergency. The impact on safety from increasing the number of passengers within the station complex, particularly during peak periods, must be analyzed in order to determine whether any significant impacts will result from the Project and whether mitigation measures such as improvements to the Powell Street Station's vertical circulation, platform widths, lighting, ventilation systems, fire suppression systems and wayfinding might be necessary to ensure safety during emergency situations.⁴

AB-8
Cont.

Comment 5 – Impacts on Services. While the DSEIS/SEIR analyzes the Project's potential impacts on Police, Fire and Emergency Services (§ 5.3.3), it again focuses solely on impacts to MTA facilities and does not consider the Project's impacts on the BART station or joint use areas of the Powell Street Station. In particular, the DSEIS/SEIR (p. 5-15) states that "Muni provides its own security officers, who would respond to safety incidents in the transit system." However, BART's own security officers are responsible for responding to incidents in the BART system. To the extent that the Project results in increased passenger traffic as discussed above, beyond areas patrolled by MTA security, the impact is not limited as the DSEIS/SEIR implies.

AB-9

Comment 6 – Hydrology Impacts. As the DSEIS/SEIR recognizes, existing inflow of groundwater at the Powell Street Station is a significant environmental problem, and treatment of this issue will require special design considerations. (§ 6.11.2, p. 6-96). BART currently pumps hundreds of thousands of gallons of water out of the Powell Street Station on a daily basis. If the Project interferes with this water flow, flooding could result. In addition, water accumulating beneath BART's station box could cause scouring and sagging of the BART box. New piping or drainage facilities may be required to address this issue. The installation of such facilities is not included in the Project Description and may itself cause impacts (see comment 2 above). Mr. Funghi's October 3, 2007 letter states that MTA will design the Central Subway station "to not increase the height of the existing Powell Street Station groundwater table" and "will develop measures, such as horizontal wells, to allow lateral groundwater flow" past the station. Again, we appreciate this proposal and request that it be included in the DSEIS/SEIR to avoid or mitigate the hydrology impact.

AB-10

Comment 7 – Hazardous Materials Impacts. The DSEIS/SEIR (pp. 4-105 – 4-110) surveys environmental contamination in soil and groundwater, but does not make mention of hazardous materials present in the Powell Street Station structures. The construction impact analysis focuses mainly on potential exposure of site workers to contamination in soils and groundwater (§ 6.13) and only briefly acknowledges the possibility of encountering "unanticipated subsurface structures containing hazardous materials such as underground pipelines" (*id.*, p. 6-100). The Powell Street Station was part of the original BART construction. Given the age of the facility, to the extent the Project requires modification to the existing station walls and structures (including construction of the connection to the new Project station), it can be anticipated that construction workers will encounter, and need to be appropriately protected

AB-11

⁴ Again, the Second Avenue Subway FEIS, pp. 5B-32 – 5B-38, provides an example of appropriate analysis of such issues in an EIS, which are disregarded in the DSEIS/SEIR for the Central Subway Project.

from, hazardous materials. In particular, it is likely that an asbestos abatement program would need to be implemented. In addition, the significant increase in the number of patrons using the Powell Street Station will increase the ambient station temperature, potentially to a degree that would require BART to activate its mechanically driven, station-cooling, ventilation system, since the Project does not include an additional ventilation system to address the temperature increase. The BART ventilation system was also part of the original BART construction and, again, asbestos abatement may be required.

AB-11
Cont.

Thank you for considering BART's comments. Please feel free to contact Marianne Payne at 510-464-6140 if you require further information or have any question or concerns.

Sincerely,



Dorothy Digger
General Manager

Cc:

BART Executive Managers
Nathaniel P. Ford, Sr., SFMTA, General Manager
Leslie Rogers, FTA, Regional Administrator
Steve Heminger, MTC, Executive Director
Jose Luis Moscovich, SFCTA, Executive Director
Marianne Payne, BART, Department Manager of Planning
John Funghi, SFMTA, Project Manager



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688
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2008

May 1, 2008

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Tom Radulovich
9TH DISTRICT

Mr. William Neilson, PE
Principal Engineer
Central Subway Project Office
821 Howard Street, 2nd Floor
San Francisco, CA 94103

Re: Central Subway Draft Supplemental Environmental Impact
Statement/Supplemental Environmental Impact Report

Dear Mr. Neilson:

On December 10, 2007, BART provided written comments to San Francisco Municipal Transit Authority ("MTA") concerning the Central Subway Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report ("DSEIS/SEIR"). In its comment letter, BART noted that, based on the available information in the DSEIS/SEIR, several potentially significant impacts could result from the project, in particular related to impacts on transit (both operational and construction related), public safety, public services (police, fire and emergency), hydrology and hazardous materials. Since submitting its comment letter, BART has undertaken a capacity study for the Powell Street Station and a study of construction impacts of the MTA Central Subway structures on existing BART facilities in order to gather additional information regarding BART's stated concerns and the identified potentially significant environmental impacts. As part of BART's ongoing effort to cooperate with MTA in order to resolve these issues, BART submits this letter sharing and discussing some of the initial findings from the construction impact study based on the Draft Market Street Crossing Modeling Work Plan, dated March 13, 2008, and various PowerPoint presentations given to BART staff by MTA between March 2007 and March 2008.

- 1 In general the assessment methodology and analyses methods used by MTA are in-line with accepted industry practice. A ground loss of 0.5% should be achievable with an EPB TBM, and we note that MTA has also undertaken a sensitivity analysis up to 1%.
- 2 The method used to assess settlements was initially developed specifically for calculating settlements at the ground surface. An extension of that theory has been developed that allows the trough width factors, etc. to be adjusted to take into account the assessment of settlement for an underground structure



- such as BART's tunnels. However, where the object causing settlement (MTA's tunnels) is very close to the structure being assessed (BART's tunnels), the equations used in the empirical calculations tend to lose some accuracy. As there is only 5 feet between the MTA and BART tunnels, has MTA considered this effect at all in its assessment methodology?
- 3 Whilst the previous experience of building the MTA tunnels above the BART tunnels (MTA Metro Turnback) is useful, we note that in that instance the MTA tunnels were above the BART facilities. We would expect this current situation with the MTA tunnels being below the BART tunnels to have potentially greater impact and ground movements.
 - 4 MTA's report outlining the assessment of impact on the BART tunnels, dated February 4, 2005, seems to be based on a vertical separation of 10 feet. The more recent presentation to BART indicated that it could be as low as 5 feet. Will MTA please clarify?
 - 5 MTA proposes grouting as a means of mitigating settlements. Given that there is only a 5-foot clearance between MTA and BART tunnels, how will MTA ensure that the grouting process itself does not impact the BART tunnels?
 - 6 Will MTA provide relevant extracts (i.e. at the location in question) from its geotech report so that we can make our own assessment of the validity of trough width factors and other parameters used in the MTA assessment? Without geotechnical information it is very difficult for BART to provide informed comment.
 - 7 Will MTA provide details of the proposed depth/excavation dimensions, and construction method for the new station/station entrance close to Powell Street Station? Without this it is difficult to comment on the impact of the construction on the BART facility.
 - 8 Figure 4.1 of the MTA report indicates future analyses that they propose to undertake. What future analyses does MTA propose for the BART tunnels, and when will that be undertaken?
 - 9 MTA's settlement assessment looked at the impact of various combinations for MTA tunnel spacing, and vertical separation between the MTA and BART tunnels. How much latitude will MTA's alignment criteria actually give MTA to move the alignment, i.e. is this sensitivity analysis just a "theoretical" exercise, or is there actually a possibility that the MTA alignment could be lowered a little, or the tunnels separated further, in order to reduce settlements? Also, will MTA confirm the current spacing of its tunnels and vertical separation to BART tunnels based on its most up-to-date alignment?
 - 10 Actual field measurements and not as-builts must be used for Monitoring Program of BART tunnels at the MTA crossing.
 - 11 A high-resolution "point cloud" cross-sectional clearance measurements will need to be made, well in advance of any construction, to determine existing clearance conditions and

again after the completion of construction. This can be used to determine what tunnel correctional variances are acceptable. Extentionometer measurements can then be used to monitor during construction. This survey should extend at-least 200' on each side of the areas being crossed.

- 12 An actual site survey of top of rail and alignment, on both rails of both tracks, at 15.5' intervals will need to be performed. Two base line measurements, taken at least one week apart should be done ahead of construction. Monitoring at least weekly beginning when tunnel excavation activities are within 100' of the BART tunnel, if movement exceeding 1/4" is detected then the inspections shall be daily, until the movement within a 1-week period is less than 1/4". This survey should extend at-least 200' on each side of the areas being crossed. If the 62' chord mid-ordinate deflection for alignment or surface exceeds 1/2" then construction activities shall be halted until such time as a mitigation plan can be developed. The cord mid-ordinate can be determined for the survey data. For example if the 15.5' stations are identified as:

- A - 0'
- B - 15.5'
- C - 31'
- D - 46.5'
- E - 62'

The 62' Mid Ordinate can be determined by the following: The 62;' Chord Mid Ordinate at $C = ((A+B)/2)-C$.

- The survey system can be local, a tie in to bench marks is not required.
 - The results of these surveys should be made available to BART within 24 hours of the measurements being taken. Construction should be halted if the surveys are not performed.
- 13 A thorough photo or video survey should be performed by an independent, mutually agreed upon consultant to document current BART tunnel conditions. This can be later referred to in case of possible damage or water leaks. The survey report should detail all water leakage and other conditions, keyed to BART's Engineering Station System. Note: BART's engineering stations are painted on the rails at 100' intervals. Two surveys should be performed, one before and one after construction. BART will combine this survey information, with the inspections performed by our Structural Inspectors to have a good record of pre-existing Conditions.
 - 14 MTA should have a water leak mitigation plan in place, for water leaks in BART's tunnels, prior to performing any work. This would include approved work plans for correcting water leaks and methods, including how they intend to access BART's tracks (i.e., all insurance and indemnifications should be in-place in advance). BART will have a plan in place for supervision of the repairs, if they are required.

Mr. William Neilson, PE
Re: Central Subway Draft SEIS/SEIR
May 1, 2008
Page 4

- 15 All surveys should to be performed by an independent PLS, in the employ of MTA (not the contractor performing the construction). The initial baseline surveys should not be performed too far in advance of construction, so as to avoid possible unrelated changes.

BART looks forward to continuing to collaborate with MTA to develop a successful project with substantial benefits for the public and both transit systems. To this end, and based on the above discussion and the information available to date, BART continues to be concerned that the Central Subway project will have a potentially significant impact on transit, public safety and services, hydrology, and hazardous materials, and that such impact should be acknowledged and appropriately analyzed in the Final SEIS/SEIR so that the possible impacts are "cleared" and not subject to supplemental environmental review.

Please feel free to contact me at 510-464-6140 if you require further information or have any questions or concerns.

Sincerely,

Marianne A. Payne
BART Department Manager of Planning

CS Letter No. 0041 (0148)

May 19, 2008

San Francisco Bay Area Rapid Transit District
300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688

Attn: Marianne A. Payne, BART Department Manager of Planning

Subject: T-Third Phase 2, BART Powell Station Capacity Study

Dear: Ms. Payne,

We apologize for the two day delay in returning comments on draft 2 of the Powell Station Capacity Study transmitted in Thomas Tumola's May 8, 2008 email. However, this delay was caused by a discrepancy in the assumptions within the draft report and the ridership projections that SFMTA provided to BART in November 2007. We have resolved the discrepancy with the information provided below. Please let us know when this information can be incorporated into your report.

Section 2.1.1 Data Sources

Table 2: 2008 Total Daily Passenger Volumes

Table 2 shows the same exact number of riders transferring from Metro to BART as transferring from BART to Metro. The SFCTA model provides different numbers for transfers from Metro to BART and BART to Metro. Please correct.

Section 2.1.2 Assumptions

The PM Peak hour for Exits from the T-Third is expected to be 5:30PM to 6:30PM due to high reverse commute ridership from Caltrain. For the T-Third, the PM Peak hour percentage for exits of the 3-hour PM peak period should be the average of BART PM Peak hour percentage of the 3-hour PM peak period and the percentage per hour for the remaining PM peak period to account for the difference between BART (5:00PM-6:00PM) and T-Third (5:30PM-6:30PM) PM Peak hour for exits.

Table 3a: T-Third Peak Hour Percentage of 3-Hour Peak Period

AM Peak Hour % of Peak Period		PM Peak Hour % of Peak Period	
Entries	Exits	Entries	Exits
43%	50%	39%	35%

Section 2.1.3 Resulting Peak Hour Passenger Volumes

We don't believe the information in this section is necessary to the analysis and question the information given our concern with Table 2.

Section 3.1.1 Data Sources

Table 6: Data Sources for 2030 without T-Third

Common data should be used for both BART and SFMTA, i.e. 11/2007 SFCTA data provided to BART in November 2007.

Section 3.1.1 states that the BART estimates projected for the SFCTA CHAMP model should be factored upwards by 10% to account for SVRT. BART's 2004 Capacity Analysis for Powell Street Station projected that BART ridership would increase 2.3% as a result of SVRT with 30 trains per hour in each direction at Embarcadero in 2025. Please provide the supporting documentation that would verify the current 10% projection.

Table 7: Powell Station 2030 without T-Third

Table 7 shows the same exact number of riders transferring from Metro to BART as transferring from BART to Metro. The SFCTA model provides different numbers for transfers from Metro to BART and BART to Metro. Tables 7 & 8 are revised below based on the 11/2007 SFCTA data.

		To			Total
		BART	Metro	Surface	
From	BART			41,990	41,990
	Metro	1,878		23,215	25,093
	Surface	33,702	20,139		53,841
	Total	35,580	20,139	65,205	

Table 8: Powell Station 2030 Peak Hour Passengers without T-Third
AM Peak Hour

		To			Total
		BART	Metro	Surface	
From	BART		0	11,937	11,937
	Metro	75		3,929	4,004
	Surface	674	1,045		1,719
	Total	749	1,045	15,866	

PM Peak Hour

		To			Total
		BART	Metro	Surface	
From	BART		0	1,746	1,746
	Metro	256		1,826	2,081
	Surface	6,414	2,710		9,124
	Total	6,670	2,710	3,571	

3.2.3 Resulting Passenger Distribution

Table 9: Pedestrian Distribution without T-Third
Revise per Table 8.

4.1.1 Data Sources

Table 11: 2030 Powell and UMS Stations

Table 11 shows the same exact number of riders transferring from Metro to BART as transferring from BART to Metro. The SFCTA model provides different numbers for transfers from Metro to BART and BART to Metro. Additionally, Table 11 shows exactly the same

number of BART riders walking into and out of the station as the "No Project" condition shown in Table 7. The project will change the number of BART riders walking into and out of the station as shown below in Table 11 revised based on the results of SFCTA's 11/2007 modeling.

		To				Total
		BART	Metro	T-Third	Surface	
From	BART			14,584	31,637	46,221
	Metro	73		8,229	17,287	25,589
	T-Third	15,315	8,488		8,296	32,099
	Surface	33,226	15,231	5,692		54,149
	Total	48,614	23,719	28,505	57,220	

4.1.2 Assumptions

It is just as likely by 2030 that Caltrain will be extended to TransBay Terminal as it is that SVRT will be operation. The largest source of T-Third users of the UMS station is Caltrain (67% of the 17,400 at 4th & King). If either the Caltrain extension or SVRT is placed in operation, T-Third ridership will be reduced. Because both SVRT and Caltrain Extension will reduce T-Third ridership, our approach at this time is to use SFCTA's (11/07) 2030 projections for BART and the T-Third without SVRT and Caltrain Extension to identify potential impacts if both SVRT and Caltrain Extension do not occur prior to 2030.

Traffic analysis zones (TAZ) south of Mission Street were incorrectly included in the analysis. Traffic analysis zones south of Mission Street are closer to the Moscone station (between Folsom & Howard) than they are to the UMS station (deep station centered on O'Farrell) and are part of the contributory area for the Moscone station. The analysis, Figure 6, and subsequent calculations should be revised accordingly.

4.1.3 Resulting Peak Hour Passenger Volumes

Table 12: 2030 Peak Hour Passenger Volumes, with T-Third

The below forecasts of 2030 Peak Hour Passenger Volumes uses Table 11 as revised above. Please allocate the forecasted T-Third passenger flows between the ends of the UMS station based on the revised TAZ analysis discussed in 4.1.2 above.

AM Peak

		To				Total
		BART	Metro	T-Third	Surface	
From	BART		0	4,613	8,809	13,422
	Metro	2		1,076	2,992	4,071
	T-Third	941	1,540		1,914	4,395
	Surface	683	790	538		2,012
	Total	1,626	2,330	6,228	13,715	

PM Peak

		To				Total
		BART	Metro	T-Third	Surface	
From	BART		0	828	1,269	2,097
	Metro	11		982	1,255	2,248
	T-Third	3,970	833		816	5,619
	Surface	6,390	1,980	847		9,218
	Total	10,371	2,813	2,658	3,340	

4.2.3 Resulting Passenger Distribution

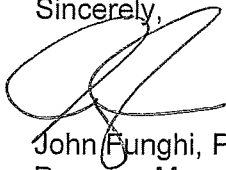
Table 13: Pedestrian Volumes in AM and PM Peak for 2030 with T-Third
Revise based on the requested revision to Table 12.

5.1 Passenger Volumes

Table 14: Comparison of No-project and With-project Volumes in the PM Peak Hour
Revise to reflect the requested revisions to Tables 9 & 13.

As a result of the work that ARUP has done, it is clear that potential impacts to Powell Street Station will depend upon if either SVRT or Caltrain Extension is implemented. Since SVRT and Caltrain Extension will reduce T-Third ridership, the SFCTA data provided in November 2007 is a conservative estimate of the ridership impact for the T-Third Phase 2 project. Therefore, BART/SFMTA will continue to monitor SVRT, Caltrain Extension, and T-Third ridership to determine actual impacts and responsibility for mitigation.

Sincerely,



John Funghi, P.E.
Program Manager

- cc: File No. 2.30.02
William Neilson
Thomas Tumola, BART
William Baumgardner, ARUP

CS Letter No. 0179

May 30, 2008

San Francisco Bay Area Rapid Transit District
300 Lakeside Drive, P.O. Box 12688
Oakland, CA 94604-2688

Attn: Marianne A. Payne, BART Department Manager of Planning

Dear Ms. Payne,

Subject: T-Third Phase 2, May 5, 2008 BART Tunnel Crossing Comments

Thank you for your email of May 5, 2008, transmitting BART comments (dated May 1, 2008) on SFMTA's April 7, 2008 presentation and other information provided to BART on the T-Third Phase 2 project's crossing under the Market Street tunnels. This is SFMTA's fourth response to BART's SEIS/SEIR concerns. BART's concerns are addressed in the SEIS/SEIR along with proposed mitigations. We will continue to address BART's concerns in accordance with the current revision of the BART/SFMTA Coordination Plan for the T-Third project. If new significant impacts are identified, we will address them as required. Below is a point-by-point response to the May 5, 2008 comments.

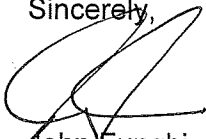
1. SFMTA concurs that a ground loss of 0.5% is achievable with a properly operated Earth Pressure Balance Tunnel Boring Machine (TBM). SFMTA is analyzing the sensitivity of the BART tunnels to variations in ground loss.
2. Empirical calculations were performed to obtain a preliminary order of magnitude estimate of the potential free-field settlements with the understanding that a sophisticated analysis would be required to properly evaluate the soil-structure interaction between the four existing tunnels and the new T-Third tunnels. SFMTA is performing rigorous soil-structure Fast Lagrangian Analysis of Continua in 3 Dimensions using FLAC3D version 3.10 to verify the stability and safety of the BART tunnels during and following T-Third tunneling and expects to complete the analysis and provide the result to BART within two months.
3. SFMTA concurs that the Muni Metro Turnback (MMT) tunnels serves as a useful starting point for the T-Third analyses. As discussed previously, SFMTA believes the T-Third tunneling will have less effect on the BART tunnels than the successful MMT tunneling. The MMT tunneling was parallel to and above the BART tunnels. The T-Third tunnels will be perpendicular and below the BART tunnels. As a result, the effect on the BART tunnels will be limited. The BART tunnels, with their bolted steel linings, stiffen the ground, which will reduce the potential for T-Third tunneling to affect the BART tunnels. SFMTA is working with BART to verify that the deflection of the BART tunnels as a result of the T-Third tunneling will not adversely affect the BART tunnels or exceed the agreed limits for MMT tunneling using FLAC3D soil-structure analysis.

4. When the Fourth-Stockton Alignment was first introduced in late 2004, a vertical separation of 10 ft was assumed, prior to review of case histories of similar tunnels and significant analysis. The Board of Consultants during their April 2005 technical review workshop suggested a minimum vertical clearance from 1 ft. to 5 ft. After review of case histories of the construction of similar tunnels, including tunnels crossing under other tunnels and structures, and records from the construction of the BART tunnels, and empirical calculations the criteria for vertical clearance to BART tunnels was approved at 5ft. Revision 0 of the approved T-Third Phase 2 Design Criteria dated September 30, 2005 states "A minimum vertical separation of 5 feet (or less if confirmed by detailed analyses) shall be maintained between the extrados of new bored tunnels and the existing BART tunnels."
5. Compensation grouting is an accepted and proven method for controlling settlements above tunnels. Grout mix design, injection pressure limits, injection volume and port spacing will be tailored to the existing soil conditions and the separation between tunnels. As required by BART, compensation grouting will be performed and tested prior to tunneling reaching Market Street to check the process, procedures, crew, and equipment.
6. SFMTA will provide BART with copies of all additional geotechnical information pertinent to the tunnel crossings as it becomes available. Enclosed are draft geotechnical drill logs and profile for the additional drilling completed in April 2008 and a CD of the May 2006 Phase 1B Geotechnical Data Report.
7. Question 7 asks for detailed information on the design of the connection of the T-Third Union Square/Market Street (UMS) Station to the Powell Street Station. The connection is shown in Drawing AR-306, attached. The current plan is to use 42-inch diameter cased vertical secant piles to create structurally stiff and watertight walls on the side of the Apple store entrance/exit. BART/ARUP/SFMTA are working together to study if the Apple store entrance/exit can be reconfigured without effecting the emergency exiting capacity of the Powell Street Station. SFMTA will continue to work with and obtain BART's concurrence on the design of the connection to Powell Street Station.
8. As Bill Neilson discussed with you, he could not identify the SFMTA report that shows Figure 4.1 referred to in comment 8. I will respond to comment 8 once the report is containing Figure 4.1 is identified.
9. The present alignment of the T-Third tunnels takes into account the presence of the existing BART tunnels and is the result of thorough analyses to optimize the T-Third alignment with respect to project criteria and operational constraints. The minimum centerline distance between the T-Third tunnels is 27 ft where they cross under the BART tunnels. The extrados of the tunnels is 19.75 ft. The minimum vertical spacing is discussed in the response to comment 4. SFMTA will continue to work with BART to verify that the T-Third tunneling will not adversely affect the BART tunnels.
10. Yes. Actual field measurements will be used to monitor the BART tunnels at the crossings during construction.

11. Yes. A high-resolution laser scan (point cloud) will be made during tunnel final design to determine existing tunnel dimensions and clearance conditions and used to determine allowable tunnel deformation and movement.
12. Yes. Actual site surveys will be performed as described in comment 12.
13. Yes. Photo surveys to document the condition (including leaks) of the BART tunnels will be performed before and after construction as recommended by BART. In addition, SFMTA requests the opportunity to perform a structural inspection of the BART tunnels in early 2009. We understand that BART is in the process of investigating and mapping water intrusions into the existing tunnels and station. We request that BART include SFMTA in all investigations and discussions and share with SFMTA all information that is pertinent to the Powell Street Station and adjoining tunnels.
14. Yes. SFMTA will have a plan in place prior to crossing under the BART tunnels for repairing any new leaks that develop as a result of T-Third tunneling, including insurance, access, and clearance provisions. SFMTA requests that BART staff identify and allow SFMTA staff to inspect known leaks within the next ten days and provide us the results of on-going water intrusion surveys.
15. Yes. All surveys will be performed by a Professional Land Surveyor employed by SFMTA or its consultants. We request that BART provide access during non-revenue hours for the surveys. The collected survey measurements in conjunction with the collected field notes, leak surveys and photographs will constitute a reliable representation of the existing condition of the BART tunnels.

Please contact me at 415 701-4299 should you have any questions.

Sincerely,



John Funghi, P.E.
Program Manager

Enc: Draft 4/08 Drill Logs
Draft 4/08 Geologic Profile
CD containing Phase 1B Geotechnical Data Report prepared in May 2006 and above
logs & profile
Drawing AR-306

cc: File No. 2.30.02
William Neilson
Albert Hoe
David Greenaway

FIRST SUPPLEMENTAL MUNI/BART JOINT STATION MAINTENANCE AGREEMENT

THIS AGREEMENT, made and entered into this 1st day of JULY, 1986, by and between the CITY AND COUNTY OF SAN FRANCISCO (hereinafter called "City") and the SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT (hereinafter called "BART").

W I T N E S S E T H:

WHEREAS, City is a municipal corporation chartered under the Constitution of the State of California and is governed pursuant to the provisions of its Charter; and

WHEREAS, BART is a rapid transit district established pursuant to Public Utilities Code Sections 28500 et seq.; and

WHEREAS, Public Utilities Code Section 29037 provides that:

The district shall not interfere with or exercise any control over any transit facilities now or hereafter owned and operated wholly or partly within the district by any city or public agency, unless by consent of such city or public agency and upon such terms as are mutually agreed upon between the board and such city or public agency.

and

WHEREAS, on May 14, 1976, City and BART entered into an Agreement establishing respective duties relative to maintenance and repair of subway and other rapid transit facilities within the City and County of San Francisco; and

WHEREAS, said Agreement was entered into prior to the time MUNI commenced revenue service underground; and

WHEREAS, the parties hereto now desire to re-examine and redefine their respective responsibilities with regard to maintenance and upkeep of BART's subways and other facilities to be used and occupied by City's Municipal Railway either separately or jointly with BART:

NOW, THEREFORE, in consideration of mutual promises and the foregoing considerations, the parties hereto do mutually agree as follows:

1. Definitions:

As used through this Agreement, the following terms shall have the following meanings:

BART

"BART" shall mean the San Francisco Bay Area Rapid Transit District.

City

"City" shall mean the City and County of San Francisco.

MUNI

"MUNI" shall mean the San Francisco Municipal Railway.

Maintenance

"Maintenance" shall mean the provision of: janitorial services; wall surface repairs; repair other than structural repairs required to remedy water seepage; repair of drain inlets and cleaning of sewers; landscaping and grounds care; relamping; repairs/removal of surface vandalism; inspection, cleaning, lubrication, rehabilitation and replacement of mechanical and electrical equipment and utilities; the removal and disposal of trash and debris; and the care of

the propulsion power system, train control and/or signal systems, communications, and the trackway excluding Structural Repairs.

Surface Repairs

"Surface Repairs" shall mean surface repairs and sealing of cracks to remedy water seepage or for any other reason and shall include tunnel ring bolt tightening, replacement of caulking and broken bolts, grouting including chemical grouting, rust removal, painting and any other work required to stop seepage and seal the cracks in tunnels and station areas.

Structural Repairs

"Structural Repairs" shall mean repair of the basic structure necessitated by structural failure, but not including surface repairs.

Station

"Station" shall mean a facility which includes all necessary utilities, equipment and appurtenances necessary to handle passengers who board and alight from transit vehicles with the exception of the track, propulsion power system, train control, communications and/or signal systems which may be contained in the station structure.

Portal

"Portal" shall mean that structure used to provide a transition from subway to surface operation or from surface to subway operations.

Joint Use Stations

Powell Street, Montgomery Street, Civic Center and Embarcadero Stations (including mezzanine extensions) are designated as Joint Use Stations.

Joint Use Areas

"Joint Use Areas" shall mean those areas within Joint Use Stations which are used by BART and its patrons and MUNI and its patrons. It does not include BART or MUNI controlled areas.

MUNI Controlled Stations

Van Ness Avenue, Church Street, Castro Street and West Portal Stations are designated as MUNI Controlled Stations.

MUNI Controlled Areas

Areas within BART facilities that are occupied or used solely by MUNI are designated MUNI controlled areas.

MUNI Paid Areas

Those portions of MUNI controlled areas to which MUNI patrons have access after paying a "fare" shall be designated as MUNI Paid Areas, as well as the MUNI station agent booth(s).

Trackway

"Trackway" shall mean the ties, ballast, and support slabs which support the rails and switches.

Line

"Line" shall mean any trackway along with its enclosing structure, exclusive of trackway within stations.

Utilities

"Utilities" shall mean water (fire and domestic), electricity and the required conducting systems.

2. Ownership of Stations, Lines and Appurtenances

It is agreed that BART owns, except as hereinafter qualified, the West Portal Station and a structure and portal on Duboce Avenue and that portion of BART facilities in Market Street from the Embarcadero to the Twin Peaks Tunnel. It is further agreed that the City owns the Twin Peaks Tunnel, Civic Center MUNI Electrical Substation and Church Street MUNI Electrical Substation and Hallidie Plaza, its equipment and appurtenances. **BART is the sole owner of all stations (including mezzanine extensions), line structures and appurtenant equipment constructed by BART.** City owns any appurtenances that City constructed, or may cause to be constructed. City also owns the track, rail fasteners, propulsion power system equipment, signal equipment and communication equipment constructed by BART for use exclusively by MUNI.

3. MUNI Appurtenances

Subject to prior written notice to and approval of BART, MUNI may install or cause to be installed and shall be responsible for maintenance and repair of such equipment or additional appurtenances as MUNI may desire. However, if written disapproval has not been received within 60 days of written submission by MUNI, the submission shall be deemed to have been approved by BART. This equipment and appurtenances include but are not limited to the following:

- a. Passenger information and guidance systems in addition to those installed by BART.
- b. Closed circuit T.V.
- c. Communications systems.
- d. Signal system.
- e. Public address system equipment.
- f. Wayside equipment.
- g. Fare collection equipment.
- h. Propulsion power system.
- i. Telephone systems and equipment.

4. Use and Control of BART Structures

MUNI may use those areas in BART's subway structures as hereinafter defined for the operation of MUNI's Metro system. Said areas shall include those which are necessary for MUNI operations.

- a. Areas to be used and controlled by MUNI for its operations are:
 - (1) Areas necessary for MUNI fare collection, signal system, communications, ventilation and other transit related operations.
 - (2) All lines, stations, portals, ventilation and pump structures constructed by BART from the west end of Civic Center Station to West Portal Avenue.
 - (3) Line sections designated in Contracts 1S0011, 1S0021, and 1S0051A as "MUNI Line" or "MUNI Tunnel".
 - (4) At Joint Use Stations, the MUNI Paid Area of the mezzanine, the vertical circulation areas (exclusive

of elevators) between the MUNI level and the MUNI Paid Area of the mezzanine, MUNI operations rooms, MUNI dispatcher and crew facilities, the trackway at the MUNI level and the Paid Area (platform) at the MUNI level, MUNI electrical substations and electrical rooms and all areas used for MUNI equipment, as shown on Exhibit "A" attached hereto.

- b. BART shall control all other areas in stations and subways including Joint Use Areas.
- c. In the Joint Use Stations, MUNI and its patrons shall have access at all times to MUNI controlled areas through Joint Use Areas subject to BART control, such as mezzanines, street entrances, escalators, elevators and passageways. MUNI patrons shall be permitted to use jointly with BART and its patrons public facilities in Joint Use Areas.

5. Utility Costs

- a. BART shall pay all the costs of utilities for BART lines and BART controlled stations including propulsion power.
- b. MUNI shall pay all the cost of utilities for MUNI lines and MUNI controlled stations including propulsion power.
- c. In MUNI controlled stations and MUNI controlled tunnels and lines, electricity will be metered separately from BART's electricity.
- d. In Joint Use Stations costs of all utilities excluding propulsion power will be shared by MUNI and BART. BART

shall pay 60% of the costs and MUNI shall pay 40% of the cost. BART will pay the cost of the utilities except for electricity and will bill MUNI for its share monthly, itemizing each separate utility charge on every bill. BART and MUNI will continue to have Pacific Gas & Electric bill them separately for electricity in the proportion of 60%/40% of the total usage.

6. Repairs

a. Responsibility for Repairs

- (1) Structural Repairs will be made by MUNI in all MUNI controlled stations and areas. MUNI shall notify BART in writing in advance of making any structural repairs, provide detailed plans and specifications of any such repairs, and BART may make an inspection prior to the commencement of any structural repairs by MUNI. Structural repairs by MUNI shall not be commenced without BART's prior written approval. However, if written disapproval has not been received within 60 days of written submission by MUNI, the submission shall be deemed to have been approved by BART. Under emergency conditions, MUNI may make temporary emergency repairs notwithstanding the foregoing but BART shall be notified immediately that repairs are underway.
- (2) BART shall notify MUNI in writing in advance of making any structural repairs, provide detailed

plans and specifications of any such repairs, and MUNI may make an inspection prior to the commencement of any such repairs to MUNI controlled stations and areas. BART's performance of this work will not interfere with MUNI transit operations without the approval of MUNI. However, if written disapproval has not been received within 60 days of written submission by BART, the submission shall be deemed to have been approved by MUNI.

- (3) Repair of materials and appurtenances and surface repairs in MUNI controlled stations and areas, including but not limited to fans, escalators, wall finishes, floors and sealings of cracks shall be made by MUNI. BART personnel or equipment shall not be used unless BART in its sole discretion agrees otherwise.

b. Payment for Costs.

- (1) MUNI shall pay for the cost of all Structural Repairs caused by MUNI's use of facilities, and also repairs necessitated by fires, accidents, sabotage and vandalism occurring in MUNI controlled stations and areas. All other Structural Repair costs will be paid by BART.
- (2) MUNI shall pay for the costs of all repairs specified in Subsection a(3) above.

7. Maintenance

- a. MUNI shall provide full maintenance of all stations and areas controlled by MUNI except as provided in Paragraph 7b hereof.
- b. Joint Use Stations
 - (1) BART shall be solely responsible for maintenance in all areas with the exclusion of those areas under MUNI control and Joint Use Areas.
 - (2) BART will perform all janitorial services in MUNI Paid Areas on the mezzanine level of Joint Use Stations and bill MUNI for the costs thereof.
 - (3) In Joint Use Areas BART will perform necessary maintenance, bill MUNI 50 percent of the costs thereof and MUNI shall pay same to BART.
 - (4) BART will record all Joint Use Area Maintenance charges and all charges for janitorial services in MUNI Paid Areas on the mezzanine level of Joint Use Stations. To determine the actual amount of such costs the following formulae shall be used as the basis by which BART will bill MUNI for costs in the foregoing areas:
 - (a) Labor charges + current year fringe benefits + 5% administrative overhead.*
 - (b) Material at actual costs + 5% handling costs.
 - (c) Contract costs + 5% handling costs.

* For purposes of this formula:

Fringe benefits are at a percentage rate:

-- annually determined by BART

-- charged to Federal, State, and Local grants

-- periodically reviewed by Federal, State, and
BART's external auditors.

(5) MUNI shall be solely responsible for maintenance of all MUNI controlled stations and areas with the exception of those which are BART's responsibility pursuant to Paragraph 7b(2) above and shall conduct said maintenance at its sole cost and expense.

c. Except as otherwise expressly stated herein, BART shall keep, operate and maintain all Joint Use Areas at all times in good order, condition and repair, and shall not call upon City or MUNI to maintain or repair, any structure or facilities over which BART exercises control. BART's performance of this work shall be coordinated with MUNI and shall not interfere with MUNI transit operations, except with the prior approval of MUNI. BART shall notify MUNI in writing in advance of performing any work in Joint Use Areas which will interfere with MUNI transit operations. However, if written disapproval has not been received within 60 days of written submission by BART, the submission shall be deemed to have been approved by MUNI.

d. BART and MUNI shall perform all maintenance in accordance with their annual work schedules submitted pursuant to Paragraphs 9 and 10 of this Agreement.

8. Inspection

BART shall have the right to inspect all areas covered by this Agreement. Copies of BART's inspection reports will be sent to MUNI. MUNI shall be apprised of such inspections 24 hours in advance and shall have the right to be present during any such inspection. Such inspections shall be conducted in such a manner not to unduly interfere with MUNI operations. The foregoing shall not relieve MUNI of the responsibility for making safety inspections of its own facilities and equipment.

9. Payment of MUNI Costs

BART shall prepare by February 1 of each year an estimate of the costs which MUNI will incur during the following fiscal year (July 1 to June 30) that are chargeable to MUNI hereunder. MUNI shall cause a work authorization to be prepared in such amount prior to the beginning of said fiscal year. Should BART revise this estimate during the year, BART shall so notify MUNI in writing as soon as practicable in advance of the quarter for which additional funds will be required. Subject to required MUNI and City approvals, City shall issue a supplemental work authorization as soon as practicable for the amount so required. Billing will be made monthly. MUNI shall make payment to BART, pursuant to Paragraphs 5 and 7 hereof, within 30 days of receipt of a bill.

10. Payment of BART Costs

MUNI shall prepare by February 1 of each year an estimate of the costs which MUNI will incur during the following fiscal year (July 1 to June 30) that are chargeable to BART hereunder; BART shall cause a work authorization to be prepared in such amount prior to the beginning of said fiscal year. Should MUNI revise this estimate during the fiscal year, MUNI shall so notify BART in writing as soon as practicable in advance of the quarter for which additional funds will be required. Subject to required BART approvals, BART shall issue a supplemental work authorization as soon as practicable for the amount so required. Billing will be made monthly. BART shall make payment to MUNI, pursuant to Paragraph 17 hereof, within 30 days of receipt of a bill for charges due hereunder.

11. Third-Party Liability Claims

a. Shared Obligations

BART Insurance Division and MUNI Claims shall share equally the investigation and processing of all third party liability claims resulting from accidents or injuries occurring in Joint Use Areas, the escalators at Hallidie Plaza, and the ventilation facilities (including surface grates) described in Exhibit "B" attached hereto, which is hereby incorporated in and made a part of this agreement. The settlement or payment of any claim or judgment arising from such accidents or injuries shall be shared equally, after mutual agreement by BART and MUNI as to the amount.

and/or conditions of each such settlement or payment. This obligation shall not be reduced or eliminated where only BART or City is named in the claim or action.

b. Legal and Administrative Fees and Costs

In specific cases, BART and City may agree to joint legal representation and the sharing of all costs and expenses related thereto, including legal fees of outside counsel. In the absence of such agreement, all such costs, expenses, and legal fees shall be paid by the party incurring them. Costs assessed by the court shall be shared equally. All staff and administrative costs incurred in connection with the processing of claims or litigation, including BART or City staff attorney costs, shall be the responsibility of the party incurring such costs.

c. BART and MUNI Controlled Areas and Stations

Except as provided in 11a above in regard to the escalators at Hallidie Plaza, and the ventilation facilities described in Exhibit "B", the settlement or payment of all claims and judgments, including all costs and expenses related thereto, arising from accidents or injuries in areas exclusively used and controlled by either party, shall be the responsibility of the party in control, either MUNI, on behalf of City, or BART. The party in control of the area shall bear the full amount of such settlements or payments and related costs and expenses.

12. Fire Services

BART, MUNI and City Fire Department shall maintain a program of procedures to be used during emergencies. MUNI shall provide fire fighting equipment and a fire fighting program mutually acceptable to BART and to the City Fire Department.

13. Termination

Any termination of MUNI occupancy will be resolved at a future date.

14. Interruption of Service.

In the event that service is interrupted by either party for a period in excess of 30 consecutive days, due to natural disaster, malfunction, work stoppage, acts of violence, or for any other cause, the parties agree to make every effort to cooperate to maintain services in the subway. The parties reserve the right to re-assess their respective responsibilities regarding maintenance and repair during the period of the terminated service.

15. Concessions and Advertising

BART will contract for and administer the sale of all advertising in all stations including MUNI controlled areas and stations, and be responsible for the distribution of all revenue therefrom. BART is not responsible in the event the franchisee should ever default on payment of revenue. Such advertising shall not include advertising in MUNI vehicles or on destination signs.

- a. Both MUNI AND BART will provide access to existing facilities and provide services necessary to place advertising as required by advertising agreements.

- b. BART shall distribute monthly to MUNI a portion of the revenues received from advertising franchise contracts calculated by multiplying the revenues received from advertising franchisee(s) by 16.4%, less 5% of the result for BART's administrative costs. The calculations for Fiscal Year 1986-87 are set out in Exhibit "C" attached hereto.
- c. MUNI will place all concessions in MUNI controlled stations and will retain all revenue therefrom. BART will place all concessions in all stations other than MUNI controlled stations. The sharing of revenue from concessions in Joint Use Areas shall be determined at a later date by MUNI and BART.

16. Protection of BART & MUNI Facilities

- a. MUNI and BART shall maintain adequate stray current protection to minimize current leakage. Such stray current protection shall be subject to BART approval, as to design and installation.
- b. MUNI shall make every effort to effect sufficient procedures for avoidance of communications interference. The design and installation of equipment to insure avoidance of such interference shall be subject to BART's approval. Any changes made subsequent to installation of equipment shall be coordinated with BART.
- c. BART shall make every effort to effect sufficient procedures for avoidance of communications interference.

The design and installation of equipment to insure avoidance of such interference shall be subject to MUNI's approval. Any changes made subsequent to installation of equipment shall be coordinated with MUNI.

- d. MUNI and BART shall exercise maximum effort to eliminate any interference of any kind with the operations of the other. Upon notification of such a condition by either party, the other party will take immediate action to rectify the cause.

17. Areas Outside of BART-Owned Facilities

Maintenance of the escalators at Hallidie Plaza shall be a MUNI responsibility but BART shall pay 50% of the cost of the maintenance of said escalators in Hallidie Plaza. MUNI shall add to each bill a 5% charge for administrative costs. Except as otherwise provided here and in Paragraph 11 above, BART shall not be responsible financially or otherwise for repair and maintenance at Hallidie Plaza or any other area outside of BART ownership.

18. Operations

a. MUNI Controlled Stations

MUNI shall have the right to operate its transit vehicles in its sole discretion. Installation of facilities which will change the architectural appearance of the station or be physically attached to the station shall be subject to BART approval. However, if written disapproval has not been received within 60 days of written submission by MUNI, the submission shall be deemed to have been approved by BART.

b. Joint Use Stations

MUNI shall have the right to operate its transit vehicles in any manner that MUNI deems necessary within the area shown on attached Exhibit "A". Installation of facilities which will change the architectural appearance of the station, be physically attached to the station, or which may adversely affect BART in any manner, shall be subject to BART approval. However, if written disapproval has not been received within 60 days of written submission by MUNI, the submission shall be deemed to have been approved by BART.

19. Indemnification

Except as otherwise provided for in Paragraph 11, BART agrees to indemnify, save harmless and defend City, its officers, agents and employees from legal liability of any nature or kind on account of any claim for damages to property or personal injuries to or death of person or persons arising out of or resulting from maintenance or repair work to be performed by BART hereunder, unless such claims arise out of the sole negligence of City, MUNI, their officers, agents or employees.

Except as otherwise provided for in Paragraph 11, City and MUNI agree to indemnify, save harmless and defend BART, its officers, agents and employees from legal liability of any nature or kind on account of any claim for damages to property or personal injuries or death of a person or persons arising out of or resulting from any repair or maintenance work to be performed by City and/or MUNI

hereunder unless such claim arises out of the sole negligence of BART, its officers, agents or employees.

In the event a claim for damages to property or personal injuries or death of person or persons arises out of or results from any maintenance or repair work to be performed jointly hereunder by City and/or MUNI and BART, liability will be shared equally by parties performing such work.

The foregoing provisions regarding indemnification are included pursuant to the provisions of Section 895.4 of the Government Code, and are intended by the parties to modify and supersede the otherwise applicable provisions of Chapter 21, Part 2, Division 3.6, Title I of the Government Code.

20. MUNI Acceptance of Control of BART Structures

- a. Upon execution of this agreement, MUNI shall accept control of BART structures on which construction has been completed and accepted by BART prior to the execution of this agreement.
- b. On BART construction contracts not completed at the time of execution of this agreement, MUNI will participate in the final inspections and indicate approval that the contract has been completed in accordance with BART contract documents prior to presentation to BART's Board of Directors for acceptance. Upon acceptance of said construction contracts by BART's Board of Directors, MUNI shall accept control of BART's structures.

c. Guaranty work by the contractor shall be the only work required of BART or BART's contractor after acceptance of the contract by BART's Board of Directors. BART will continue to administer the guaranty provisions of BART contract documents but inspections shall be made jointly by MUNI and BART.

21. Effective Date

This agreement becomes effective on July 1, 1986.

22. Correspondence

All correspondence including requests for approval shall be sent to the following addresses:

BART

General Manager (or whomever he may designate)
800 Madison Street
P.O. Box 12688
Oakland, California 94604-2688

MUNI

General Manager (or whomever he may designate)
949 Presidio Avenue
San Francisco, California 94115

23. Modification of Agreement

a. If both BART and City agree that any terms of this agreement should be modified, an Amendment to this Agreement setting forth the agreed modification shall be executed.

However, every three years from the date of execution of this Agreement any dispute or controversy then existing between BART and City with respect to any

amendment proposed by either party involving only the cost sharing provisions of Paragraphs 5d, 7b(3), 7b(4), 11, 17 and the cost and revenue sharing provisions of Paragraphs 15a, 15b, 15c of this agreement shall be submitted to arbitration pursuant to the rules of the American Arbitration Association: provided however the basic obligation of MUNI and BART to share the costs associated with liability claims in Joint Use Areas, maintenance, advertising and concessions shall not be subject to arbitration.

Pending an arbitration decision, the terms of the agreement in dispute shall remain in full force and effect. The decision of the arbitrator shall be final and conclusive on the parties and shall be deemed as a duly executed amendment to this agreement with prospective effect only. Each party shall bear its own costs of arbitration and shall share equally the costs of the neutral arbitrator.

- b. With respect to Paragraph 7b(2) MUNI may elect, after giving BART at least 90 days notice, to perform all janitorial services in MUNI Paid Areas on the mezzanine level of the Joint Use Stations at MUNI's sole cost and expense.
- c. For purposes of limiting those issues which shall be subject to binding arbitration, the following definitions shall apply:

1. Cost Sharing - Paragraph 5d -- Cost sharing as applicable to Paragraph 5d shall mean the percentage of utility and electricity costs to be paid by BART and MUNI in Joint Use Stations.
2. Cost Sharing - Paragraph 7b(3) -- Cost sharing as applicable to Paragraph 7b3 shall mean the percentage of necessary maintenance costs in Joint Use Areas to be paid by MUNI to BART.
3. Cost Sharing - Paragraph 7b(4) -- Cost sharing as applicable to Paragraph 7b(4) shall mean the formula calculated to determine the direct, administrative overhead, and the employee's fringe benefit costs chargeable to MUNI.
4. Cost Sharing - Paragraph 11 -- Cost sharing as applicable to Paragraph 11 shall mean the percentage of liability claim costs to be paid by BART and MUNI in connection with all claims of accidents or injuries sustained in the Joint Use Areas.

Proposed amendments to the agreement altering the percentage to be paid by City and BART in connection with settlement of claims of accidents or injuries sustained to Joint Use Areas through normal operations shall be subject to binding arbitration only where the proposed amendment is based upon patronage figures which show that more than 50% of the patrons using Joint Use Areas are BART patrons

or more than 50% are MUNI patrons. Any decision by an arbitrator altering the cost sharing percentage in connection with Paragraph 11 shall consider patronage forecasts for the next succeeding three year period.

5. Cost and Revenue Sharing - Paragraphs 15a and 15b -- Cost and revenue sharing as applicable to Paragraphs 15a and 15b shall mean the percentage to be shared and the methods of calculating net proceeds of all advertising.
6. Cost and Revenue Sharing - Paragraph 15c -- Cost and revenue sharing applicable to Paragraph 15c shall mean the percentage to be shared and the methods of calculating net proceeds from concessions in Joint Use Areas: provided however, proposed amendments to the agreement altering the rights and obligations of BART and City with respect to the placement and control of advertising and concessions as defined in Paragraph 15 shall require the mutual agreement of BART and City and shall not be subject to binding arbitration.
7. Cost Sharing - Paragraph 17 -- Cost sharing as applicable to Paragraph 17 shall mean the percentage of escalator maintenance costs at Hallidie Plaza to be paid by BART to MUNI.

24. Clarification and Resolution of Disputes

Whenever areas of responsibility, authority or lines of communication between BART staff and City and County of San Francisco staff require clarification, or whenever disputes regarding performance or practice under this agreement arise which cannot be settled in the normal course of events, the General Manager of BART and the General Manager of the Public Utilities Commission shall make diligent efforts to resolve the issue by any means within their authority, including joint memoranda of understanding, which shall be binding upon the parties.

25. Records and Audit

- a. BART shall maintain full and complete accounts and supporting records showing actual time devoted, other direct costs incurred, and revenue generated under this agreement in accordance with generally accepted accounting principles and practices and to a standard no less than BART uses for its own accounting.

BART shall make available to the City its work papers and supporting source documents relevant to this agreement at mutually agreed upon time(s) for purpose of auditing and verifying statements, invoices, or bills. The following BART staff will be available, as their time permits, to provide assistance and answer questions:

- (1) Department Manager of Power and Way
- (2) Department Manager of Operating Budgets and Capital Program Control
- (3) General Accounting Supervisor

b. MUNI shall maintain full and complete accounts and supporting records showing actual time devoted, other direct costs incurred, and revenue generated under this agreement in accordance with generally accepted accounting principles and practices and to a standard no less than MUNI uses for its own accounting.

MUNI shall make available to BART its work papers and supporting source documents relevant to this agreement at mutually agreed upon time(s) for purpose of auditing and verifying statements, invoices, or bills. The following PUC/MUNI staff will be available, as their time permits, to provide assistance and answer questions:

- (1) Deputy General Manager/MUNI Facilities
Maintenance
- (2) Superintendent/MUNI Ways and Structures
- (3) Assistant PUC General Manager/Finance

26. Governing Law

This Agreement shall be construed in accordance with and governed by the laws of the State of California and the Charter of the City and County of San Francisco. It constitutes the complete and exclusive statement of the agreement between the parties which supersedes all proposals, oral or written, and all other communications between the parties relating to the subject matter of this Agreement and supersedes the Agreement entered into between City and BART on May 14, 1976.

27. Severability

If any term, provision, covenant, or condition of this Agreement is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the rest of this Agreement shall remain in full force and effect and in no way shall be affected, impaired, or invalidated.

28. Third Party Beneficiary Rights

Nothing in this agreement is intended by the parties to confer beneficial rights in third parties.

29. Approvals

Whenever this agreement specifically provides for an approval by either BART, MUNI, or City, such approval shall not be unreasonably withheld by the respective entity.

IN WITNESS WHEREOF, the parties hereto have caused this agreement to be executed, in triplicate, by their duly authorized officers, on the day and year first hereinabove written.

CITY AND COUNTY OF SAN FRANCISCO

Authorized by Resolution
No. 495-86 dated 6-20-86

By John H. Taylor
Clerk of the Board of Supervisors

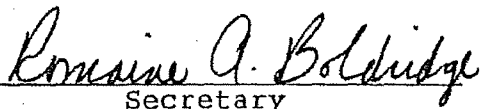
APPROVED AS TO FORM:

By Robert Duggan
Utilities General Counsel

SAN FRANCISCO PUBLIC UTILITIES COMMISSION

By 
General Manager

Authorized by Resolution
No. 86-0149 dated April 22, 1986


Secretary
Public Utilities Commission

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

By 
President, Board of Directors

By _____
District Secretary

APPROVED AS TO FORM:

By 
For BART General Counsel

Responses to Letter AB

AB-1

Over the past three years during the development of the conceptual designs for the subway alignment alternatives and connections to the Powell Street and Montgomery Street stations, the Central Subway design team has met with BART environmental, planning, and technical staff over a dozen times. Most of the issues raised in BART's December 10, 2007 comment letter (ADA compliance, safety and emergency evacuation, police, fire and emergency services, groundwater intrusion, ventilation) were previously raised with the SFMTA design team and represent technical issues that are being resolved through ongoing coordination with BART staff during the conceptual and preliminary engineering and design phases.

With mitigation measures as described in the Final SEIS/SEIR, no significant, unmitigable environmental impacts to BART facilities or service have been identified resulting from the Central Subway, however, SFMTA continues to work cooperatively to plan and design the Central Subway connection at the Powell Street Station to meet BART's requirements for expanded joint-use of the station. Technical coordination meetings are continuing between BART and SFMTA to address issues raised in the December 10 comment letter concerning the Powell Street Station and to respond to BART's concerns. BART has identified a number of improvements to the existing station that the SFMTA has included in the project design. Design modifications to the project are being incorporated, where appropriate, to ensure that the Central Subway Project would not result in significant environmental impacts to the BART system. Copies of written communications between BART and SFMTA are included as Exhibit A at the end of the Responses to Letter AB.

The procedure for addressing the safety, emergency services, groundwater intrusion, and utilities (ventilation) issues raised by BART is outlined in the 1986 Muni/BART Joint Station Maintenance Agreement, First Supplement, dated July 1, 1986. This Agreement establishes a broad range of responsibilities for all Joint-Use BART stations within the City and County of San Francisco, including the Joint-Use Station at Powell Street (see Exhibit B attached at the end of the Responses to Letter AB). In this Agreement a "station" is defined as a "facility which includes all necessary utilities, equipment and appurtenances necessary to handle passengers who board and alight from transit vehicles, with the exception of track, propulsion power system, train control, communication and/or signal systems which may be contained in the station structure." "Joint Use Areas" are defined as "those areas within Joint Use Stations which are used by BART and its patrons and MUNI and its patrons." The Agreement states that controlled areas are defined as areas occupied solely by BART or MUNI. In the Joint Use Stations,

“MUNI and its patrons shall have access at all times to MUNI controlled areas through Joint Use Areas subject to BART control, such as mezzanines (i.e.concourses), street entrances, escalators, elevators and passageways.”

BART has requested separate agreements with SFMTA to address hydrology/ ground water impacts, public safety impacts, exposure to hazardous materials during construction, and future station capacity impacts. SFMTA has proposed a single Station Improvement Coordination Plan to address construction and operation impacts, design treatments, and mitigation or station improvements for each of the issues raised in the BART letter that would result from the addition of the UMS Station.

The SFMTA/BART Draft *Station Improvement Coordination Plan [for Design and Development of Shared Use of the Powell Street Station,]* June 9, 2008 will establish the protocol and procedure for the two agencies to work together to resolve any remaining issues as the Final SEIS/SEIR is completed, a Record of Decision is issued by FTA, and the engineering moves forward into the final design phase. The Station Improvement Coordination Plan establishes technical working groups to address: 1) transit system connectivity and station capacity; 2) groundwater, structural stability, fire, life safety, and emergency systems; 3) construction impacts; and 4) funding. The majority of technical design and coordination issues fall within these categories. The Station Improvement Coordination Plan calls for development of a list of actions, key milestones, work products, and monitoring program to maintain a predictable schedule for the T-Third/Central Subway Project. This Station Improvement Coordination Plan would also be used to negotiate responsibilities and costs for structural changes to the Powell Street Station, such as the station equipment and appurtenances necessary to handle passengers who board and alight from the T-Third/Central Subway area of the Powell Street Station to be constructed and controlled by SFMTA. The next step will be for the two agencies to finalize the Station Improvement Coordination Plan.

No new significant environmental impacts resulting from the implementation of the Central Subway Project have been identified since the publication of the Draft SEIS/SEIR. All potentially significant impacts to the existing joint-use BART/Muni Metro Powell Street Station from the construction or operation of the Central Subway Project or significant effects on BART ridership and to passenger access to the Powell Street Station, potential settlement during construction of the subway tunnel under BART at Market Street, changes to the groundwater table at the Powell Street Station were identified in the Draft SEIS/SEIR and would be mitigated or minimized to less-than-significant levels.

AB-2

Commenter states that Alternatives 3A and 3B would modify the “previously approved Central Subway component of the Third Street Light Rail Project.” The 1999 Record of Decision for the Third Street Light Rail project approved the Initial Operating Segment of the project, but did not approve the subway segment of the project. The original Third Street alignment and Market Street Station (located on Third Street between Mission and Market Streets with a pedestrian connection to the BART Montgomery station) is analyzed in the SEIS/SEIR as Alternative 2 (See Figure 2-8 on page 2-16 of the SEIS/SEIR). The Fourth/Stockton Alignment (Alternatives 3A and 3B) of the Central Subway provides a direct connection to the BART/Muni Metro Market Street Subway at the Powell Street Station. This Fourth/Stockton Alignment is the result of extensive input from the public and other stakeholder groups. Although potentially feasible, SFMTA considers the Third Street Alignment (Alternative 2) less practical than Alternatives 3A and 3B and Alternative 3B was selected as the Locally Preferred Alternative by SFMTA Board on February 19, 2008. In addition to the existing Market Street entries and the Ellis Street entry to the existing joint-use Powell Street Station, this LPA Alternative 3B would add a northern entry to the subway station at Union Square on the west side of Stockton Street, along Geary Street, and potentially also on the north side of Geary Street, east of Stockton Street, in a sidewalk bulb-out. This northern entry to the station would offer additional access to Central Subway patrons beyond the existing BART station entries along Ellis or Market Streets. In particular, Muni riders transferring from the Central Subway to the 38-Geary lines would use these new station entries. A Draft May 2008 Powell Station Central Subway Impacts Study prepared by Arup Americas, Inc. for BART projects that 77 percent of Central Subway riders walking to the station will use the Geary Street entry (see next page for more detail on this study).

BART has requested physical separation of the egress from the existing Powell Street Station and the future Union Square/Market Street (UMS) Station so that in the event of an emergency situation, isolation of the two stations and emergency evacuation can be provided. This would go beyond the fire life safety standards required by the San Francisco Fire Department, but has been requested by BART to permit expanded joint-use of the Powell Street Station. To meet BART’s objective, the capacity of the Ellis Street egress, located at the Apple Store at One Stockton Street, may need to be expanded into the sidewalk area to accommodate an additional escalator or widened stairways. To maintain pedestrian circulation space and to potentially accommodate a new elevator, a bulb-out of the sidewalk into the parking lane on the north side of Ellis Street, immediately adjacent to the existing access may be required. The bulb-out would result in the loss of up to three parking spaces and one street tree, which would not be considered a significant impact.

SFMTA will continue to coordinate with BART on the joint use of the Powell Street Station, as has historically been the practice under the existing 1986 Muni/BART Joint Station Maintenance Agreement, First Supplement dated July 1986. To facilitate this coordination, BART has provided SFMTA with copies of two station capacity studies: a 2004 Powell Street BART Station Capacity Analysis Technical Memorandum prepared by BART Planning in cooperation with Robin Chiang and Company (capacity studies) and M. Lee Corporation (costs) and a May 2008 Powell Station Central Subway Impacts Study: Technical Memo 1: Data and Assumptions prepared for BART by Arup Americas Inc. A third study, conducted by Arup Americas Inc. for BART, the *Draft BART Powell Station Central Subway Impacts Phase I Study* was transmitted to SFMTA on June 23, 2008. This study is still under review by SFMTA and will be the subject of ongoing coordination between BART and SFMTA on internal station capacity enhancements.

The 2004 Technical Memoranda assessed station capacity improvements necessary to meet projected BART systemwide ridership increases by 2025. The 2004 Technical Memorandum addressed projected growth on the BART system, including the planned Central Subway Project. In terms of capacity increases for BART and Muni, the 2004 Technical Memorandum proposed to shift Muni's paid area barriers closer to the escalator and stair well, freeing up space for circulation of additional passengers in the non-paid concourse or concourse area.

The May 2008 Technical Memorandum prepared by Arup evaluated passenger activity at the Powell Street Station, with and without the implementation of the Central Subway Project. A more detailed ridership and capacity analysis was conducted in the June 2008 draft Arup passenger simulation study. SFMTA will work with BART to validate the assumptions and analysis of this study, which will be used to establish an allocation of costs for station improvements as part of the Station Improvement Coordination Plan.

SFMTA and BART have been meeting over the past year to develop the design for the connection between the Union Square/Market Street Station and the existing Powell Street Station. Although no significant impacts associated with emergency access have been identified in the Final SEIS/SEIR, BART has requested that SFMTA develop a vertical egress plan for the Union Square/Market Street Station at the existing Powell Street Station exit at One Stockton Street (the Apple Store) that would physically separate Central Subway egress from the Powell Street Station in the event of an emergency or station closure. Increasing the capacity of this egress would require physical changes to the One Stockton Street exit. The physical improvements requested by BART include:

- Expanding the existing enclosure at One Stockton Street to accommodate a widened escalator and stairway. This may require expansion beyond the existing building footprint into the sidewalk area.
- If the station entrance is expanded beyond the building footprint, a bulb-out of the sidewalk would be required to maintain pedestrian circulation on the north side of Ellis Street. This would result in the loss of up to three parking spaces and relocation of one small existing street tree. The bulb-out may also be used to accommodate a new elevator enclosure to connect the surface to the concourse level.
- Below grade and internal to the station, the existing intermediate landing at the base of the first stairway and escalator may need to be expanded to the south to accommodate additional vertical circulation width.

Text changes have been incorporated into the Final SEIS/SEIR document to reflect new less-than-significant impacts resulting from the potential station access/egress expansion.

The last sentence, third paragraph, page S-17 is revised as follows:

“In addition, this alternative would potentially eliminate 3 parking spaces on the north side of Ellis Street to accommodate an expansion of the station access/egress at One Stockton Street (the Apple Store) and a total of 59 off-street parking spaces from the Ellis/O’Farrell and Union Square parking garages.”

The following text is added after the seventh sentence, first paragraph, page 2-45:

“Widening of the existing station access/egress on the north side of Ellis Street at One Stockton Street (the Apple Store) may require a bulb-out of the sidewalk, which would result in the elimination of three parking spaces and relocation/replacement of an existing street tree.”

The following text is added to the end of the fourth paragraph on page 3-36:

“By 2030, it is projected that 4,200 additional daily riders would exit and 13,000 would enter BART at the Powell Street Station.¹ Additional passengers would use the concourse level of the station, however, passengers entries/exits from/to the street level is expected to decline. The 2008 study also shows fewer patrons using the station stairways and escalators between the street and concourse levels, because transfers to and from

BART/Muni Metro and the Central Subway on the concourse level would replace transfers to and from the systems at the street surface level.

¹ SFMTA analysis of SFCTA's 11/07 ridership projections as cited in Arup Americas, Inc. Powell Station Central Subway Impacts Study, May 2008."

The following text is added after the sixth sentence, fifth paragraph, page 6-53:

"The BART entry (escalator and stairs) at One Stockton Street (in the Apple Store) at Ellis Street would need to be closed temporarily during construction and may be expanded to meet BART's request."

AB-3

See Response to Comment AB-2 regarding the existing 1986 Muni/BART Joint Station Maintenance Agreement, First Supplement dated July 1986 that governs all joint use stations, and the Powell Street Station Capacity Analysis Technical Memorandum (2004) and the Powell Station Central Subway Impacts Study (May 2008). These documents, plus the SFMTA/BART Station Improvement Coordination Plan (2008) provide the necessary procedures and agreements for BART and SFMTA to resolve each of the technical issues raised in the comment letter related to the Central Subway Project's potential impacts at the Powell Street Station. The Station Improvement Coordination Plan stipulates the process and critical milestones for resolving the issues that would require further definition and design of project facilities beyond the preliminary design phase.

The text in the BART "Approval or Permit" column on Table S-10, page S-41 and Table 2-9, page 2-64 of the SEIS/SEIR have been revised as follows

~~"Amendment of Consistency with the 1986 Muni/BART Joint use Station Maintenance Agreement, First Supplement for Powell Street station entries, and execution of the 2008 Station Improvement Coordination Plan."~~

AB-4

As indicated in Responses to Comments AB-2 and AB-3 above, the 2004 Powell Street BART Station Capacity Analysis Technical Memorandum and the Powell Station Central Subway Impacts Study (Arup America, Inc. 2008) have addressed increases in projected use of the Powell Street Station. The 2004 Technical Memorandum describes a number of station improvements necessary to minimize future capacity issues, including: dedicating the existing elevator from the concourse to the platforms to BART and installing a new Muni-only elevator at the southwestern end of the platform; shifting Muni's paid area barriers toward the far side of the Muni escalator and stairwell thereby providing more space for

circulation in the concourse unpaid area; and capitalizing on Central Subway excavation along the Stockton alignment for BART to develop a police facility in the Hallidie Plaza area.

The general analysis done for the Draft SEIS/SEIR identified no significant impacts at the Powell Street Station, however, the Draft June 2008 Arup studies conducted for BART identified potential cumulative capacity/passenger flow and emergency vertical egress impacts in the joint-use areas at the underground Powell Street Station. While the assumptions used and the results of the study have not been fully reviewed and evaluated, the SFMTA agrees to address these issues as part of the Station Improvement Coordination Plan through monitoring of station activity levels and by incorporating project design features that will ensure the implementation of the Central Subway Project does not result in significant safety or pedestrian circulation impacts. To minimize potential station capacity impacts at the eastern end of the Powell Street Station concourse level, SFMTA and BART will explore design options to provide increased capacity for passenger flow between the Powell Street and UMS Stations. BART has identified potential for removal of the existing physical barrier on the south side of the fare gate and for relocation of the fare gates and adding up to five new fare gates to improve passenger flow in the BART non-paid area of the station. SFMTA has identified the potential for reopening a closed entrance (former CALFED entrance) to create additional capacity for pedestrian flow between the Powell Street and the UMS station. If the new pedestrian corridor is opened up under Market Street, then SFMTA will explore the possibility of adding a new elevator. SFMTA will continue to work with BART to address future potential capacity issues for station entries that may be necessary for the expansion of capacity of the joint-use station area.

A discussion of the potential for Powell Street Station impacts and an improvement measure are added as noted below to the Final SEIS/SEIR to ensure that the internal station circulation flows at the Powell Street Station meet BART's requirements for station circulation and that no new significant environmental impacts would occur as a result of the project implementation.

The sentence is added to the end of the first paragraph, page 3-44 is revised as follows to call out the potential capacity issues at Powell Street Station:

“The Powell Street Station may also experience capacity issues at the concourse level due to increased passenger activity at the northeast end of the station.”

The text of the second paragraph, page 3-44 is revised as follows:

“Mitigation measures would be the same as those outlined under Alternative 2, except as noted below.”

SFMTA and BART will prepare and enter into a Station Improvement Coordination Plan for the Powell Street Station that will provide for, at a minimum, implementation of and allocation of cost for any station infrastructure improvements necessary to maintain pedestrian safety and a pedestrian level of service of D or better at the Powell Street Station as a result of the Central Subway Project.”

The second paragraph of page 3-45 is revised as follows:

“Mitigation measures would be the same as those outlined under Alternative ~~2~~ 3A.”

Any new physical changes to the Powell Street joint-use station footprint that are identified during final design after the Final SEIS/SEIR has been certified could be analyzed separately in an Environmental Assessment to determine whether the impacts would be less-than-significant. If potentially significant environmental impacts are identified then, further environmental review as required by CEQA and NEPA would be necessary.

AB-5

Commentor correctly notes that if the need for further physical changes arises during final design for the Central Subway Project and the potential for additional impacts occurs, further environmental analysis may be required. What is described for the project and analyzed in this SEIS/SEIR document is what would be approved by the SFMTA for final design.

AB-6

The discussion on page 3-36 of the SEIS/SEIR, under Ridership Projections, states that “[at] the Powell Street Station on Market Street, the passenger activity is associated with the high level of transfers that would occur between the BART system and the Muni Metro system. It is estimated that approximately 49 percent of the passengers boarding the Central Subway system at Powell Street would be transfers from BART. Most of this transfer activity is presently occurring as passengers use Powell Street Station as a point of transfer to/from other above ground Muni routes and services, some of which would be replaced by the Central Subway light rail line.” SFMTA will continue to work with BART to identify potential capacity impacts and measures to reduce potential impacts will be identified in any future capacity studies. SFMTA will also monitor passenger flow data for the Powell Street Station prior to, and after, implementation of the Central Subway Project, and SFMTA will work with BART to monitor passenger activity levels in future years (2030) as cumulative conditions may change. A pedestrian level of service of D or better will be considered a less-than-significant impact.

See also Responses AB-2, AB-4, and AB-5 above regarding Powell Street Station capacity impacts from projected BART ridership growth.

AB-7

Section 6.3.1 (page 6-43) of the SEIS/SEIR describes the potential temporary construction impacts for pedestrian access to BART at the Powell Street Station from potential closure of the station access at One Stockton Street (the Apple Store) and pedestrian circulation at Market Street BART station entries. No significant impacts were identified. Section 6.10-2 on page 6-92 describes how “the new bored Central Subway tunnels would pass approximately five to ten feet beneath the BART tunnels resulting in a slight downward deformation of the overlying BART and Muni tunnels. As noted in the SEIS/SEIR (page 6-90 to 6-92) the potential deformation was identified as a significant impact and mitigation measures were identified. See also BART letter in Exhibit A following Responses to Letter AB.

Tunneling would be done using state-of-the-art pressurized face TBM’s that, in combination with proper operation and jet grouting, as needed, will minimize ground loss and consequent settlement effects. While no significant unmitigable impacts were identified in the SEIS/SEIR, additional studies to further ensure that potential settlement will not be significant are being completed and the information is being shared with BART. Tunneling under the tubes will be performed continually on a 24-hour basis including on weekends to prevent ground loss and significant impacts to BART service. Rigorous continuous automated monitoring of potential distortions and uplift/settlement movements experienced by the Market Street tunnels as the new tunnel construction approaches will be compared with pre-established action thresholds and prior placement of compensation grouting pipes between the Market Street tunnels and the new bored tunnels to allow immediate injection of cement grout to replace ground lost (see page 6-92 Mitigation Measures of the SEIS/SEIR). Field measurements will be conducted to monitor any movement of the BART tunnel. High resolution “point cloud” cross sectional clearance measurements will be made in advance of any construction to determine existing clearance conditions and again after the completion of construction to determine acceptable tunnel correctional variances. An actual site survey of top of rail and alignment will also be performed ahead of construction and monitored weekly once tunnel excavation is within 100 feet of the BART tunnel. If any movement in excess of ¼ inch is detected, then daily inspections will occur until detected movement falls below the ¼ inch limit.

BART would not be required to close the entire Powell Street Station or interrupt BART service at any time during construction, but temporary closure of the station entrance at One Stockton Street would be required. SFMTA will coordinate with BART to minimize disruption to transit riders due to any

temporary closures of individual station entrances (the Apple Store entry at One Stockton Street) during construction. Temporary entry closures would have less-than-significant impacts.

Although impacts to transit riders due to temporary closure of station access would be considered less-than-significant, the SFMTA has agreed to add the following improvement measure for Alternative 3B.

The following text is added to the seventh paragraph, page 6-35:

“Temporary disruption to BART service could occur during construction.”

The following text is added as a new paragraph following the second paragraph, page 6-36:

“MTA and BART will prepare and enter into a Station Improvement Coordination Plan to include construction management procedures and processes to address any and all construction and operational impacts resulting from the tunnel boring. MTA will also coordinate with BART to develop bus bridges if needed, public outreach, and other programs to minimize impacts to transit riders during construction.”

The following text is added to the last sentence, last paragraph page 6-92 and third paragraph, page 6-93:

“Tunnel construction could also result in the potential displacement of BART structures.”

AB-8

As noted in Response to Comment AB-2, although no significant impacts associated with emergency egress were identified in the SEIS/SEIR, SFMTA and BART are evaluating improvements to the existing One Stockton Street emergency egress from the combined stations at BART’s request. SFMTA will comply with the existing adopted 2006 Emergency Plan for the Powell Street Station. SFMTA will continue to coordinate with BART on the design details and will jointly revise the existing Emergency Plan for the Powell Street Station as outlined under the proposed Station Improvement Coordination Plan for the Central Subway Project, which addresses issues to be resolved during the preliminary engineering and final design stages of project development.

The San Francisco Police and Fire departments have reviewed the security and emergency response systems for the Central Subway and the SFMTA design team has incorporated suggested changes into the plans for the project to ensure there are no significant safety impacts. The subway design team will also meet with BART police to review plans during final design.

Page 5-15 of the SEIS/SEIR describes that Muni, in concert with the San Francisco Fire Department and the Department of Public Health, holds two to three emergency drills per year and emergency orientation sessions to ensure a coordinated response effort to emergencies occurring in the subway system. SFMTA has designed the emergency ventilation system for the Project such that it will not adversely effect the Powell Street BART station emergency ventilation.

The following text is added to address the additional use of the station due to the Central Subway following the fourth paragraph, page 5-15:

“Improvements to the existing Powell Street Station as needed for the connection to the UMS Station will be addressed in cooperation with BART during final design of the station connections. This will include assessment and, if necessary, implementation of improvements to the existing vertical circulation, platform capacity, lighting, ventilation system, fire suppression system and way-finding. The emergency ventilation system for the UMS shall be designed and operating procedures written/revised and tested to ensure that the UMS and Powell Street station emergency ventilation systems do not adversely affect each other during an emergency event or system test.”

No significant impacts are identified for the BART Emergency Plan or services at the Powell Street Station.

AB-9

Muni and BART currently provide security officers and would continue to provide security services at the Powell Street joint-use station for Central Subway passengers. Also, Muni “proof of payment” inspectors patrol the concourse. No significant impacts are identified for the BART security services based on increases to ridership from the Central Subway transfers, and no mitigation measures are described. Monitoring the need for added security services at the Powell Street Station would be the responsibility of both SFMTA and BART following start-up of the Central Subway operation. Resolution of issues would take place as provided for in the Station Improvement Coordination Plan and existing 1986 Muni/BART Joint Station Maintenance Agreement, First Supplement.

SFMTA will install security systems at the interface between the Powell Street Station and the UMS station and will perform a Threat and Vulnerability analysis. The San Francisco Police Department (SFPD) and SFMTA Security and Enforcement Division will provide security for the Union Square/Market Street Station (UMS). The 1986 BART/Muni Joint Station Maintenance Agreement, First Supplement includes an agreed-to process to re-apportion cost between BART and Muni based upon

actual use. SFPD and Muni “proof of payment” inspectors routinely patrol the concourse to supplement BART police provided under the Maintenance Agreement.

AB-10

The potential for construction activity to disrupt the flow of ground water to the Powell Street Station has been identified as a potentially significant impact in the SEIS/SEIR if design measures intended to maintain the existing water level at the Powell Street Station are not incorporated into the project design (see pages 5-59, 6-95, and 6-96). SFMTA is performing hydrogeologic studies and will design the UMS Station to ensure there is no increase in the height of the existing Powell Street Station groundwater table. Depending on the results of hydrogeologic modeling to be completed during the next stage of design development, measures will be developed, such as horizontal wells, to allow lateral groundwater flow past the UMS station. SFMTA will monitor and report ground water table elevations during the five to six year construction period and will work cooperatively with BART to share information, prevent or minimize increases in the height of the groundwater table, and mitigate additional water infiltration as a result of the Project. With the proposed design measures incorporated into the Central Subway Project, potential impacts would be less-than-significant.

SFMTA will have a water leak mitigation plan in place prior to tunneling under BART. This plan will include approved work plans and methods for correcting water leaks, including how BART tracks will be accessed. BART, along with SFMTA, will supervise any repairs that are required. With these measures incorporated into the project design, no significant impacts to ground water would result from the project.

AB-11

Preparation and implementation of a Health and Safety Plan that includes protection and training of site workers and worker medical surveillance is described on page 6-105 of the SEIS/SEIR as part of the mitigation measures for hazardous materials. An asbestos abatement program would be implemented as part of this plan. In addition, SFMTA and BART will prepare and enter into a Station Improvement Coordination Plan to include construction management procedures and processes for alterations to the Powell Street Station, that includes, but is not limited to, a hazardous materials abatement program, as defined by the Health and Safety Plan.

Letter AC



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December 10, 2007

Joan A. Kugler
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Re: 96.281E - Central Subway SEIS/SEIR

Dear Ms. Kugler,

Saints Peter and Paul Salesian School, established in 1925, and the Salesian Boys' and Girls' Club, established in 1918, are located across from Washington Square Park in North Beach.

The outer yard for children's recreation these organizations share is open, exposed through a chainlink fence, facing the southwest - facing the location of the proposed Central Subway's debris removal over the course of two years, should the North Beach Tunnel Construction Variant be selected.

Saints Peter and Paul Salesian School provides extended care for grades K through 2, starting before 8am. The School uses the yard throughout the day for recess, gym, and after lunch play for grades K-8. The Club actively uses the yard until 7pm, with a break at 5pm.

Aside from the disruption and hazard of truck traffic for parishioners and parents, we are most concerned about the health effects on our youth of idling trucks and the enormous amounts of dust that will be generated by this construction.

Construction noise could be disruptive to the conduct of Mass and classroom teaching.

We wish to register our concern and request the serious effects of the project on our children, those playing at the playground across the street at Washington Square Park, and senior citizens using the Park, walking to our site to pick up grandchildren or attend Mass, all be addressed in your study.

Lisa Harris, Principal
Saints Peter and Paul Salesian School
660 Filbert Street, San Francisco 94133

Russ Gumina, Director
Salesian Boys' and Girls' Club
680 Filbert Street, San Francisco 94133

Father John Itzaina, Pastor
Saints Peter and Paul Church
666 Filbert Street, San Francisco 94133

AC-1

Responses to Letter AC

AC-1

See Response to Comment AA-35. The temporary construction shaft in the middle two lanes of Columbus Avenue would be about 35 to 60 feet wide by 30 feet long, located between Union and Filbert Streets. The construction of the shaft (excavation, retaining walls, and cover) would take an estimated six months. Following excavation, the shaft would be partially decked over with a temporary cover for the future removal of the Tunnel Boring Machine at the end of the tunneling work and for periodic delivery of materials to the tunnel. The TBM extraction would take about a week. At the conclusion of the TBM extraction the shaft opening would be permanently decked over with pavement. (page 2-34 of the SEIS/SEIR).

Measures to control dust and emissions are described on page 6-110 to 6-112 of the SEIS/SEIR and include limiting idling time for construction equipment to five minutes per hour. Particulate matter filters would be installed on all diesel powered equipment. Emission limits will be established to protect the school children and mechanical air monitors will be installed at the playground to record particulates (PM 10) in the air and report emissions to the City. Measures to control dust will include watering the construction area at least twice daily, covering haul trucks with tarpaulins and terminating excavation activities when winds exceed 25 miles per hour. An on-site environmental compliance monitor and traffic control officer will be assigned to the excavation area to make sure that environmental conditions are met by the contractor. Noise levels will also be monitored for compliance with the San Francisco Noise Ordinance Limits, and a Noise Control Plan will be developed by an acoustical consultant prior to construction. Mitigation measures for noise are described in the SEIS/SEIR on page 6-117.

Letter AD (two letters)



900 Paramount Road
Oakland Ca 94610
December 7, 2007

Ms. Joan A. Kuglar
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco CA 94103

Subject: Central Subway Draft Supplemental EIR/S Dated October 2007

Dear Ms. Kuglar:

Following are comments, presented in the order of the EIR/S. Mostly they relate to the sections dealing with socioeconomic impacts per NEPA requirements and to transit operational questions:

Table S-1 Central Subway Alternatives:

In Table S-1 the 2030 ridership of Alternative 3B, (defined as T-Third Line routed to Chinatown), is projected to be 99,230 riders per weekday, 39,200 riders a day more than that of the No Project/TSM Alternative, (defined as T-Third Line merged into the existing Market Street Subway operation). This may be an interesting set of numbers, but it does not constitute an appropriate basis for evaluating the Central Subway Project.

Perhaps because of using inappropriately-defined alternatives, the difference in ridership between Alternative 3B and the No Project/TSM Alternative shown in Table S-1 appears to be excessive, particularly given Muni's 1997 projected difference of only 7,050 riders a day, the short length of the Central Subway and the very modest improvement in Clay-to-Market trip times (according to data released previously by Muni, only two minutes shorter than that of today's bus ride). **The ridership figures shown in Table S-1 should be deleted. Instead the comparison of Corridor patronages shown in Table S-5 should be used, as it more appropriately reflects the true difference between the Central Subway alternatives and the No Project/TSM alternative. The results of this Corridor comparison should be set forth and prominently displayed in Table S-1 as well as in Table S-5 and elsewhere in the EIR/S. (See additional discussion about Table S-5 below).**

The Alternative 3B one-way "in-vehicle" travel time from Fourth & King to Chinatown is shown in Table S-1 as 6.3 minutes, 10.7 minutes faster than that of the No Project/TSM Alternative. However, no similar trip time comparisons are provided of the much more significant travel connections between Market Street and Chinatown, and between Union Square and Chinatown. **The correct Market Street/Chinatown and**

AD-1

AD-2

Union Square/Chinatown projected trip times, including access times, should be prominently displayed in Table S-1 as well as elsewhere in the EIR/S.

AD-2
Cont.

Table S-2 Annual Operating Statistics:

Muni's 2030 diesel/trolley bus hours per year with Central Subway Alternative 3B is projected to be 2,545,630 hours, 76,400 hours less than with the No Project/TSM Alternative. Because the Central Subway will not serve those who currently travel on Muni Trolley Bus Lines #30 and #45 to and from points north and west of Chinatown, it will not be possible to remove or significantly cut service on these important lines. Yet without significant cuts to Lines #30 and #45 it is not clear how the Central Subway Project could allow Muni to slash so many bus hours out of its operation. **The EIR/S should include a breakdown showing the effect of the Central Subway Project on each affected Muni line and how these effects add up to the Muni service reduction figure used to calculate the Cost Effectiveness Index.**

AD-3

The 2030 total annual Muni LRV hours with Central Subway Alternative 3B is projected to be 590,100 hours, 19,400 hours less than with the No Project/TSM Alternative. It appears that this large reduction in LRV hours would be possible only if the Central Subway hours were being compared with an *inefficient* use of LRV's in the Market Street Subway. Yet with six lines currently feeding into the Market Street subway from the West it should be possible to combine the Third Street Line with one or more of these lines in a manner that would minimize redundant service. When compared with an *optimal* Market Street subway operation it is doubtful that Alternative 3B could achieve so large a savings in LRV hours over the No Project/TSM Alternative. **Additional information should be provided in the EIR/S to show the basis of this large reduction in Muni LRV hours.**

AD-4

Table S-3 Capital Cost Summary:

The ROW, Land and Existing Improvements cost is estimated to be \$20 million. In view of scores the old buildings along the route to be projected and preserved throughout the construction period, or perhaps acquired and demolished, this figure seems remarkably low. **A breakdown identifying each affected existing structure, together with the estimated cost of underpinning and otherwise protecting it during construction, or acquiring it through eminent domain, should be added to the EIR/S. Equivalent information about the cost category entitled "Site Work & Special Conditions" should also be provided and set forth in the EIR/S.**

AD-5

Table S-4 Operating and Maintenance Cost Summary:

In recent years Muni has had chronic budget problems. Indeed, because of budgetary constraints it has become increasingly difficult for Muni to provide essential transit

AD-6

services. Central Subway Alternative 3B represents an enormous capital investment, which, according to its sponsors, will result in a very large reduction in Muni operating and maintenance costs. This seems highly unlikely. As now conceived the Central Subway will create 1.7 miles of new light rail line including four new light rail vehicles, one new surface station, three new subway stations, a subway rail signaling system, a tunnel ventilation system, security and fire suppression facilities, a power distribution and overhead contact system, a fare collection system, electronic signing, handicapped and emergency egress facilities, bathrooms, closed circuit television, emergency lighting and an assortment of communication systems, all of which will require operation and maintenance and therefore generate additional operating and maintenance costs. Moreover the new line will create a substantial amount of new public space to be monitored, secured, cleaned and maintained. These new facilities will undoubtedly add significantly to Muni's operating and maintenance (O&M) budget. Yet Table S-4 shows Muni's 2030 operating and maintenance costs as being \$23.8 million a year *lower* under Alternative 3B than under the No Project/TSM Alternative.

AD-6
Cont.

The very large projected reduction in Muni O&M costs warrants a detailed explanation. The EIR/S should include a breakdown of these cost savings, including a clear delineation of the related Muni service reductions proposed for each other line in the Corridor and/or elsewhere in the Muni system. This is particularly important in view of the important effect that Table S-4's rosy projections of Muni's O&M costs would have on the Cost Effectiveness Index as set forth in Table S-9, "Summary of Mobility Improvements Evaluation".

Table S-5 Estimated Weekday Transit Ridership:

As indicated above, Table S-1, the Summary Table, shows that by 2030 Alternative 3B, apparently including the riders of the existing Third Street Line, would attract 39,200 more LRV riders per weekday than the No Project/TSM Alternative. Table S-5 shows the much more relevant ridership effect of the Central Subway Alternatives on the Third/Fourth/Stockton Corridor as a whole. According to Table S-5, Alternative 3B would attract only 14,840 more corridor transit riders per weekday than the No Project/TSM Alternative. **The financial feasibility of the \$1.4 billion Central Subway Project should be established based upon a comparison of the Corridor transit ridership of Alternative 3B versus that of the No Project/TSM Alternative as set forth in Table S-5. The results of this comparison should be set forth and prominently displayed in Table S-1.**

AD-7

Table S-1 expresses ridership as "ridership". Table S-5 expresses the same variable as "corridor boardings". **A single appropriately-defined term for this variable should be used in the EIR/S.**

AD-8

Table S-9 Summary of Mobility Improvements Evaluation:

The Cost Effectiveness Index (CEI) is one of the key parameters used by the Federal Transit Administration to evaluate proposed capital projects seeking federal financial support. The CEI is calculated using a specific formula which takes into account capital costs, transit vehicle hours saved, maintenance costs and other factors. The lower the CEI, the more cost-effective the project. In 2002 the Central Subway Project carried a CEI of over \$30.00. EIR/S Table S-9 shows the CEI of Central Subway Alternative 3B as now being only \$18.36, a remarkable reduction. **The variables used to calculate the CEI as well as the CEI formula itself should be shown in the EIR/S.**

AD-9

Table 3-11 In-Vehicle Travel Times for Selected Transit Trips:

As indicated above, a 1997 Muni report showed that the Central Subway would cut the all important trip time between Market Street and Chinatown by a mere two minutes. Yet in EIR/S Table 3-11 this trip time saving has more than doubled...to 4.7 minutes. This significant change can be at least partially explained by the fact that Table 3-11 shows *in-vehicle* trip times instead of total trip times. In other words the access time it would take prospective patrons to walk to a station, descend five stories or more to the station platform and later ascend from the subway is not included. In calculating access times consideration should also be given to the fact that Muni Bus Lines 9, 30 and 45 currently provide heavy bus service in the corridor (every three minutes during peak periods) compared to the 5 minute headways proposed for the Central Subway operation. **The EIR/S should be revised to eliminate the false impression created by the trip time figures set forth in Table 3-11.**

AD-10

Sincerely yours,



Gerald Cauthen
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cautn1@aol.com

900 Paramount Road
Oakland Ca 94610
December 9, 2007

Joan Kugler
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco CA 94103

Subject: Central Subway Draft Supplemental EIR/S dated October 2007
Supplemental Comments

Dear Ms. Kugler,

On Friday, December 7, 2007 I Fed Ex'd you a letter containing comments on the Draft EIR/S. Here are four alternatives deserving of consideration that were apparently not evaluated in the EIR/S:

- 1.) Surface solutions were considered earlier in the EIR/S process and then discarded on grounds of their being impractical. But they weren't evaluated in the context of a San Francisco congestion pricing system similar to the ones already in effect in London and other cities, and already under serious consideration by the SFCTA. With congestion pricing, surface public transit travel in downtown San Francisco could be improved in ways that would never be possible without it. If congestion pricing were applied effectively in San Francisco, it would create an opportunity to resolve the Chinatown access problem at a vastly reduced price. **Surface solutions viewed in this light should be further evaluated.**
- 2.) The Third/Kearny/Columbus alignment was apparently considered earlier in the EIR/S process and then rejected, presumably because it did not adequately serve Chinatown. This disadvantage could be overcome by installing public escalators on Washington Street and Pacific Avenue extending from the Kearny Street subway stations to Grant Avenue and then to Stockton Street. A Third/Kearny/Columbus Alignment, altered in this way, would be cheaper, more centrally located and much less disruptive than the alternatives included in the current EIR/S draft. **An altered Third/Kearny alignment deserves consideration.**
- 3.) One of the biggest flaws in the subway alternatives described in the EIR/S is that they provide no benefits to anyone living north or west of Chinatown. Because of this they saddle Muni with a very expensive subway operation without allowing significant related cuts to the existing surface bus lines operating in the corridor. This serious disadvantage could be overcome by letting electric buses as well as light rail vehicles use the subway. **An alternative featuring a bus-only or rail/bus subway deserves consideration.**

AD-11

4.) Configuring a bus-only or rail/bus subway that is shallow and without mezzanines would make it possible to also:

- o add a station at Market Street,
- o provide an efficient connection between the Central Subway and the Market Street subway systems
- o construct a second subway station in Chinatown, near or perhaps under Broadway

AD-11
Cont.

An alternative featuring a shallow bus-only or rail/bus subway without mezzanines deserves consideration.

Final Comment: CEQA guidelines require that an EIR “so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded” be revised as appropriate and recirculated (CEQA Guidelines § 15088.5 (a) (4)). **In view of the issues unresolved in the current draft, it appears that such action is warranted in this case.**

AD-12

When your responses to the above comments, and those outlined in my letter of December 7, 2007, become available, please advise us immediately. Thank you.

Sincerely yours,


Gerald Cauthen

510 208 5441
cautn1@aol.com

Responses to Letter AD (two letters)

AD-1

The ridership estimates for the Central Subway have been updated since the publication of the SEIS/SEIR as a result of updates to the operational plan and the San Francisco Model over the past year. See Chapter 5.0, Staff Initiated Changes, page 5-36 (Volume II) and Chapter 3.0, Transportation, beginning on page 3-37 of the SEIS/SEIR (Vol. I) for the new ridership projections and recommended text changes to reflect the revised projections. The ridership numbers included in the Executive Summary tables S-1 and S-5 relate to total corridor ridership for the T-Third line. To more clearly identify the net increase in transit ridership associated with the Central Subway segment of the T-Third line, additional text is recommended for Table S-1.

Based on the currently proposed operational plan, the projected travel time savings between Fourth and King and the Chinatown Station, ranges from 10 to 12.4 minutes depending on the Alternative. See Table 3-11, page 3-39 Chapter 3.0 of the SEIS/SEIR for the amended travel times and associated recommended text changes.

The following text is added to Table S-1, immediately following the 2030 Weekday Ridership T-Third Line row, page S-5:

<u>Central Subway Net New Transit Riders</u>	--	<u>21,000</u>	<u>19,000</u>	<u>18,400</u>
--	----	---------------	---------------	---------------

The second to the last row of Table S-5 “Increase Over No Project/TSM” will also be highlighted to emphasize the net ridership increase associated with the Central Subway Project.

AD-2

The Executive Summary is intended to be a brief summary of the key findings of the SEIS/SEIR and includes in-vehicle travel times from the south (Fourth and King) to the north (Chinatown Station) end of the Central Subway Project. These travel times are repeated in Chapter 3.0 Transportation in Table 3-11, on page 3-39, where the travel times for the segment between Fourth and King and Market Street (the Market Street or Union Square/Market Street stations) are also presented. The travel times between the Market Street or Union Square/Market Street Stations and the Chinatown Station can be deduced from these travel times, however, the following text change is added to provide a quicker reference of travel times along the line.

The following text is added to Table 3-11, immediately following the Fourth/King – Market Street row, page 3-39:

<u>Market Street to Chinatown Station</u> ²	<u>3.7</u>	<u>6.5</u>	<u>2.3</u>	<u>1.1</u>	<u>1.4</u>
--	------------	------------	------------	------------	------------

The following footnote is added to Table 3-11, page 3-39:

“² Market Street is the Market Street Station under Alternative 2 and the Union Square/Market Street Station under Alternatives 3A and 3B.”

AD-3

Table 3-8, page 3-37 of the SEIS/SEIR identifies the projected average weekday ridership of not only the T-Third line, but also the 30-Stockton, 45-Union/Stockton, and 9X-San Bruno lines serving the Central Subway Corridor. The projected p.m. peak period ridership for these lines, as well as the Central Subway, are presented in Table 3-10. These bus lines would continue to operate on the surface of Stockton and Third/Fourth Streets to serve local transit trips. The headways of this service, would however, be reduced to reflect the anticipated shift of transit patrons from the surface bus lines to the subway rail line. The operational analysis for the SEIS/SEIR for the 30-Stockton assumed a reduction of 4 to 5 minutes in the peak period and two to three minutes in the off-peak periods once the Central Subway is implemented. The assumptions for the 45-Union/Stockton were a reduction of one minute in the peak periods and three to five minutes in the off-peak period.

AD-4

The analysis for the Draft SEIS/SEIR was based on operation of the T-Third as an extension of the K-Ingleside to Visitacion Valley for the No Project/TSM Alternative. With the operation of a short-line service to Mission Bay and very short line service to Fourth and Berry Streets, as proposed for the Build Alternatives, additional savings in LRV hours are achieved when compared to the No Project/TSM Alternative, where service to Mission Bay is provided by the N-Judah line. The changes to service with the implementation of the Central Subway Alternative account for the savings in LRV hours for operation of the T-Third line between Alternatives 3A and 3B and the No Project/TSM Alternative.

AD-5

The “ROW, Land, Existing Improvements” cost estimate in Table S-3 represents only the costs associated with right-of-way acquisition, including easements and out right purchases. The implementation of the project would require acquisition of one parcel for the Moscone Station (Alternatives 3A and 3B only)

and one parcel for the Chinatown Station (all Build Alternatives). An estimate of the costs associated with the protection of buildings along the corridor that could be impacted by construction has also been made (\$12 million for all Build Alternatives) and is included as part of the Site Work and Special Conditions cost estimate and is significantly higher for each of the Build Alternatives.

AD-6

The cost estimates are based on assumptions regarding service hours and miles associated with each of the project alternatives, with station costs being a variable in the estimate.

Based on the provision of more direct rail service to the Moscone Center, Union Square, and Chinatown that would be provided by the Central Subway and reduced headways on the surface trolley coach operations, a savings in system hours and miles would be realized. This cost savings translates as a savings in cost based on the cost per hour/mile formula that was used.

Subsequent to the publication of the Draft SEIS/SEIR, a more detailed Operation and Maintenance cost estimate has been developed. This new estimate takes into account additional required infrastructure, which reduces the cost savings between the No Project/TSM Alternative and the Build Alternatives. See Chapter 8.0, Financial Feasibility, for the updated costs estimates that are incorporated into the SEIS/SEIR.

AD-7

See Response to Comment AD-6 regarding revisions to the Financial Analysis. The detailed financial assessment of the Central Subway Project is included in Chapter 8.0, Financial Feasibility. The adoption of the Central Subway Project will be based on all of the information presented in the SEIS/SEIR, not just highlights included in the Executive Summary. A comparative discussion of each alternative is included in Table 8-1 on page 8-5 of the SEIS/SEIR. Incremental operating costs compared with the No Project are shown on Table 8-2 on page 8-7.

AD-8

The corridor ridership is defined as the number of boardings to the system. Text amendments are recommended to clarify the ridership information presented.

The following footnote is added to Table S-1, page S-5; Table S-5, page S-15; Table 3-8, page 3-37; Table 3-9, page 3-38; and Table 3-10, page 3-39:

“Ridership is defined as the number of passenger boardings.”

AD-9

As defined by the FTA for the New Starts process, the cost effectiveness is the change in the annualized capital and operating cost per hour of user benefits for the forecast year (2030). The formula is designed to capture the additional costs of the New Start project compared to the transportation benefits to the transit riders. The formula for this calculation is noted below:

$$\frac{(\text{Change in Annualized Capital Costs}) + (\text{Change in Annual Operating Cost})}{\text{Change in Transportation System User Benefits}}$$

The calculation is based on a comparison to the New Starts baseline or the No Project/TSM Alternative.

The Transportation System User Benefits represent the travel time savings of all transit riders in the forecast year with the implementation of the project compared to the No Project Alternative. They include reductions in walk times, wait times, transfers, and in-vehicle travel times. The Transit System User Benefit is produced by the FTA Summit software using outputs from the travel demand model.

The background for the Transportation System User Benefits is contained in the most recent New Starts report. Appendix H of the SEIS/SEIR summarizes the fiscal year 2009 revised cost effectiveness for the Central Subway Project. The cost-effectiveness index was updated in April 2008 and is \$21.12 for Alternative 3B.

The following text is added following the first sentence, first paragraph, page H-2, Appendix H:

“The formula for calculating the project cost-effectiveness is based on annualized capital and operating cost per hour of user benefits and is captured in the following formula:

$$\frac{(\text{Change in Annualized Capital Costs}) + (\text{Change in Annual Operating Cost})}{\text{Change in Transportation System User Benefit}}”$$

AD-10

As noted by the commenter, the last paragraph of page 3-38 of the SEIS/SEIR indicates that total travel times for transit patrons include walk and wait times as well as in-vehicle travel times. These out-of-vehicle travel times are accounted for in the forecast model, but can not be easily summarized given the multitude of trip origins. The language will be amended as noted below to further clarify this distinction.

The text in the last paragraph, page 3-38 is amended as follows:

“Table 3-11 presents in-vehicle travel time comparisons for selected trips using the 15-Third bus service (from 2000 before operation of the T-Third began) and travel times for selected trips under each of the alternatives. The total travel times include walk, wait, and ride (in-vehicle and out-of-vehicle) times. Out-of-vehicle travel times are influenced by such factors as service headways, location of station access points, and depth of station. These out-of-vehicle travel times are accounted for in the model and the projected transit ridership.”

AD-11

Section 2.4 of the SEIS/SEIR summarizes the development history of the Central Subway Project and identifies alternatives that were evaluated but rejected. The SEIS/SEIR evaluates not only a modified version of the Central Subway Alternative that was included in the 1998 Final EIS/EIR, but it also included alternatives that were developed and vetted during an extensive public process between 2003 and 2006. The alternatives included in the SEIS/SEIR were ultimately endorsed by the SFMTA Board at a public hearing. The majority of comments on the SEIS/SEIR have supported the implementation of a Central Subway Project, rather than requested continued evaluation of alternatives.

A brief response to the commenter’s suggested alternatives is, however, provided below:

- Surface Solutions with Congestion Pricing – A study of congestion pricing for San Francisco was recently undertaken by the San Francisco County Transportation Authority. The purpose of the study is to look at establishing a fee for autos to travel into downtown San Francisco. Implementation of such a program would not be intended to take the place of a well-developed and efficient transit system for the city. While reductions in surface congestion could occur with congestion pricing, they would not eliminate the need for improved transit service between the southeastern part of San Francisco and Chinatown as stated in the Central Subway purpose and need. For example, as described on page 1-8 of the SEIS/SEIR, daily transit trips in the Central Subway corridor are expected to grow by 20 percent by 2030, further adding to an already over capacity bus system. The Central Subway Project is part of the adopted sales tax measure, which funds transportation investments in the city.
- Third/Kearny/Columbus Alignment – The purpose and need of the Central Subway Project is specifically to improve transit connections between the southeastern part of the city and Chinatown. Alternative 2, carried forward from the 1998 EIS/EIR has a Third Street Alignment to Market Street, but provides a connection on Stockton Street, immediately north of Market Street to serve the heart of the retail district and Chinatown. Providing escalators and

underground walkways that extend two blocks from a Kearny Street corridor to the heart of Chinatown would not be a reasonable alternative for providing improved transit service to Chinatown due to distance from the major activity centers along the corridor and the associated cost of making underground connections to the Stockton Street corridor. Further, the Chinatown community has been actively involved with the Central Subway planning for the past several years and has supported the corridor along Stockton Street, with a station between Clay and Washington Streets.

Any subway alignment in the Chinatown/Financial District area would result in some surface disruption during construction. There is no evidence presented by the commenter that the Third/Kearny/Columbus Alignment would result in cost-savings or reduced impacts when compared to Build Alternatives presented in the SEIS/SEIR.

- Limited benefits to residents north or west of Chinatown – The Central Subway Project evolved from the *Four Corridor Plan* (see Response to Comment AA-1). The intent of this project has always been to enhance transit service to Chinatown through improved travel times and transit reliability. Extending transit service to North Beach could be the subject of future studies and is not included as part of the Central Subway Project. The Central Subway Project does nothing to preclude this service extension in the future. The Financial District, to the west of the corridor, is already well-served by transit.

Alternative 2 evaluated in the SEIS/SEIR is a shallow subway alternative as advocated by the commenter, but it did not result in cost savings or more efficient transit operation. It is not clear how accommodating electric buses in addition to, or instead of, light rail vehicles in the proposed subway tunnel would enhance bus service to areas north or west of Chinatown or result in cost-savings to the project. Buses operating in the tunnel would be subject to the same limited number of stops as would the LRVs and would not have a means of exiting the tunnel unless an additional portal was added in the north or an underground turnaround facility is provided to allow buses to reverse direction. Accommodating dual modes in the tunnel and adding stations or portals would be expected to increase rather than reduce the cost of the Central Subway Project.

AD-12

Comment regarding inadequacy of the SEIS/SEIR is noted. The alternatives were developed as part of a process involving extensive community participation and the potential environmental impacts of the alternatives have been fully disclosed in the SEIS/SEIR. No new information has been presented that would result in previously undisclosed significant impacts requiring recirculation of the document.

Letter AE



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Castrize Polite Apartments
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Mendelsohn House
737 Folsom Street
San Francisco, CA 94107

Wolf House
891 Howard Street
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Knox SRO
241 Sixth Street
San Francisco, CA 94103

Leland Apartments
880 Howard Street
San Francisco, CA 94103

Hotel Interol
1095 Mission Street
San Francisco, CA 94103

Bayaniban House
181 Sixth Street
San Francisco, CA 94103

www.todco.org

CENTRAL SUBWAY DSEIR 96.281E: COMMENTS
December 10, 2007

BY: Tenants and Owners Development Corp. &
Affiliates - Owners of:
801 Howard St. (200-240 Fourth St.)
321 Clementina Street (317-325 Clementina St.)
328 Tehama Street (823-825 Howard Street)
By: John Elberling, President/CEO

All Comments address issues of the DSEIR alternatives proposed for Fourth Street, which all include a Moscone Station between Howard/Folsom Streets.

2.0 Alternatives

The DSEIR in all cases fails to study an alternative location for the Moscone Center Station between Howard and Mission Streets as previously requested by Commenter. The only cursory rationale stated (page 2-61) for this omission is "conflict with a major sewer line" and "station spacing concerns."

However, diagrams in the DSEIR depict the sewer line as being located at what would be the mezzanine level with the subway beneath it anyway. There is no analytical basis provided for an assumption that a station mezzanine layout workaround is not possible. Furthermore, sewer lines are being relocated at other locations. There is no analytical basis provided for a conclusion that is not possible here.

Station spacing concerns are one of many factors in locating stations and not necessarily the principal consideration. In terms of transit service connections, it is INDISPUTABLE that locating the station closer to Mission Street would be superior environmentally. Mission Street is a principal regional mass transit corridor, heavily utilized by Golden Gate Transit and SamTrans bus lines. It is also a major MUNI bus route. As

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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

AE-1

AE-2

a practical matter, it will be approximately a 1,000 foot walk from a where a southbound car would stop in a Central Subway Station between Howard and Folsom Street and Mission Street, and an also equal distance from the Union Square/Market Street Station. An alternate Mission/Howard Station would cut that distance in half southbound, and minimize it northbound. The DSEIR does not provide estimate of the number of riders who would be making these transfers.

AE-2
Cont.

Moreover, the DSEIR totally ignores – fails to discuss – the distribution of travel demand in the Yerba Buena District. It is **INDISPUTABLE** that the principal sources of demand are all located on or north of Howard Street, including all the major retail complexes, Downtown Community College, Moscone Center, entrances to Yerba Buena Gardens, and large employers such as hotels. It is **INDISPUTABLE** that current MUNI ridership on the 30 Stockton and parallel routes drops off dramatically south of Mission Street. Most riders going/coming further south are destined for CalTrain or the Ballpark; very few get on or off at Folsom Street. Yet Folsom Street is proposed as the main station entrance for the Howard/Folsom Moscone Station! And those limited number of neighborhood residents now boarding/getting off at Folsom Street will continue to prefer the surface 30 Stockton route because it will offer many more convenient stops north of Market Street, especially close to their scattered Chinatown and North Beach destinations, rather than just the one station planned in Chinatown.

AE-3

For the above reasons is **INDISPUTABLE** that a Moscone Station between Mission/Howard Streets would provide superior service, both for regional and local demand, compared to a station one block further south. This is impossible to rationally deny.

AE-4

Therefore, the DESEIR's failure to include for full analysis a alternate Mission/Howard Moscone Station location is arbitrary and capricious, and fails to meet the minimum legal requirements of CEQA.

But aside from the question of transportation planning, the alternative is even more significant for full EIR analysis because of the impacts of project construction resulting from the proposed Howard/Folsom Moscone Station location, as described below.

6.0 Construction Impacts

The DSEIR utterly fails to discuss the special vulnerabilities of our senior housing and its frail elderly residents.

AE-5

TODCO's Woolf House low-income senior housing is located at the southwest corner of Fourth and Howard Street, directly adjacent to the proposed Moscone Center Station. Its front door is on Howard Street but its garage and service entrances are located on Fourth Street. All its utility service connections are to Fourth Street. The building cannot be closed to facilitate construction disruptions along Fourth Street for several years.

Many of the 280 elderly/disabled residents of its 212 living units are very frail, mobility impaired, or wheelchair users. At least 30 suffer from respiratory illnesses. And a significant number are homebound.

The DSEIR provides no analysis of the impacts of the proposed cut-and-cover construction construction of Moscone Station on this especially vulnerable population. There is no discussion of noise impacts, especially on the homebound. All building windows are single pane. There is no discussion of air quality impacts, especially on apartments along Fourth Street. Open windows provide the only fresh air to these apartments. The DSEIR authors are well aware the property is senior housing, but have failed to make an inquiry to determine the status of its residents or the vulnerability of the building systems to construction impacts.

Therefore, the DESEIR's failure to include a full analysis of the public health impacts of construction on known vulnerable populations adjacent to cut-and-cover construction location is arbitrary and capricious, failing to meet the minimum legal requirements of CEQA.

TODCO's Ceatrice Polite Apartments senior housing is located on Clementina Street, approximately 100 feet west of Fourth Street. The adjacent lot (now the Union 76 gas station) and Clementina Street are proposed to be the staging and access areas for construction of the Moscone Station.

The status of its 120 residents living in 91 units, and the building itself, are essentially the same as Woolf House, with the same issues of noise and air quality impacts.

Additionally, a permanent vent shaft is proposed to be located directly adjacent to the Ceatrice Polite Apartments. The details of this shaft are not clear in the DESEIR – its function and its operations. So full comments are not even possible. Sound and air quality impacts would again be the key issues that must be fully analyzed by the EIR.

AE-5
Cont.

AE-6

AE-7

During construction, Clementina Street is proposed to be closed to provide access to the Moscone Station worksite. Details are not clear in the DSEIR, so full comments are not possible. But presumably access to the Ceatrice Polite Apartments parking lot about 150 feet west of Fourth Street would be maintained; if not the property becomes dysfunctional. This must be discussed. Moreover, the number of construction vehicles that would use Clementina Street to get to this access point must be discussed. The potential noise, air quality, and pedestrian safety impacts of these vehicles may be significant, given that the main entry to Ceatrice Polite Apartments and Clementina Towers public housing is located there.

AE-8

Moreover, use of Clementina Street for construction access to the Moscone Station may block its pedestrian use. This would be a serious impact for the elderly and disabled residents of Ceatrice Polite Apartments and Clementina Towers since this is their only route to Fourth Street and destinations south and east. Any detour is much longer, either north to Howard Street or west to Fifth Street, such that many residents will simply not attempt it. This also is not addressed at all in the DEIR.

AE-9

All these major construction impacts on Woolf House, Ceatrice Polite Apartments, and Clementina Towers disappear if the Moscone Station is instead located in the alternate Howard/Mission location. That block is bordered by Moscone West, the Yerba Buena Garage (which could provide a station entrance inside it) and the Metreon, thus construction impacts would be much less given there are no residents.

AE-10

Conclusion

We cannot allow this gravely defective document to become the determining environmental basis for the Central Subway project. If the analyses described above are not done, and an alternate Moscone Station location between Mission and Howard Streets is not evaluated, we will certainly appeal the EIR's Certification and then if necessary proceed with litigation.

AE-11

Our residents deserve no less. Obviously the Central Subway team thinks they do not matter.

Sincerely,



John Elberling
President/CEO

Responses to Letter AE

AE-1

The alternative station site recommended by the commenter was evaluated as part of a comprehensive reconsideration of the Moscone Station location in 2005. As stated in the SEIS/SEIR on page 2-60, a Moscone Station located on Fourth Street between Mission and Howard was also recommended by a cost reduction panel convened by SFMTA. Further evaluation of this alternative, however, revealed conflicts with the major crosstown sewer transport that is located under Fourth Street between Mission and Howard Streets. While minor sewer lines are routinely relocated, relocation of a major transport line, such as this one, is a major and costly undertaking. The sewer transport is an eight-foot diameter line that collects and carries waste to the North Beach treatment facility. It runs along Mission Street, turning south at Fourth Street, and continues west on Howard Street. The sewer line was relocated to this segment of Fourth Street to provide a connection to the Moscone Center when it was constructed. The top of the transport line is located 20-feet below the surface of Fourth Street and would extend through the potential station site. The Central Subway deep tunnel would run below the sewer line. Relocation of the sewer transport line is not feasible as it was specifically located to serve Moscone Center and the diameter of the sewer transport line would preclude a simple design solution.

SFMTA reviewed issues associated with spacing of the stations south of Market Street in consultation with the San Francisco Planning Department. The station location between Folsom and Howard Streets was preferred as this site would serve approximately 2,210 housing units (existing and proposed) within a one-quarter mile radius of the station with the potential for an additional 615 units on soft-sites in the market capture area. The station would also serve approximately 9,350 jobs (existing and proposed) in the area, the highest of any station on the corridor. Based on station spacing studies, it was determined that the Union Square/Market Street Station would overlap the Moscone Center service area and that greater consideration should be given to serving jobs and housing rather than the special event center. The service gap in the South of Market area was addressed by the addition of a surface station on Fourth Street between Brannan and Bryant in Alternative 3B.

The combination of these two issues resulted in selection of the Moscone Station site between Folsom and Howard Streets. The station access points were located closer to the residential units on Folsom Street because of the limited space for off-site station access at Fourth and Howard Streets and security concerns related to a direct connection to their site raised by Moscone Center representatives.

The basis for these decisions is further discussed in the “Working Paper Task 1.6-11 Additional Station Location and Access Studies, Revision May 24, 2005” background document cited on page 2-61 of the SEIS/SEIR and available for review at the Planning Department.

The following text changes are recommended for the end of the first paragraph, page 2-61 to further document this analysis:

“The fourth option between Mission and Howard Streets was eliminated due to the conflict with an ~~major eight-foot diameter~~ sewer transport line on Fourth Street ~~in this area~~ between Howard and Mission Streets, and station spacing concerns given the proximity of the Moscone Station between Mission and Howard Streets and a Union Square/Market Street Station between Market and Geary Streets. The sewer transport line was recently relocated to this block of Fourth Street specifically to provide a connection to Moscone Center, so moving the major sewer line is not feasible due to its size and service connection to Moscone Center. The eight-foot diameter of the sewer line, which would penetrate a station at this location, would preclude simple design solutions. In addition, shifting the station north to Mission Street would cause greater overlap of the Union Square/Market Street Station service areas and would create a service gap between the Fourth and King Station and Mission Street, thereby serving a smaller population and employment base in South of Market.”

AE-2

See Response to Comment AD-1 for discussion of station spacing. The commenter contends that a Moscone Station located at Mission Street would be the environmentally superior alternative; but that is not the conclusion reached by the design or environmental technical teams. Not only would there be otherwise avoidable significant impacts to utilities (main sewer line) with the Mission Street Station, but there would also be a smaller population and employment base served by the Central Subway. Mission Street is a major transit corridor in the City, however, Market Street is the single most heavily traveled transit corridor in the City. The service area of the Union Square/Market Street Station already overlaps with the service area of a Moscone Station located between Folsom and Howard Streets (both of which already include Mission and Market Streets). By moving the station further north to Mission Street, a service gap is created in the South of Market District. Given the substantial environmental and design issues associated with the move of the Moscone Station to Mission Street, further analysis of the transfer patterns between the Central Subway Project was not warranted.

AE-3

Travel demand in the Yerba Buena area was assessed as part of the background studies that were conducted to select the station sites that were evaluated in the SEIS/SEIR as noted in Response to Comment AE-1. Ridership on most north/south lines drop off south of Market and Mission Streets as noted by the commenter. While there may be lower bus ridership today, the number of transit patrons is projected to increase in the future in this area due to growth and improved travel times to Union Square and Chinatown by subway. The station access at Folsom Street provides a greater degree of rail service access to those residing and doing business south of Folsom Street than would occur if the station location was shifted north. Mission Street already falls within the one quarter mile service radius of the Union Square/Market Street Station.

AE-4

The commenter's statement that "a Moscone Station located at Mission Street would provide superior transit service is indisputable" is not supported by the background analysis that was done to determine station locations. The decision to reject the Mission Street station location from further analysis in the SEIS/SEIR was based on an evaluation of the facts in a process that was consistent with the reasonable standards outlined in the CEQA requirements. See Response to Comments AE-1 through AE-3.

AE-5

Station access along Fourth Street between Clementina and Folsom Streets provides accessibility to the senior population that resides in the Woolf House; it is within one block of Clementina Street along Fourth Street where the station escalator and elevator are shown on Figure 2-20 on page 2-45. Bus service on the 30 and 45 lines would also be available, thereby providing numerous travel choices. There would, however, be impacts to the business and resident populations in the vicinity of the stations during the construction period. These are summarized in Sections 6.3 through 6.15 of the SEIS/SEIR.

Access to the businesses and residences along Fourth Street would be maintained during construction of the project, though special provisions may be required to provide access during the construction period. Business access to the Woolf House is also provided along Howard Street which would not be impacted by construction. Air Quality and Noise impacts and mitigation measures are described in Sections 6.14 and 6.15. The dust and exhaust emissions control measures that would be required to minimize construction-related air quality impacts are described on pages 6-110 to 6-113 of the SEIS/SEIR. The SFMTA would be required to meet the San Francisco Noise Ordinance limits during the construction phase and the contractor would be required to hire an acoustical consultant to prepare a Noise and Vibration Control Plan that would identify all potential impacts during construction and would provide

adequate control measures to clearly demonstrate that the noise and vibration criteria and limits presented in the SEIS/SEIR would be maintained (see pages 6-117 and 6-118 of the SEIS/SEIR). In addition, a Mitigation Monitoring and Reporting Program, designed to ensure implementation of adopted mitigation measures, has been developed and is attached as Appendix I of the SEIS/SEIR.

Once a project is selected and the final design phase is initiated, a detailed construction management plan would be prepared. Outreach to the affected communities and notification of construction schedules and potential disruptions would occur. Construction complaint lines would be established to promptly resolve construction-related issues that arise.

The SEIS/SIER adequately analyzes environmental impacts and proposes mitigation measures that will minimize most impacts to a level of insignificant. More detailed studies to further clarify and refine mitigation will supplement the analysis as the project moves forward. The analysis meets reasonable standards set forth by CEQA was not conducted in an arbitrary and capricious manner as stated by the commenter.

AE-6

See Response to Comment AE-5.

AE-7

See Responses to Comment K-1 and AA-36. As noted on page 2-9 of the SEIS/SEIR, above ground emergency ventilation shafts have been incorporated into the project since adoption of the 1998 Final EIS/EIR, to replace in-street ventilation in order to meet current fire codes. These vent shafts would operate only during a system emergency or during periodic testing of the emergency response system. Regulations governing the placement of the ventilation shafts are intended to keep them elevated above any directly adjacent structures. The Moscone Station for Alternative 3 is described on page 2-28. The vent shaft would be 26 feet above the station building. See page 5-79 for a description of the noise impacts associated with the vent shafts. No adverse noise impacts are anticipated in conjunction with the operation of the ventilation shafts since they must meet requirements of the San Francisco Noise Ordinance.

The vent shafts are a life/safety feature intended to ventilate the stations in the event of an emergency, such as a fire, in which case the fans would be turned on and smoke would escape through the vent shafts to protect the safety of the patrons in the station. There would be no exhaust coming out of the vents unless there was an emergency incident.

Ambient air quality standards are designed to protect segments of the population most susceptible to the adverse effects of pollutants or sensitive receptors that include the very young, the elderly, people weak from disease or illness, or persons doing heavy work or exercise. Sensitive receptors for air quality analysis include: Yerba Buena Center, Union Square, Gordon Lau Elementary School playground, Willie “Woo Woo” Wong Playground, and Washington Square Park. (page 4-112 and page 4-120, Air Quality Section 4.11). In addition, residential areas are considered to be sensitive receptors, thus the senior housing located on Clementina Street is included as a sensitive receptor.

AE-8

Vehicular and pedestrian access to Clementina Street and local properties along the street would be maintained during the Central Subway construction. As noted on page 6-26, construction of the Moscone Station would require temporary lanes closures of Fourth Street for a period of 10 to 12 months between Folsom and Howard for installation of the shoring systems for station construction. Once the street is fully decked over, the station construction would continue underground and spoils or materials would be delivered via Clementina Street. Truck traffic for the hauling away of spoils or the delivery of construction materials would last the duration of the construction period. It is estimated that an average of 25 daily truck trips would be generated over a one-year period at the Moscone Station during construction (Alternative 3B). Temporary noise, air quality, and circulation impacts would occur adjacent to these construction sites as documented in Sections 6.3, 6.14, and 6.15 along the corridor. These temporary construction impacts were determined to be less-than-significant when appropriate mitigation measures are implemented. These mitigation measures are described for each technical topic in Chapter 6.0 of the SEIS/SEIR.

AE-9

City regulations require that pedestrian access to adjacent businesses and residences be maintained during construction activities. Some rerouting of pedestrian traffic may however be required. Construction management plans would take into account the access needs of adjacent properties as they are developed and monitoring of construction activities would ensure a prompt response if problems develop.

The text of the third sentence, third paragraph of page 6-26 is amended as follows to clarify pedestrian impacts:

“During installation of the secant piles used for shoring, the sidewalks would be either closed to pedestrians (only on segments that do not provide direct access to adjacent

buildings) or protective barriers erected to separate the public from the construction activities.”

AE-10

The commenter is correct that the impacts at Folsom Street would be eliminated if the station moved north to Mission Street, however, a new set of impacts would occur at Mission Street. The impacts associated with the main sewer transport line and the reduced service area are described in responses AE-1 and AE-2. While the construction impacts outlined for a Moscone Station located between Folsom and Howard Streets are considered less-than-significant, the disruption of a major (eight-foot diameter) sewer transport line if the station were moved north to Mission Street would be considered a significant impact because of disruption to a major utility system.

AE-11

Comment regarding the adequacy of the environmental document is noted. The analysis requested by the commenter has been completed and is included in background documents and the amended text of the SEIS/SEIR as noted above. The SEIS/SEIR has been prepared in accordance with CEQA and NEPA guidelines and the planning process for the Central Subway Project has been comprehensive and included numerous public hearings and meetings as documented in Chapter 11.0 Coordination and Consultation.

Letter AF



會老長教督基華中市藩三
 PRESBYTERIAN CHURCH IN CHINATOWN
 925 Stockton Street
 San Francisco, California 94108
 Telephone: (415) 392-1500

RECEIVED

DEC 11 2007

CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 (415) 375-5300

December 10, 2007

Bill Wycko
 Acting Environmental Review Officer
 San Francisco Planning Department
 1650 Mission Street, Suite 400
 San Francisco, CA 94103

Re: Central Subway Draft SEIS/SEIR

Dear Mr. Wycko,

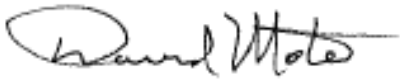
Members of our church have reviewed the environmental document and have the following comments and questions:

1. Our church supports the enhancement of transit service to Chinatown created by the subway. | AF-1
2. Placement of subway stations is a critical decision; the impacts of station placement and development should be thoroughly evaluated. | AF-2
3. Though the local preferred alternative would place the Chinatown station at 814 Stockton St., we are aware that the Municipal Transportation Agency could select Alternative 3B, which could place the station next to our church. [There is an error on p. 5-39; this location is between Washington and Clay, not Washington and Jackson.] We are gratified that under Kwan Henmi's preliminary design for this station, the height of the development steps down from the corner of Washington and Stockton to the portion of Stockton Street next to our church. Because the remodeling of our church placed windows on the north-facing side of the building, we are still concerned about the possible impact of the station on light and air. We would also like a study of how the new construction would affect the wind. Since the construction of Mandarin Towers, the wind tunnel that was created by this building makes it very difficult for many of our community's senior citizens to walk safely. We want assurance that the wind situation will not get any worse. We are concerned also about the location of the vent shafts and any noise that may be associated with the venting. Our church requests to be actively involved in any design review of the station, especially if the MTA selects 939 Stockton St. as the site. | AF-3
4. To that end, we want to be sure about the nature of the reviews the subway stations require. At what point will MTA choose its alternative? Is Table 2-9 in the EIR complete? Will the subway stations be subject to further environmental review? Will the stations and their designs be approved as part of the total subway project or under separate actions? | AF-4

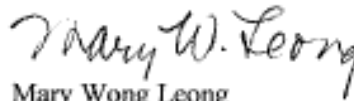
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|---|-------|
| 5. As part of the Chinatown community, our church is concerned about the residents and small businesses that would be affected by the project. We would like to see a more detailed description of the mitigations proposed by MTA to address the displacement impacts. | AF-7 |
| 6. We especially would urge that there be no construction activity on Sundays. | AF-8 |
| 7. The Affected Environment-Land Use chapter of the EIR emphasizes the commercial and residential uses in Chinatown, but seems to suggest that schools and other institutions are “exceptions” to the normal pattern of land uses on Stockton Street. When the Planning Department updated the General Plan for Chinatown in the 1980s, it emphasized Chinatown’s three roles—as a residential/commercial neighborhood, visitor center and “capital city.” The paragraph on Chinatown should be rewritten to recognize that institutions are an integral part of Chinatown, the historic heart of the Chinese-American community. | AF-9 |
| 8. Related to this point, Table 4-7 (PUBLIC AND COMMUNITY FACILITIES WITHIN THE CORRIDOR) omitted several community facilities on or near the subway, including the Chinese Historical Society, at 965 Clay St.; Donaldina Cameron House, at 920 Sacramento St.; the Chinatown YMCA, at 855 Sacramento St.; the First Chinese Baptist Church, at 15 Waverly Pl.; and, finally, our church, the Presbyterian Church in Chinatown, at 925 Stockton St. | AF-10 |

We look forward to your responses to our comments and questions.

Adopted by action of Session [the church’s governing body] at its December 9 meeting. Signed on behalf of the Session.



David Mote
Moderator



Mary Wong Leong
Clerk

Responses to Letter AF

AF-1

Comment noted regarding support by the Church for the enhancement of transit service to Chinatown provided by the subway project.

AF-2

Impacts of the Chinatown Station alternatives are described in Section 3.0 for traffic, parking and transit pedestrian access, Section 5.0 for operation of the subway project, and Section 6.0 for construction-related impacts. The impacts of the Chinatown Station alternatives are evaluated for all environmental topics.

AF-3

The description on page 5-39 for the Chinatown Station under Alternative 3B is revised to note that the underground station extends to Jackson Street, but the access point is at Clay Street.

The Presbyterian Church in Chinatown, and other adjacent properties to the 933-949 Washington Street station location, will be included in community outreach meetings during development of the architectural design for the above-ground station that will occur following certification of the SEIS/SEIR. Transit-oriented development could be proposed as part of an independent project for the station in the future and would be subject to independent environmental review once a specific proposal is defined. The SFMTA station entry would require only a one-story building, however, for purposes of the worst-case environmental analysis it is assumed that a 65-foot high building could be permitted under existing zoning. A conceptual station design was developed for this SEIS/SEIR to show the extent of the build-out area that would meet City codes and zoning. A shadow analysis of the conceptual building profile has been added to the SEIS/SEIR (Appendix K). No shadows from the Chinatown Station would be cast onto the Presbyterian Church because the station would be north of the church

The text of the first sentence, last paragraph on page 5-39 is revised as follows:

“The access to the Chinatown Station for Fourth/Stockton Alignment Option B would be located on the west side of Stockton Street between Washington and ~~Jackson~~-Clay Streets (see Figures 5-12 and 5-13). The underground station platform would extend to Jackson Street.”

AF-4

The station designs for the SEIS/SEIR are conceptual only and provide a building envelop for analysis. Wind studies are generally done for buildings over 85 feet in height. In addition, wind impacts from new construction are site and design specific. Without the benefit of a specific design and given the potential maximum height of the building at 65 feet, a wind study was not warranted at this time.

AF-5

Noise from vent shafts would be less-than-significant from the passage of underground trains and the testing and operation of the emergency ventilation fans. This noise would not be audible over background noise. The vent shafts would be designed to meet the noise level limits of the San Francisco Noise Ordinance. No adverse impacts are anticipated since these facilities would be designed to comply with the San Francisco Noise Ordinance. (page 5-79 of the SEIS/SEIR) Sound attenuation will be provided on all ventilation openings. Specific measures for the abatement of noise levels from the vent shafts will be determined during preliminary and final design. MTA will continue to involve the church and Chinatown representatives during project design.

AF-6

SFMTA selected a Locally Preferred Alternative at the February 19, 2008 meeting of the Board, however, the Project is not scheduled to be adopted by SFMTA until fall of 2008, following certification of the Final SEIS/SEIR. The LPA was revised from 3A to 3B, with the station entry at 933-949 Washington Street. Table 2-9 for Agency Approvals for the proposed project is complete and identifies the project approval by SFMTA. This SEIS/SEIR studies a generalized conceptual design for an above-ground station that would meet the City zoning guidelines. A specific transit-oriented development proposal for the Chinatown Station would be subject to independent environmental review, design review, and project approval by the Planning Department prior to approval by the SFMTA.

AF-7

Acquisition and Displacement impacts and mitigation measures are described in Section 6.5.2 on pages 6-48 to 6-54 of the SEIS/SEIR, and elaborated in Response to Comment A-4.

AF-8

Limiting above-ground construction activities on Sundays could be a part of the Conditions of Approval by the SFMTA Board, if determined feasible.

AF-9

Text revisions as noted below will be incorporated to further define the role of Chinatown.

The following text is added to the end of the fourth paragraph, page 4-6:

“Chinatown’s role as a residential and commercial neighborhood, visitor center and “capital city” is highlighted in the Chinatown Plan.”

The text in the sixth sentence, second paragraph, page 4-23 is revised as follows:

“~~Other exceptions to the primary land uses include a~~ ~~A~~ Post Office and several schools, including the Chinese Central High School and Gordon Lau Elementary School are located between Clay and Washington Streets. The St. Mary's Chinese Catholic Center is located on the northeast corner of Stockton and Clay Streets and the Sun Yat-Sen Memorial Hall is on the east side of Stockton Street. The Willie “Woo Woo” Wong Playground (formerly Chinese Playground), on Sacramento Street just east of Stockton Street, is the only open space along the Corridor north of Union Square. These institutions are an integral part of Chinatown, the historic heart of the Chinese-American community.”

AF-10

Comment regarding the omission of several community facilities is noted.

Table 4-7, page 4-37 is amended as follows to include the community facilities that were previously omitted.

**TABLE 4-7
PUBLIC AND COMMUNITY FACILITIES WITHIN THE CORRIDOR**

FACILITY	ADDRESS	JURISDICTION	ACTIVITY
South of Market/ Downtown			
Caltrain Terminal	Fourth/Townsend	Joint Powers Board	Caltrain San Francisco terminal station
Station 8	38 Bluxome	City	Fire house
Station 35	676 Howard	City	Fire house
Moscone Convention Center West	Fourth between Howard and Mission	City	Exhibit halls and meeting rooms
Moscone Convention Center	Howard between Third and Fourth	City	Exhibit halls and meeting rooms
Museum of Modern Art	Third between Howard and Mission	Private	Art museum and retail store
Yerba Buena Center for the Arts	Third/Mission	City	Theater and art center
San Francisco Community College	800 Mission	City	Business school and City College

TABLE 4-7

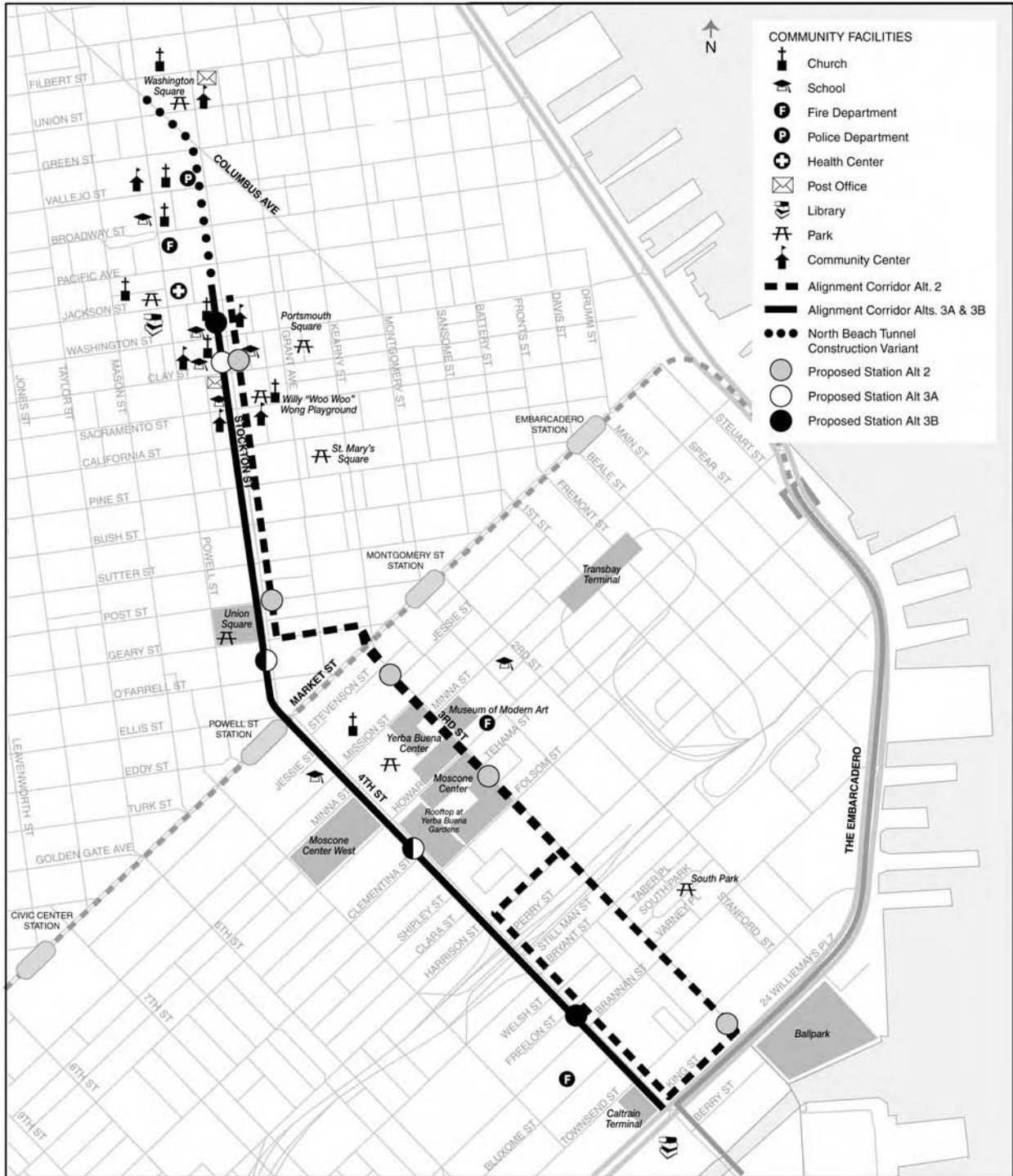
PUBLIC AND COMMUNITY FACILITIES WITHIN THE CORRIDOR

FACILITY	ADDRESS	JURISDICTION	ACTIVITY
Academy of Art	79 New Montgomery	Private	Fine arts college
Yerba Buena Community Center	Fourth between Folsom and Harrison	Private	Community Center
St. Patrick's Church	756 Mission	Private	Catholic church
Mission Bay Branch Library	960 Fourth	City	Public library

Chinatown			
<u>Chinatown YMCA</u>	<u>855 Sacramento</u>	<u>Private</u>	<u>Residential, and community center/events</u>
<u>Donaldina Cameron House</u>	<u>920 Sacramento</u>	<u>Private</u>	<u>Community Center</u>
<u>First Chinese Baptist Church</u>	<u>15 Waverly Place</u>	<u>Private</u>	<u>Baptist Church</u>
Chinese Central School	829/843 Stockton	Private	High school
Post Office	867 Stockton	Federal	Postal services
St. Mary's Chinese Day School	902 Stockton	Private	Catholic school and mission
<u>Presbyterian Church in Chinatown</u>	<u>925 Stockton</u>	<u>Private</u>	<u>Presbyterian Church</u>
Commodore Stockton School	950 Clay	SF Unified School District	Elementary school
<u>Chinese Historical Society</u>	<u>965 Clay</u>	<u>Private</u>	<u>Historical Society meetings and events</u>
Commodore Stockton Annex II	949 Washington	SF Unified School District	Child care center
Chinese Education Center	657 Merchant	SF Unified School District	Elementary school
Chinese Hospital	845 Jackson	Private	Medical services
Cumberland Presbyterian Chinese Church	865 Jackson	Private	Presbyterian church
Station 2	1340 Powell	City	Fire house
Gordon Lau Elementary School	950 Clay	SF Unified School District	Elementary School
Salvation Army Chinatown Corps	1450 Powell	Private	Sunday school, senior center, community center
Central Police Station	766 Vallejo	City	Police station
Cathay Post #384 American Legion	1524 Powell	Private	Veterans association
Pin Yuen Senior Recreation Center	799 Pacific	Private	Senior center
San Francisco Chinese Baptist Church	1524 Powell	Private	Baptist church
Chinese United Methodist Church	1009 Stockton	Private	Methodist church

Figure 4-4 on page 4-36 is amended to include the Chinese Historical Society, Donaldina Cameron House, Chinatown YMCA, First Chinese Baptist Church, and Presbyterian Church in Chinatown.

Figure 4-4



Source: PB/Wong
 Not to scale
 Revised 1/08

Comment Form AG



SAN FRANCISCO 三藩市規劃局
PLANNING DEPARTMENT

2007 11 8

November 8, 2007 二零零七年十一月八日

CITY & COUNTY OF SF
PLANNING DEPARTMENT

PUBLIC COMMENTS 公眾意見: NO TO 3B!

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Phone:
415.558.6378

Fax:
415.558.6488

Planning
Information:
415.558.6377

I SUPPORT ALTERNATIVE 3A, WITH THE CHANNUATION STATION LOCATED AT
814-818 STOCKTON STREET, ASSESSORS PAREC # 0225-014. THIS OPTION IS
THE LEAST INVASIVE TO THE COMMUNITY AND HAS A SMALL FOOTPRINT

~~IT IS STRIKINGLY~~ ^{UNDESIRABLY} OBJECT TO THE 3B ALTERNATIVE THAT PLACES THE CHANNUATION
STATION ON THE WEST SIDE OF STOCKTON STREET ^(438-435 STOCKTON) BETWEEN CLAY & WASHINGTON
— THAT DISPLACES MORE BUSINESSES AND RESIDENTS. THE PROSPECT OF A 65-FT
BUILDING THREATENS THE NEIGHBORHOOD CHARACTER AND QUALITY OF LIFE.

As a RESIDENT OF HAWAIIAN TOWNE, LIVING ACROSS FROM THIS INVASIVE STRUCTURE
POSES A THREAT OF NOISE, INCREASED FOOT TRAFFIC AND POLLUTION DEASITY.
~~THAT~~ A 65- FT BUILDING IS NOTHING LESS THAN AN IN-TOOK-FACE INTERUSION!!

ADD TO 3B!!!

請把我加入保留在你的郵寄名單內。

PLEASE ADD/KEEP ME ON YOUR MAILING LIST:

MORAYA KHAN
NAME 姓名

946 STOCKTON STREET, 11F SAN FRANCISCO CA 94108
MAILING ADDRESS 郵寄地址

PHONE NUMBER 電話號碼

morakhan@comcast.net
EMAIL ADDRESS 電郵地址

A public hearing on this Draft SEIR and other matters has been scheduled by the City Planning Commission for Thursday
November 15, 2007, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:30 p.m. or later. (Call 558-6422 the
week of the hearing for a recorded message giving a more specific time.)

關於這報告之公聽會將在本年十一月十五日的下午一時半舉行，地點為市政廳 400 號室（請於週內致
電 415-558-6422 查詢準確時間）。

Public comments will be accepted from October 17, 2007, to 5:00 p.m. on December 10, 2007. Written comments should be
addressed to Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, Central Subway Draft
SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103. Comments received at the public hearing and in
writing will be responded to in a Comments and Responses document. If you have any questions about the environmental
review of the proposed project, please call Joan A. Kugler at 575-6925.

書面意見請郵寄到 Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department,
Central Subway Draft SEIS/SEIR, 1650 Mission Street, Suite 400, San Francisco, CA 94103。截止日期 十
二月十五日下午五時。書面意見及公聽會內發表的意見將在一個'意見及回應'的文件內作答。對補充
報告有任何問題，請與規劃局 Joan A. Kugler 接洽，電話 415-575-6925。

AG-1

AG-2

Responses to Comment Form AG

AG-1

Comments in support of Alternative 3A as the least invasive to Chinatown and objecting to Alternative 3B with a potential height of 65-feet are noted. A 65-foot high building at the Chinatown Station proposed for 933-949 Stockton Street was evaluated in the SEIS/SEIR for visual and Historic District impacts as a worst-case scenario based on the maximum height that would be allowed under the existing zoning regulations. A specific proposal for transit-oriented development of the site has not yet been made and would be subject to an independent public review process that included community input. Displacement of businesses and residents and relocation under the Uniform Relocation Act are described on page 6-54 of the SEIS/SEIR.

AG-2

Commenter notes that a 65-foot height building would generate noise, foot traffic, and increased population density in the neighborhood. A specific proposal for the development of the station site has not yet been made. When a proposal is received by the Planning Department, an independent environmental analysis will be undertaken to evaluate the potential adverse impacts associated with the project. Relocation of the existing businesses in the building at 933-949 Stockton Street and the 17 residential units would be part of station development at this location (page 6-53). Existing pedestrian use of this active commercial section of Chinatown and population density is described in the Purpose and Need, Chapter 1.0.

Letter AH



LANDMARKS PRESERVATION ADVISORY BOARD

1650 Mission Street, Suite 400 | San Francisco, CA 94103-2479

TEL: 415.575.8918 | FAX: 415.550.8409

December 10, 2007

Mr. Bill Wycko
 Acting Environmental Review Officer
 San Francisco Planning Department
 1650 Mission Street, Suite 400
 San Francisco, CA 94103

Dear Mr. Wycko,

On Wednesday, October 17, 2007, November 7, 2007 and December 5, 2007, the Landmarks Preservation Advisory Board (Board) held public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the Historic Architectural Evaluation Report for the Central Subway, Phase 2 of the Third Street Light Rail Project dated October 16, 2007. After discussion the Board arrived at the following comments:

- The Board asked for clarification regarding the appendices to the historic resources report and the DEIR.
- The Board asked if any studies were performed on the feasibility of locating the Chinatown station underground or within an existing building.
- The Board had concerns with the proposed mitigation measures for impacts to historic resources. The Board felt that if the Stockton Street building was demolished or altered then documentation of the building should be stipulated as a mitigation measure.
- The Board suggested that there should be a mitigation measure that addresses the vibration monitoring and the depth of the tunnels. Furthermore, the DEIR should evaluate what the impacts to the historic districts will be and it should provide alternatives and mitigation measures that address this issue.
- The Board encourages as a mitigation measure an educational/training program for workers and consultants about potential damage to historic resources as a result of construction and vibration. Further, the Board felt that the MTA should fund and sponsor the actual designation of the potential historic districts that could be impacted by the project.

AH-1

AH-2

AH-3

AH-4

AH-5

AH-6

- The Board requested clarification regarding the vent shafts and their potential to impact historic structures. | AH-7
- The Board believes that it would be helpful if maps were included in the background studies and DEIR identifying the location of historic resources. | AH-8
- The Board believes that the loss of historic buildings needs to be assessed in terms of the economic and cultural impact to the historic districts and neighborhoods. | AH-9
- The Board recommended that the Programmatic Agreement included a thorough evaluation of a Preservation Alternative to demolishing the buildings on Stockton Street. | AH-10
- The Board recommended that the Preservation Alternatives be prepared by Preservation Architect that meets the qualifications of the Secretary of the Interior. The Board suggested including a list of unreinforced masonry buildings in the project boundary so that there could be some evaluation for the potential for damages prior to excavation. | AH-11
- The Board recommended that a Preservation Architect, not the contractor, monitor the character-defining features of historic buildings on the exterior during construction. | AH-12
- The Board feels that it would be helpful to include specific dates when reviews are scheduled to take place for the stations. | AH-13
- The Board request that any major changes to the project be brought back before the Landmarks Preservation Advisory Board for review. | AH-14
- The Board was pleased to see the protection of the street lights and generally supports the Central Subway Station Project. | AH-15

The Landmarks Preservation Advisory Board appreciates the opportunity to participate in the review of this environmental document.

Sincerely,


 Bridget Maley, President
 Landmarks Preservation Advisory Board

N:\LPA\LETTERS\Central Subway.doc

Responses to Letter AH

AH-1

The Area of Potential Effect maps for all alternatives have been added as Appendix A to the Historic Architectural Evaluation Report for the Central Subway, Phase 2 of the Third Street Light Rail Project provided to the SHPO, to the Landmarks Board and to City Planning MEA.

AH-2

The Chinatown Station platform and tracks are located underground in the subway under Stockton Street. The passenger entry to the station was originally located within the sidewalk on both sides of Stockton Street. Public concerns about pedestrian access and space constraints during the review of the original Third Street Light Rail Draft EIS/EIR in 1998, and subsequent community meetings resulted in locating station entries off congested sidewalks to private or public property. The Project Development History is described in Section 2.4, pages 2-52 to 2-62 and included consideration of four potential station entries in Chinatown (see page 2-61 and 2-62 of the SEIS/SEIR). A primary entry through the basement of the Mandarin Towers was considered and eliminated from further review because the limited amount of space available for passenger access within the existing entry to the building, for vent shafts, and access for construction. The Chinese Newcomer's Service Center parking structure at 901 Sacramento Street was considered and eliminated because it is too far from the core business/shopping area. The Ping Yuen Housing site was considered and eliminated because it is outside the study area and would disrupt residents.

AH-3

Mitigation measures for a station entry and transit-oriented development for a station in Chinatown are described on page 6-76 of the SEIS/SEIR and include: 1) partial preservation through rehabilitation, in compliance with the Secretary of the Interior's Standards, and reuse of the building as the Chinatown Station; 2) using the expertise of an architectural historian in design development of the station; 3) salvage of the significant architectural features to be used as an education exhibit inside the new station or utilized for the repair and rehabilitation of other historic buildings in the area; and 4) development of a permanent interpretive display for public use on the entire route that would include details about the demolished buildings as well and historic information about the buildings, historic district, neighborhoods, important individuals and businesses surrounding the alignments. Standard Historic American Building survey/Historic American Engineering Record documentation would also be completed. These mitigation measures described for Alternative 2 would also apply to Alternative 3A

and 3B. Rehabilitation and re-use of existing buildings for the Chinatown Station may not be practical or feasible to meet current building codes.

AH-4

Mitigation measures for vibration during construction in historic districts are described on page 6-75 of the SEIS/SEIR, and include monitoring at the closest structure to ground disturbing construction activities. Though Ground-borne vibration levels are generally not expected to impact historic buildings structural integrity, some buildings may be susceptible to minor architectural damage to trim, window casings, brick chimneys during construction. If at any time the construction activity exceeds 0.12 inches/second, that activity will immediately be halted until such time as an alternative construction method can be identified that would result in lower vibration levels. For example, pre-drilling for pile installation in areas that would employ secant piles with ground-supporting walls in the cut-and-cover construction of stations and tunnels would greatly reduce vibration levels to adjacent buildings. Text changes will be incorporated to note the need for an independent environmental compliance monitor.

The text in bullet #1 under Mitigation Measures, page 6-75, is revised as follows:

“The contractor will be responsible for the protection of vibration-sensitive historic building structures that are within 200 feet of any construction activity, including unreinforced masonry buildings.”

The text in bullet #3 under Mitigation Measures, page 6-75 is revised as follows:

~~“The contractor~~ An independent Environmental Compliance Monitor (ECM) will be retained by SFMTA to monitor construction to make sure that environmental conditions are met. The ECM will be required to perform periodic vibration monitoring at the closest structure to ground disturbing construction activities, such as tunneling and station excavation, using approved seismographs.”

The impacts to the historic districts are discussed in the SEIS/SEIR on pages 6-72 to 6-82. As noted on page 6-72, the demolition of a contributing element to an NHRP-eligible district constitutes an adverse effect under Section 106 of the National Historic Preservation Act. The removal of an historic building for construction of the Chinatown station would adversely affect the potentially eligible Chinatown Historic District. The mitigation measures for the removal of an historic contributory building in Chinatown are described on page 6-76 and 6-82. The mitigation measures would not reduce the impacts to a less-than-significant level.

AH-5

A new mitigation measure has been added to the mitigation measures on page 6-75 for vibration effects to historic building structures:

“5. The ECM will conduct a training program at the start of construction to educate the Contractor and consultants about the sensitivity of historic structures to construction related vibration.”

AH-6

As part of the environmental consulting work to prepare the original 1998 EIS/EIR Cultural Resources section, the Section 106 Historic Architectural Survey Report, and the 2007 Supplemental EIS/EIR and technical report, SFMTA has funded the work of historic architectural specialists to inventory, record and submit to the Landmarks Board, the Planning Department and the SHPO the detailed information (25 buildings along Stockton Street) necessary for the City and the SHPO to designate historic districts along the Central Subway alternative alignments. SFMTA is a transportation agency that has provided funding for the research and documentation of the potential Chinatown Historic District that is described on pages 4-65 to 4-69 on the SEIS/SEIR. A National Register of Historic Places Inventory Nomination Form for a Chinatown Historic District has been submitted in 1979 and in 1994 to the State Historic Preservation Office. Any further work on designation of a new Historic Districts is not required of SFMTA as part of the environmental process.

AH-7

The proposed vent shafts are discussed in both the Visual Resources Sections and the Cultural Resources Sections of the SEIS/SEIR. None of the proposed vent shafts would impact historic properties or districts. The vents shafts for Alternative 3A would be along the eastern end of the Union Square plaza, designed to be part of the existing plaza terraced planters. The 11 foot high vents would be positioned below the plaza level and below the café and would not constitute substantial adverse impacts to the historic character of the KMMS Conservation District or to the dominant landscape features of the historic open space (page 5-30 and page 6-77 of the SEIS/SEIR). Under Alternative 3B the vent shafts for the Union Square/Market Street subway station would be located inside of the air-well of the Ellis/O’Farrell Garage rather than in Union Square Plaza or garage.

AH-8

Area of Potential Effect (APE) Maps have been added to the Historic Architectural Evaluation Report for the Central Subway, dated November 16, 2007, and provided to the Landmark's Board. The APE maps show parcel and building numbers that correspond to the historic description and color photograph of each property surveyed.

AH-9

The impact discussion in Section 6.7.2, starting on page 6-72 of the SEIS/SEIR describes the potential impact to the historic district and historic character of the potential Chinatown Historic District and to the area adjacent to the two buildings on Stockton Street (814-828 Stockton St. and 933-949 Stockton Street) considered for demolition for the transit-oriented station development for the Central Subway Project. The removal of either of these buildings that contribute to the NRHP-eligible historic district constitutes an adverse cultural effect on the district under Section 106 of the National Historic Preservation Act of 1966. Mitigation measures to minimize impacts are described on page 6-76. Potentially adverse economic impacts to low income residents and to businesses displaced by the demolition of the buildings in Chinatown is discussed on page 6-51 to 6-54. Relocation assistance and compliance with the Uniform Relocation Act is described as mitigation for the residential and business displacement.

AH-10

SFMTA does not consider that a “full preservation alternative” is feasible for the station development at either of the two buildings in Chinatown because of the condition of the existing structures and requirements to upgrade the unreinforced masonry buildings to meet building codes and because the transit-oriented development would be necessary to replace the displaced businesses and residential units required by the Chinatown Area Plan (Policy 3.1) last amended in 1995 (Resolution 13907). A partial preservation alternative is described for the building at 814-828 Stockton Street on page 6-76 of the SEIS/SEIR that would also apply to the building at 933-949 Stockton Street under Alternative 3B.

AH-11

A revised Programmatic Agreement will be prepared as part of the Final SEIS/SEIR and submitted to the Planning Department and to the SHPO for review and comment before finalizing as part of the Record of Decision for the Central Subway project. This revised PA includes the requirement for “retaining the professional services of a City-approved architectural historian and preservation specialist, with experience in Chinatown, to work with SFMTA and Central Subway project architects to develop the design for the Chinatown station.”

The San Francisco Planning Department has an inventory of all unreinforced masonry buildings in the City that will be consulted during the next phase of project design to identify buildings adjacent to the station sites and tunnel alignment where potential construction related settlement could affect structures along the corridor. (See Section 6.10.2 Settlement or Instability of Subsurface Materials, on page 6-91 to 6-93 of the SEIS/SEIR)

AH-12

See Responses to Comments AH-4 and AH-5. The text on page 6-75 has been revised to state that an independent environmental compliance monitor would be retained to monitor construction. The ECM would retain the services of a City-approved preservation architect or architectural historian to monitor construction effects to historic structures in the APE.

AH-13

SFMTA selected a Locally Preferred Alternative at their February 2008 Board meeting (Alternative 3B). The Planning Commission is scheduled to certify the Final SEIR and complete the Master Plan Referral in July of 2008. A 30-day appeal period will follow the certification of the Final SEIR. SFMTA will hold a Public Hearing to adopt the project, along with the environmental Findings, the Mitigation Monitoring and Reporting Program, and the Overriding Considerations in Summer 2008. The Federal Transit Administration (FTA) will then prepare and issue a Record of Decision to complete the federal environmental review process and approve the project in August of 2008.

AH-14

SFMTA will keep the Landmarks Preservation Advisory Board apprised of any substantial changes to the project, and would plan to return to the Board if changes involve historic properties. The Chinatown Station designs in the SEIS/SEIR are conceptual only, to provide building height and bulk concepts for shadow and visual impact analysis. The transit-oriented development above the Chinatown Station entry will be designed during the next phase of project development and will be subject to independent environmental review and approvals. Review of the exterior treatment of the building would occur in consultation with the Planning Department, the City Historic Preservation Officer, the Landmarks Preservation Advisory Board, and the Chinatown community during preliminary and final design (page 5-34).

AH-15

Comment noted on the protection of the street lights and the support for the Central Subway Project.

LETTER AI



City and County of San Francisco
Recreation and Park Department

McLaren Lodge in Golden Gate Park
501 Stanyan Street, San Francisco, CA 94117
TEL: 415.831.2700 FAX: 415.831.2096 WEB: <http://parks.sfgov.org>

December 5, 2007

Joan Kugler
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94105

Re: Central Subway SEIS/SEIR

Dear Ms. Kugler:

Thank you for attending the Recreation and Park Commission hearing on August 16, 2007. I know that the Commissioners were pleased by the quality of MTA's presentation on the Central Subway Project. I would like to reiterate our outstanding concerns brought up at the meeting and changes to the SEIS/SEIR we are proposing during the CEQA/NEPA review process.

Under CEQ regulation 1508.14 "when an environmental impact statement (EIS) is prepared and economic or social and natural or physical environment effects are interrelated, then the EIS will discuss all of this effect on the human environment." Since the proposed Union Square station, as described in the SEIS/SEIR, would displace a number parking spaces in the Union Square Garage, then the economic effects of this displacement or reduction of usable parking during construction or after project completion should be analyzed in the SEIS/SEIR. The Recreation and Park Department believes that the loss of parking could potentially impact the City's ability to repay its debt service on the bond for the Union Square Renovation Project and would also significantly impact Department revenue. The original \$22 million cost for the project was paid with revenue bonds that were to be serviced by revenues from the Union Square Garage. In addition to debt service, the garage generates revenue used to support the Department's budget.

Therefore, the SEIS/SEIR should analyze these potential impacts for the Department both to repay the bond debt service and impacts on the Department's revenue pursuant to CEQ regulation 1508.14. If the analysis finds that the project would have a significant effect to the Department's ability to repay the bond service debt or impact the department's revenue, then the project should include mitigations to reduce or avoid this effect on the park.

The Recreation and Park Department is also concerned with the use of Hang-Ah Alley for a secondary Chinatown station entrance as proposed under Alternatives 2 and 3A. Not only would it limit the use of the alley for access to the park and disrupt passive recreation uses in the alley, it would also impact the Department's ability to program that space. In addition, the Department would incur higher maintenance and operations costs as a result of intensive commuter use of the Alley. The SEIS/SEIR should provide analysis of the possible impacts of additional costs incurred to the Department associated with the secondary entrance.



Mayor Gavin Newsom
General Manager Yoni Agumliade

AI-1

AI-2

As my staff conveyed in a comment letter on the SEIS/SEIR dated April 9, 2007, relative to the proposed Union Square station design, the Department supports the design proposal for the combined Union Square station, Alternative 3B, to locate the vent shafts in the Ellis/O'Farrell Garage and locate the MUNI entrance on the southeast corner of the park (North Geary). The Department believes that locating the vent shafts on Union Square, as described in Alternatives 2 and 3A, would have a significant visual impact on the park. The vent massing and design do not conform to the park design or architecture. The Department is looking forward to working with MTA on the final design for this alternative.

Thank you for bringing this project to the attention of the Recreation & Park Department. Please do not hesitate to contact us with any questions or concerns.

Very Truly Yours,



Yomi Aguabiade
General Manager

cc: Dawn Kamalanathan, Recreation and Park
Karen Mauney-Brodek, Recreation and Park
Daniel LaForte, Recreation and Park
Dean Macris, Planning Department
Marilyn Duffy, The Duffy Company
John Funghi, MTA

Responses to Letter AI

AI-1

The reduction in the number of parking spaces at the Union Square Garage would result in an estimated \$3,250 per space loss in the annual revenue generated at the garage, based on recent figures provided by the Recreation and Parks Department. As noted on page 6-51 of the SEIS/SEIR, the Parking Authority, which is part of the SFMTA, has authority over the Union Square Garage. The Parking Authority has indicated that revenues from the garage currently exceed the payments made against the bond debt service, therefore the potential impact would be on the general operating budgets for the departments. As part of the amendments to the management and operator agreements, fair and just compensation for the loss of parking spaces would need to be determined and made to the Parking Authority.

The following language is added before the last sentence of the first paragraph, page 6-51; following the second sentence, third paragraph, page 6-52; and following the second sentence, fifth paragraph, page 6-53:

“Compensation for the loss of parking spaces would be required in accord with the Uniform Relocation Act.”

AI-2

Page 5-17 of the SEIS/SEIR describes that there would be no reduction in the alley or playground physical space from the secondary entrance to the Chinatown station under Alternatives 2 or 3A. Additional pedestrian use of the Hang Ah and Pagoda alley would result from the secondary entry. Station and station entry maintenance would be the responsibility of SFMTA. The mitigation measure described in the SEIS/SEIR is to eliminate the secondary entry from the alley. This could be made a condition of approval for the project, however, the Locally Preferred Alternative selected by SFMTA in February 2008 is Alternative 3B that would have the station entry at 933-949 Stockton Street, on the west side of the street. This station entry would have no impacts to Hang Ah Alley.

AI-3

Comment noted. The Locally Preferred Alternative selected by the SFMTA in February of 2008 is Alternative 3B with the vent shafts located in the Ellis/O’Farrell garage.

The Visual Resources Section of the SEIS/SEIR, on Page 5-30, describe the eleven-foot high vent shafts as being integrated into the terraced planters on the east side of the plaza, and below the existing terraced plaza features. The vent shafts would not significantly distract from the landscape character in the foreground as viewed from Maiden Lane on the east side of Stockton Street. The final design of the vent

shafts for Alternative 2 or 3A would be developed in consultation with the Recreation and Park Department and Union Square Merchants Association.

Letter AJ



December 10, 2007

**CENTRAL SUBWAY DRAFT SEIS/ SEIR
COMMENTS: DILIGENT THOROUGHNESS & CREDIBILITY**

TO: Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department

BACKGROUND

I am a lifelong Muni rider, with the Stockton Street corridor being my primary transit route. I know this particular public transit system extremely well. I have been active in transportation issues, transportation committees and transportation architecture. With knowledge of the history, political context and funding forces of the Central Subway Program, I would like to raise necessary topics for the SEIS/ SEIR--in order to achieve professional thoroughness, credibility and future feedback markers.

ACCURATE ASSESSMENT OF EXISTING TRANSIT PROBLEMS

In terms of moving from North Beach/ Chinatown to Downtown and transfer points, the Stockton Street Corridor has a fairly high level of service. Wait time for the #9X, 30 and 45 bus lines is short. From North Beach, additional options include cable cars, #20 (limited hours only) and previously, the popular but now defunct #15. In comparison to other U.S. and international cities, the Stockton Corridor is a transit-rich environment. The bus system has also been contributory to a sense of urban vibrancy. Problem areas have been crowded buses, double parking and peak-hour traffic congestion. Accurate statistics are necessary to assess existing conditions in a nonpartisan manner.

AJ-1

DESIGN ALTERNATIVE: STREAMLINE THE EXISTING SYSTEM

- Initiate a Test Program to assess near-term dramatic improvements to levels of service.
- "Pay for Fare" entry onto buses, i.e. passengers can enter through front/ back doors with prepaid passes or valid transfers. Already instituted in many cities, some S.F. bus drivers practice this here.
- Many buses are half empty because passengers will not move to the back. "Pay for Fare" would help distribute passengers. In some cities, drivers will park until passengers move, allowing more passengers on board. In Japan and Asia, jamming riders onto transportation is an art--because the alternative is late and disgruntled customers.
- Efficient management of bus intervals. Currently, buses are not three minutes apart, as advertised.
- Reallocate more buses to the Stockton Corridor during peak hours.
- Increase service for the #20/ #41 buses, or resurrect the #15 bus.
- Invest in larger articulated buses, perhaps with three doors.
- Effective car/ traffic management on Stockton St. More time-restricted green/ white and yellow parking zones. Better enforcement of double parking and meters (will pay for itself). Better coordination of truck delivery times (Manhattan emphasizes early morning deliveries). Plan for a nearby automated robotic parking structure.

AJ-2

SIDE-BY-SIDE COMPARISON OF TYPICAL PASSENGER IN CURRENT/ FUTURE TRANSIT MODES

- There has been lacking an accurate portrayal of the differences between the existing transportation options and the future Central Subway. Thus, no opportunity for improvements.
- Provide charts of side-by-side comparisons of typical passenger travel experiences--in the current transportation system and in the future Central Subway System. For instance, follow a little old lady, with three bags of groceries, trace her steps from say Stockton/ Clay Sts. and Stockton/ Jackson Sts. and Stockton/ Pacific Sts. and Stockton/ Vallejo Sts.
- The charts would show what a reasonable person would do: the walking/ bus route, time elapsed, distance traveled etc. In a perfect world, this should be in the form of an animated video.
- For example, from Stockton/ Vallejo, a reasonable route would be to wait for the #9X, 20, 30, 41 or 45 at Stockton/ Columbus. So, walk 100 feet, in 3 minutes, wait 3 minutes for a bus for a 15 minute ride to Market St. to Muni Metro etc. From Stockton/ Washington St., a reasonable route could be the Central Subway. So walk 100 feet, in 3 minutes, down escalators in 3 minutes, wait 5 minutes for subway to Market St., up escalator in 3 minutes, walk 150 feet in 5 minutes to Muni Metro etc.

AJ-3

Howard Wong, AIA 128 Varennes St. San Francisco, CA 94133 (415)-982-5055 wongaia@aol.com

DISCUSS CURRENT PASSENGER PATTERNS AND DESIGN ASSUMPTIONS

- Since the 1950's to the present, from North Beach/ Chinatown, most riders will have departed the bus at or before Market St. During rush hours, some passengers get off at Sutter St. Otherwise, popular stops are Geary Blvd. and Market St. The #38 Geary Bus and Muni Metro are common transfers.
- From Downtown, most passengers get on buses at Market/ 3rd Sts. or Market/ Kearny Sts. or Stockton/ Sutter Sts. Half the passengers get off buses at Stockton/ Sacramento Sts., Sacramento/ Pacific Ave.
- For most passengers, the Stockton Corridor serves as a ½ mile to 1 mile connector. One might study the number of people who walk these distances, particularly during missed bus runs and delays.

AJ-4

ASSUME FUTURE DECREASE SERVICE OF EXISTING BUS LINES

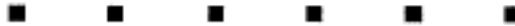
- Like the recent introduction of the T-Line Light Rail, which led to the elimination of the #15 bus, one needs to anticipate possible reduction in existing bus services—to offset operating costs of the new Central Subway. These possibilities need to be evaluated, along with potential impacts, **particularly on the above side-by-side above comparisons.**
- It would be professionally prudent and offer transparency in the total transit framework, since transportation budgets have always been constrained and in dire budgetary circumstances, have been subject to reductions.

AJ-5

EVALUATE IMPACTS ON CHINATOWN LAND VALUES, LAND USES AND HISTORIC RESOURCES

- Throughout history, vested interests have much to gain in land transactions. The new Chinatown Station and transit node will benefit some and perhaps damage others. To shed light on potential land speculation and political/ economic maneuverings, these peripheral issues should be considered.
- Particularly in one of America's most unique historic resources, Chinatown needs to preserve affordability in order to protect immigration, housing and its vibrant cultural identity.

AJ-6



Responses to Letter AJ

AJ-1

Comment noted. A frequency guide to Muni service is provided in Table 3-2, page 3-3. Characteristics of and ridership data for the existing bus and light rail system serving the study area are summarized on pages 3-5 through 3-9 of the SEIS/SEIR. Buses will continue to operate on the surface of Fourth and Stockton Streets to serve the numerous destinations of local trips that occur along the corridor. The frequency of these buses would be reduced as many riders are projected to shift from surface bus to subway rail for the longer trips and shorter travel time.

AJ-2

The commenter is describing a low-cost approach to improving the efficiency of bus service along the Fourth and Stockton Street corridor. The No Project/TSM Alternative (Alternative 1) is the low cost alternative that is evaluated in the SEIS/SEIR. Alternative 1 assumes operational improvements as outlined in the Regional Transportation Plan (RTP) to improve system operations. These improvements would be put in place under any alternative.

All alternatives assume a closed barrier system for the MTA's bus and light rail system. A "Proof of Payment" system was part of the Central Subway when the project was initially analyzed in the 1998 EIS/EIR. A change in MTA policy required that the light rail be designed as a closed-barrier fare system.

The objectives and goals for the Central Subway Project include improving transit service and mobility in the project corridor and bringing the quality of service (including service reliability) to a level available to other sections of the city. A surface alternative was evaluated as part of the screening process prior to the preparation of the Draft SEIS/SEIR. This alternative was rejected because it would increase surface congestion, particularly along Stockton Street, and would not improve transit service reliability and travel times, as set forward in the project Purpose and Need. Stockton Street is a heavily used commercial street in Chinatown that requires truck access for deliveries, which often effects Stockton Street congestion. See Response to Comment I-1 for proposed new language in the SEIS/SEIR documenting the previous evaluation of the surface alternative.

AJ-3

Comment regarding the potential trip patterns is noted. The methodology used to evaluate the Central Subway Alternatives in the SEIS/SEIR meets industry and agency accepted standards for environmental analysis. Average travel times are presented in Table 3-11 on page 3-39 (see Response to Comment AD-2 for proposed amendments to the table to provide additional information). As noted in the table, travel

times of surface bus operations that require numerous stops and are subject to surface congestion are longer than travel times would be on the Central Subway System. While access times to bus stops may be shorter than that required for access to a rail station, the waiting time for buses would be subject to delays associated with surface congestion. The additional estimated walk times for rail station access would not negate the benefits associated with reduced in-vehicle travel time for the subway alternatives (see Response to Comment AD-10 for estimated walk and wait times). Patrons would also still have the option of making their trip on local buses.

AJ-4

Station entrances for both the Union Square/Market Street Station (five entry locations) and Chinatown Station (one entry) will provide good access and egress for passengers traveling along the Stockton Street Corridor. Passengers can access other Muni streetcar lines and BART at the Powell Street Station via a two-block subsurface connection from the Union Square/Market Street Station, and can access the 2-Clement, 3-Jackson, 4-Sutter, and 38-Geary lines within one block at the surface. The Chinatown Station provides access to 1-California within one to two blocks of the station depending on the alternative. The Chinatown Station, under Alternatives 2 and 3A, is within one block of the California Street cable car line and the Alternative 3B Chinatown Station is located within one block of the Hyde Street cable car line.. In addition, surface buses would remain to serve other destinations not directly served by the Central Subway stations.

AJ-5

The operational analysis and cost estimates that were conducted for the Central Subway financial feasibility take into account cost savings associated with the reduction in frequency of service on the surface lines operating in the Central Subway Corridor.

AJ-6

Construction of a Chinatown Station would require the acquisition of one parcel of land in Chinatown. Station sites at 814-828 and 933-949 Stockton Street have been evaluated in the SEIS/SEIR. The acquisition of properties would be subject to the Uniform Relocation Act and potential transit-oriented development of the sites, while evaluated for general visual impacts is not fully evaluated in this SEIS/SEIR. Any specific proposal for development of these parcels would be independently evaluated through a public environmental and approval process that would be subject to community input. One of the recommended mitigation measures for transit-oriented development of the Chinatown Station for Alternative 3B is to include the replacement of affordable housing impacted by the building demolitions and to provide opportunities for small ground floor retail businesses as well. Demolition of the existing

building and the impact to the historic character of Chinatown is discussed on pages 6-78 to 6-82 of the SEIS/SEIR.

Letter AK



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

December 10, 2007

RECEIVED

DEC 13 2007

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
415 0

Ray Sukys
U.S. Department of Transportation
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Subject: Draft Supplemental Environmental Impact Statement for the Central
Subway, Third Street Light Rail Phase 2 Project (CEQ #20070443)

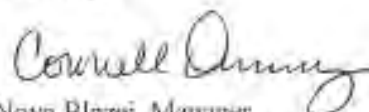
Dear Mr. Sukys:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

EPA supports several of the project's goals, including goals to reduce environmental impacts, maximize transit use, and reflect the needs and desires of the community. EPA commends the extensive community outreach and efforts to incorporate community and business concerns into the project. We look forward to the successful implementation of this project. While we have not identified environmental impacts requiring substantive changes to the document, we have identified areas where more information is requested to clarify environmental impacts and ensure project impacts are minimized. EPA has rated this document LO, *Lack of Objections*. Please see the attached *Rating Factors* for a description of our rating system.

We appreciate the opportunity to review this Draft Supplemental Environmental Impact Statement (SEIS). When the Final SEIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning, Transportation Team Lead (dunning.connell@epa.gov; 415-947-4161) or Susan Sturges, lead reviewer for this project (sturges.susan@epa.gov; 415-947-4188).

Sincerely,


For Nova Blazej, Manager
Environmental Review Office

AK-1

Enclosures: EPA's Detailed Comments
Summary of Rating Definitions

cc: Joan Kugler, City and County of San Francisco Planning Department
John Funghi, San Francisco Municipal Transportation Authority

EPA DETAILED COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE CENTRAL SUBWAY-THIRD STREET LIGHT RAIL PHASE 2 PROJECT, SAN FRANCISCO COUNTY, CALIFORNIA, DECEMBER 10, 2007

Spoil Disposal

The Draft Supplemental Environmental Impact Statement (SEIS) discloses that approximately 489,000 cubic yards (Alternative 3A) to 637,000 cubic yards (Alternative 3B) of excavated material will be generated by the project and require disposal. In addition, approximately 13,000 cubic yards of spoils (Alternative 3B) to 35,000 cubic yards of spoils (Alternative 2) would need disposal at a Class I facility. The Draft SEIS states that spoils will be transported by trucks for off-site disposal at landfills, but does not include information on the environmental effects associated with off-site spoil disposal.

Recommendation:

- Include in the Final SEIS a discussion of the environmental impacts associated with the disposal of excavated material at each potential off-site disposal site. Clarify the timeline for any additional environmental approvals required for disposal (Section 106 consultation, Clean Water Act Section 404 permit, Endangered Species Act Section 7 consultation, etc.).

AK-2

Air Quality

The control measures for dust and exhaust emissions detailed in Section 6.14 are commendable and we encourage Federal Transit Administration (FTA) to commit to these measures as mitigation in the Final SEIS and Record of Decision (ROD). Given the serious health effects that diesel particulate and other fine particulates can cause, the proposed large number of trucks and construction equipment, and the large number of sensitive receptors in the project corridor, we recommend that FTA avoid and minimize human exposure to particulate matter and diesel exhaust from the project to the greatest extent possible. In addition to these measures, we recommend additional mitigation measures for the Final SEIS and ROD below:

Recommendations:

- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment onsite, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.
- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.

AK-3

- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- To the extent feasible, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

AK-3
Cont.

Environmental Justice

EPA commends the project's extensive outreach to communities and efforts to incorporate community feedback into the project in an area with a significant number of low income and minority residents. The Draft SEIS identifies that 72 percent of households residing in the Central Subway corridor do not have vehicles and that 9 percent are unemployed compared to county average of 25 percent without vehicles and 5 percent unemployed. The project corridor includes: 1) the Chinatown neighborhood which is 92 percent minority (largely Asian) with a large elderly population, and 2) the Downtown and South of Market areas with a larger concentration of African Americans with 76 percent of the community minority.

AK-4

Project build alternatives will result in the relocation of 8 to 10 businesses and from 1 or 2 residential units up to 17 residential units in a predominantly minority and low income neighborhood for the construction of the Chinatown Station. The Draft SEIS identifies redeveloping the Chinatown Station site with affordable housing units above the station and ground floor retail where possible as a recommendation to minimize effects of the project. To ensure that impacts associated with relocation are minimized to the greatest degree possible, EPA provides the following recommendation:

Recommendation:

- In Final SEIS and ROD, commit to the redevelopment of affordable housing and ground retail on station sites as recommended in the Draft SEIS. Identify in the Final SEIS: 1) the timing and location of the redevelopment strategies, 2) the responsible party for the redevelopment, and 3) how the redevelopment can be incorporated into the Central Subway construction schedule.

Project Funding Shortfall

Section 8.1.4 of the Draft SEIS estimates that \$424 of local capital funding is still unidentified for the project.

Recommendation:

- In the Final SEIS, ensure that strategies identified in the Draft SEIS to accommodate the funding shortfall (or other strategies identified in the future) will not result in adverse impacts to the community, such as fare increases or reductions in existing transit service or maintenance.

AK-5

Responses to Letter AK

AK-1

Comment noted that EPA has not identified environmental impacts requiring substantive changes to the SEIS/SEIR, but rather has identified areas for further clarification of environmental impacts and measures to minimize impacts. EPA has rated the SEIS/SEIR as *Lack of Objections*. SFMTA will continue the ongoing community outreach to incorporate community and business concerns in the planning process as the project moves forward.

AK-2

Construction of the Central Subway Project is estimated to begin in mid-to late 2010, following completion of the environmental review process in the summer of 2008, and final design and acquisition of right-of-way over the following two years. At present it is likely that the Altamont Land Disposal site would be use for disposal of spoils. The Contractor would be responsible for obtaining the necessary permits and approvals for the disposal of spoils over the three year excavation period.

The SEIS/SEIR Section 6.13 for Hazardous Materials describes the potential for hazardous materials to be present in soils that would be excavated. The preparation of a Site History Report, collection and analysis of soils samples, preparation of a Soils Analysis Report, and the development of a Site Mitigation Report would be required to comply with Article 20 of the San Francisco Municipal Code to protect workers, the public, and the environment. The Guidelines for the Management and Disposal of Excavated Soils is described on page 6-105 of the SEIS/SEIR, and includes soil stockpile sample collection and analytical requirement to meet landfill acceptance criteria.

If water generated from dewatering activities is to be discharged directly into the bay, a permit from the Regional Water Quality Control Board is required. If the water is to be discharged into the city's combined storm and sanitary sewer system, a Batch Industrial Wastewater Discharge Permit would be required from the San Francisco Public Utilities Commission, Bureau of Environmental Regulation and Management.

AK-3

Comment noted. Measures described in the SEIS/SEIR (pages 6-111 and 6-112) to control dust emissions during construction, and to reduce exhaust emissions from construction equipment will be part of the Mitigation Monitoring and Reporting Program and construction specifications. Because most of the Central Subway Project will be below surface streets and not in exposed areas of earth-disturbance,

the recommended mitigation measures for wind fencing and grading would not be applicable to this project.

The existing control measures on page 6-112 of the SEIS/SEIR have been modified to include EPA Air Quality measures.

The text in the third bullet on page 6-112 is revised as follows:

“The idling time of all construction equipment used at the site shall not exceed five minutes per hour. All equipment shall be properly tuned and maintained in accordance with the manufacturer’s specifications to perform at EPA certification levels at the manufacturer’s recommended frequency. Employ periodic, unscheduled inspections to limit unnecessary idling.”

The following measures are added following the final bullet, page 6-112:

- “Reduce use, trips, unnecessary idling from heavy equipment.
- Use EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter at construction sites.
- When hauling material and operating non-earthmoving equipment onsite, prevent spillage and limit speeds to 15 mph. Limit speed of earthmoving equipment to 10 mph.”

AK-4

SFMTA would act in accordance with the provisions of the Uniform Relocation Act and existing federal and state relocation and acquisition laws to minimize the impact on affected property owners, businesses and residents. In addition to these agency requirements, SFMTA is committed to working closely with the Chinatown community, and has retained the services of the Chinatown Community Development Center to assist in coordination and communication with residents and businesses along Stockton Street to ease disruption during relocation, where possible and maintain the historic neighborhood character and activities. SFMTA has identified the potential for transit-oriented development space at the proposed station sites to facilitate the inclusion of affordable housing and retail space in the structures to be designed and developed. SFMTA would be responsible for development of the stations to maintain the schedule for the Central Subway Project. The conditions of project approval by SFMTA, the Planning Commission, and the ROD by FTA will also include transit-oriented development for low income

housing and retail space. The RFP for station design will be issued in the Fall of 2009 during the next phase of project design development and would include independent environmental review, public review, and approval for any transit-oriented development above the station.

AK-5

The text in Section 8.1.4 has been revised to reflect the fact that the Locally Preferred Alternative, Alternative 3B, is fully funded.

Letter AL

December 7, 2007

Mr. Dwight S. Alexander, President
San Francisco Planning Commission
1650 Mission Street 4th Floor
San Francisco, CA 94103

Mr. Nathaniel Ford
Executive Director
San Francisco Municipal Transportation Agency
1 South Van Ness Avenue, 7th Floor
San Francisco, CA 94103

12/12
CARTER
PYE
NAT

Dear Mr. Alexander and Mr. Ford:

We the undersigned, representing the interests of various service agencies and organizations in the Chinese community have had an opportunity to review the Draft SEIR/SEIS (Report) on the Central Subway Project, and appreciate the opportunity to share with you our observations, comments and recommendations.

First of all, we would like to reiterate our strong support of the project, and see it as essential to the future social and economic vitality of the Chinatown Community. At the same time, we want to reiterate the absolute necessity for our continued inclusion and involvement in the decision making process, in light of the very serious project impacts, as well as the residential and commercial dislocation that may occur.

We concur wholeheartedly with the findings of the report in terms of the need for the project. We can anticipate that the engineering and construction challenges will be great, and that the overwhelming proportion of resources will be committed to addressing the "bricks and mortar" aspects of the project, but we believe that it is *equally important* for adequate resources to be allocated to address the social and economic impacts of this massive project.

We believe that the Report touches on most of the important issues or areas of concern that stem from the project, but we would like to take this opportunity to either expand on the areas of concern or point out where the Report is inadequate or lacking. The references to the Report and our comments follow:

Chapter 5 Environmental Consequences and Mitigation

Page 5-11 *"While the greatest impact on residents and businesses would occur in Chinatown, the number of relocations is not substantial and the community has expressed strong support for the project. The impact of these acquisitions would be mitigated through existing relocation assistance programs and through opportunities for developing replacement housing"*

AL-1

DEC 11 2007

We strongly support the project, but we do NOT concur with this statement and take issue with its faulty assumptions. The scarcity of affordable housing in San Francisco would render any residential relocation difficult at best, and when there may be as many as 17 households impacted, finding relocation housing that each household can afford will be extremely challenging. In addition, the relocation of businesses will not include any rent assistance for those businesses relocated, so each business will be faced with the challenge of re-building a business in unfamiliar surroundings while facing the double demands of increased rent and loss of cash flow from its former clientele. Furthermore, when all the businesses from half of a block face are eliminated, the relocation will have a rippling affect and will impact businesses for several blocks around the project site.

AL-2

For these reasons we strongly urge the project sponsor to do the following:

1. Ensure that adequate resources are made available for residential relocation;
2. Ensure that funding is acquired to build the appropriate number of units of replacement housing;
3. Provide rental or property leasing assistance to impacted businesses in addition to the relocation costs;
4. Conduct an economic analysis to determine the impact of the lost businesses and to develop the strategies for new economic development on the project site and in the project area, including the possible use of concourse retail space as well as multi-story commercial development.

Page 5-63 Discussion of the potential exposure of workers to hazardous materials.

We believe that this section is inadequate because it does not address the possible exposure to hazardous materials of those who live and work in the Chinatown Community. Report should detail the hazardous materials that may be used, emitted, or produced (solvents, emissions, corrosive and toxic materials, etc.) as well as the mitigation measures that will be employed to contain their impacts.

AL-3

Page 5-68 Discussion of air quality analysis.

We believe that this section is inadequate because there are no provisions for air quality analysis in the Chinatown area.

AL-4

Page 5-77 to 5-87 Discussion of noise and vibration issues along with standards and measures.

We believe that this section is inadequate because it merely assumes that noise and vibration levels will fall within acceptable standards, and does not provide any indication of how these standards will be monitored or enforced, and by whom, nor what measures would be taken if the standards are exceeded.

AL-5

Chapter 6 Construction Impacts and Mitigation

There are far too many areas where we have questions regarding the construction impacts of the project, so rather than cite each concern and repeat ourselves *ad nauseam*, we would like to just state some of the points that we believe should be included in the final Report. These include the following:

1. The discussion of construction methodology and impacts should include the anticipated truck routes that will be used for hauling away debris for each of the options;
2. The Report states that DPT will develop the detour routes for non-transit traffic, but it should include the requirement that DPT work in concert with the community businesses and organizations to develop this plan;
3. The detour maps contained in the appendix are difficult to read and in need of additional explanation; revised maps should be easily understood by the public;
4. The Report suggests that parking spaces lost as a result of construction will only be *temporary*; in fact, some of the parking spaces lost as a result of construction may be *permanently* lost;
5. The issue of settlement due to vibration or tunneling was discussed in a number of sections; this is an extremely important matter in our view, and must contain more specifics, especially in terms of creating a system or mechanism that has the ability to:
 - a. Monitor ground settlement;
 - b. Provide a channel for accepting and responding to complaints;
 - c. Perform timely inspections;
 - d. Schedule compensation grouting or other mitigation measures;
 - e. Accept, process, and adjudicate claims.
6. Specifics on who is responsible for enforcing the work practices (keeping equipment tuned, limiting idling times, limiting use of equipment, etc.) aimed at reducing noise, emissions and pollution should also be included.

General Comments on the Draft SEIR/SEIS

Property Acquisition

The Report identifies two locations as potential sites for the Chinatown Station – the Ning Yeung Association site (814-828 Stockton), and the Hogan and Vest site (933-949 Stockton).

Of these two sites, we feel that the Hogan and Vest site is more central, located closer to the heart of Chinatown, and in that respect, a superior location; this site may also lend

AL-6

AL-7

AL-8

AL-9

AL-10

AL-11

AL-12

itself to the addition of a second entry portal since it is a corner site; additionally, its size will allow greater flexibility for possible future development of replacement housing and commercial space, especially when cost feasibility is considered. On the other hand, it could contribute to more adverse construction impacts, especially on the Gordon J. Lau elementary school that borders the site, and it would also result in the displacement of 8 businesses and 17 affordable housing units, while the Ning Yeung site would result in less residential (2 units) and business (10 units) displacement.

While the Ning Yeung site will result in less displacement, it also has some limitations; because it is a mid-block site, the development of a second portal would require an entry on Hang Ah Alley, necessitating entry off of the main streets. Development on this site may also be more constrained due to its smaller footprint, as well as to provisions of the local ordinance that governs the shadowing impacts of this project on the Willie “Woo Woo” Wong Playground. Perhaps the biggest drawback of this site, however, is its location, which is further from the Chinatown core than the Hogan and Vest site.

Both sites, however, can present another whole set of challenges. The acquisition of private property in Chinatown can be very unpredictable, and since there aren’t any clear provisions for communicating with either property owner at this time, we cannot ascertain their willingness or unwillingness to sell.

In either case, without a willing seller, the SFMTA and the City and County of San Francisco may encounter major delays in the development process, even if eminent domain is exercised. This could adversely affect project costs in a very substantial way.

In light of the very tight project schedule that FTA expects SFMTA to adhere to, and with consideration that a contested acquisition may delay or even derail the project, it may make good sense for SFMTA to consider numerous alternative sites instead of locking on to one site.

It is our understanding that the key decision-makers and project staff had toured the community earlier, and had in fact looked at other sites. We strongly recommend that you continue to give consideration to evaluating these other sites as well.

Among these alternate sites, the North Ping Yuen site (880 Pacific) and the Central Ping Yuen site (795 Pacific), are sites that would avoid some of the potential pitfalls involved with private property acquisition; we therefore recommend that you look seriously at these two sites, especially the North Ping Yuen site.

The North Ping Yuen site includes an open area on the NW corner of Pacific Avenue and Cordelia Place that might lend itself to development of an entrance to the northern end of the proposed station, and may be the superior location within the entire Ping Yuen housing complex.

Since both sites are public property, the ability to negotiate the use of air rights, easements, or other rights of access and use may be more predictable. In addition, it

appears that little displacement of residents or businesses would be required. Locating the station in close proximity to the Ping Yuen housing developments may also have an added benefit of making transit use most convenient to those who are most transit-dependent. However, since there has been little discussion about the possibility of development on these sites with Ping Yuen residents, it is difficult to gauge their receptivity at this time. In short, we feel that avoiding a protracted acquisition process may ultimately enable better adherence to a demanding project schedule.

AL-12
Cont.

Regardless of the site that is ultimately selected, we believe that it is essential to fully explore the possibility of adding multiple entry portals to the selected site during the final design phase of the project in order to maximize the utility of the selected site.

AL-13

Environmental Justice Issues

The Report touched on the environmental justice issues that stem from this project, but it does not adequately address that issue. It is precisely because Chinatown is a community of many low-income residents and small businesses without the capital and financial support of a corporate structure that the impacts will be far greater than in a more affluent community.

For those reasons, we firmly believe that a comprehensive program of community mitigation measures and benefits should be an integral part of this project. We anticipate that at a minimum, this program must include the following elements or components:

1. Full relocation benefits for any residents and businesses displaced by the project, including rent assistance for displaced businesses;
2. The construction of 1 for 1 affordable replacement housing for any affordable housing stock eliminated because of the project;
3. The development of replacement retail space comparable or superior to that lost due to construction, the development of additional commercial space to promote economic vitality in the impacted area;
4. Employing the maximum level of community residents in all project and project-related employment opportunities;
5. The maximum use of community businesses and Chinese-American vendors and contractors in all project and project-related contracts;
6. Strong commitment to use and support community artists in the Public Arts program of the project;
7. A proactive program to address potential public health impacts associated with vermin infestation and migration;

AL-14

AL-15

AL-16

AL-17

AL-18

AL-19

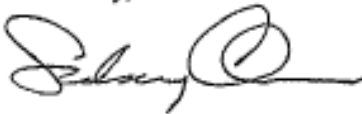
AL-20

- | | |
|---|-------|
| 8. Development of creative approaches to mitigate impacts, such as expanding the Park and Ride Shuttle, using area restaurants to feed workers, developing contingency measures to address loss of power, noise, dust, congestion, etc. | AL-21 |
| 9. A comprehensive bilingual public information and problem-solving program aimed at addressing the entire spectrum of concerns that may arise during the construction phase of the project. | AL-22 |
| 10. A well planned transition to new revenue service including the provision of adequate levels of surface transit along the corridor. | AL-23 |

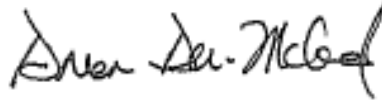
We would like to conclude our comments by once again voicing our strong support for the Central Subway project. At the same time, we believe that giving serious consideration to alternative sites, as well as developing a comprehensive plan to address project impacts will enhance the project's likelihood of success.

We look forward to working with you and your project staff on this very important project. Should you need to contact any of us at any time, our point of contact should be Mr. Gordon Chin, Director of the Chinatown Community Development Center (CCDC).

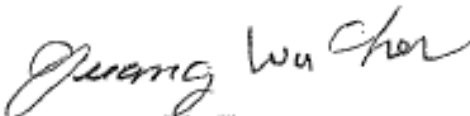
Sincerely,



Mr. Sidney Chan
President
Chinese Chamber of Commerce



Ms. Doreen Der-McCloud
Executive Director
Donaldina Cameron House



Mr. Guang Wu Chen
President
Ping Yuen Residents Improvement
Association



Mr. Yek Gu Zhong
Vice President
Community Tenants Association



Mr. Gordon Chin
Executive Director
Chinatown Community Development Center

Responses to Letter AL

AL-1

Comment of support for the project as essential to the future social and economic vitality of the Chinatown Community is noted. SFMTA is committed to continued inclusion and involvement of the Chinatown community in the design development and decision making process for the project. SFMTA has contracted with the Chinatown Community Development Community (CCDC) for assistance in public outreach to the Chinatown community during the environmental review process, and for assistance during project development to minimize impacts to property owners and tenants that would be impacted during construction or would be relocated for the transit-oriented station development.

AL-2

The statement from page 5-11 of the SEIS/SEIR is incorrect. Revised text is provided below to correct the statement.

As described on page 6-49 of the SEIS/SEIR, SFMTA would be required to develop a detailed Relocation Plan designed to minimize impacts to the businesses displaced by the project, including relocation assistance and payments. Each residential household and each business displaced by the Chinatown station will be relocated. Minimum relocation payments are set by law, and include moving expenses and search expense payments for businesses and referrals to comparable location for displaces. Mitigation measures described on page 6-53 state that redevelopment of affordable housing units on the Chinatown Station site above the station and ground floor retail, where it is compatible with station access, could further reduce the adverse impacts of displacement of existing residential units and small businesses in Chinatown. Relocation activities associated with the Locally Preferred Alternative (Alternative 3B) will begin as soon as the Final SEIS/SEIR is approved by the City and the Record of Decision is issued by FTA and the project is approved by SFMTA Board. The schedule shows over a year between project approval and the beginning of construction. The services of CCDC, as described in Response to Comment AL-1 above, will assist in communicating with neighborhood businesses and residents and in identifying potential properties within Chinatown for relocation opportunities for both residents and businesses. SFMTA real estate would be responsible for relocation.

The last two sentences, paragraph third paragraph, page 5-11 is revised as follows:

“While the greatest impact on businesses and residences would occur in Chinatown, ~~the number of relocations is not substantial and~~ the community has expressed strong support of the Project. The impact of these acquisitions would be mitigated through existing

relocation assistance programs and through opportunities for developing affordable housing on the Chinatown Station site.”

The following text is added to end of the fourth paragraph, page 6-54:

“MTA will provide rental or property leasing assistance to impacted businesses in addition to the relocation costs.”

AL-3

Section 5.10 of the SEIS/SEIR addresses hazardous materials from operation of the Central Subway Project and Section 6.13 address hazardous materials during construction of the project. Hazardous materials during operation would include the typical use, handling and storage of hazardous materials such as degreasers, lubricants, cleaning solutions, solvents, paints, and miscellaneous petroleum products used for maintenance activities. Use of these materials is heavily regulated by the State and by the City and will be included in routine inspections by SFMTA and the City Department of Public Health.

Section 6.13 (page 6-100 to 6-109) details the potential for encountering hazardous materials during construction and the required measures to minimize exposure by workers or the public. The Site Mitigation Report required by Article 20 of the San Francisco Municipal Code would include specific measures to be undertaken during construction to protect site workers, the public and the environment.

AL-4

The air quality analysis focused on the portion of the Central Subway Corridor that would be at the surface level and could affect traffic circulation and localized emissions on City streets. The Central Subway through Chinatown would be below ground where surface traffic and therefore air quality would not be affected. Measures to minimize dust during construction are described on page 6-111 and measures to minimize exhaust from construction equipment are described on page 6-112 of the SEIS/SEIR. These measures would apply to the Chinatown Station area.

AL-5

Similar to air quality impacts, impacts from noise and vibration are primarily related to the surface segments of the proposed project, not to the segment in deep tunnel (Chinatown). The majority of potential noise and vibration impacts in Chinatown would result from construction activities at the station location. Noise and vibration levels will need to meet the San Francisco Noise Ordinance Limits. Mitigation measure to minimize impacts are described on pages 6-117 and 6-118 of the SEIS/SEIR and include hiring an acoustical consultant to prepare a Noise and Vibration Control Plan that would identify

all potential impacts and would provide adequate control measures to demonstrate that the noise and vibration criteria and limits would be achieved. The Plan would include a noise monitoring plan that would specify monitoring locations, equipment, procedures and schedule of measurement, and reporting methods to be used. Monitoring Reports will be summarized and reported by SFMTA to the Citizens Advisory Group (CAG) for the Central Subway that includes Chinatown representatives. Monitoring reports will also be provided to the CCDC at project meetings.

In addition, construction noise and vibration mitigation is also part of the Mitigation Monitoring and Reporting Program, Appendix I.

AL-6

Page 6-11 states that Stockton Street would be used to access the station construction site for hauling materials, equipment, and spoils for the Chinatown Station. Preliminary truck routes for the hauling of debris have been developed since the publication of the Draft SEIS/SEIR. Text additions that describe the truck haul routes have been added to the SEIS/SEIR, page 6-16. These routes may be refined during the final design phase. During refinement of the construction detour routes, SFMTA will work with the Chinatown community and business organizations to ensure that neighborhood disruption is minimized.

The last paragraph, page 6-16 is revised as follows:

“Guideway excavation would proceed in a northerly direction from the portals south of Bryant Street towards Union Square. As guideway excavation proceeded, muck would be transported through the constructed portions of the guideway to each portal before being hauled off-site for permanent disposal. The south portal on Fourth Street would be the primary truck loading site. Trucks carrying materials from the portal site would be routed directly to the I-80 freeway for disposal sites to be determined by the contractor. Truck travelling east on I-80 would travel south on Fourth Street, west on Brannan Street, and north on Fifth Street to the I-80 eastbound on-ramp. Trucks travelling westbound on I-80 (southbound) would travel south on Fourth Street, east on Brannan Street, north on Third Street, and west on Harrison Street to the I-80 westbound on-ramp. The southbound trucks from the Third Street portal would follow this same route. The trucks from the Third Street portal going east on I-80 would continue west on Harrison Street, turning south on Fifth Street to the I-80 eastbound on-ramp.

Spoils from excavation of the Chinatown Station, the crossover cavern and the tail track tunnels would be removed by way of the Chinatown Station access shaft and hauled off-

site for disposal. Trucks from Chinatown would travel on Stockton Street to eastbound Broadway, south on Battery Street, and continuing south on First Street to the I-80 eastbound freeway-ramp or continuing west on Harrison Street to the I-80 westbound on ramp.

Spoils generated from excavation of the Union Square Station and the guideway tunnels north of Union Square would be hauled to the surface at Union Square and hauled off-site for disposal. Trucks from the Union Square Station construction site would travel south on Stockton Street continuing on Fourth Street to the I-80 eastbound on-ramp or turning west on Harrison Street and south on Fifth Street to the I-80 eastbound on-ramp.

Spoils generated from excavation of Market Street Station and Moscone Station would be hauled to the surface at Stevenson and Clementina Streets, respectively, before being hauled off-site for permanent disposal. An estimated 524,000 cubic yards of spoils would be disposed of for Alternative 2, resulting in approximately 8 truck trips per day during the 4.5 year construction for the guideway and 8 to 10 daily truck trips from each station during the station excavation periods. Trucks from the Moscone and Market Street Stations construction sites would travel south on Fourth Street to the I-80 eastbound on-ramp or take Fourth Street, west on Harrison, and south on Fifth Street to the I-80 westbound on-ramp.

The following text is added as a new paragraph following the first paragraph, page 6-25:

“The south portal on Fourth Street would be the primary truck loading site. Trucks carrying materials from the portal site would be routed directly to the I-80 freeway for disposal sites to be determined by the contractor. Trucks travelling east on I-80 would travel south on Fourth Street, west on Brannan Street, and north on Fifth Street to the I-80 eastbound on-ramp. Trucks travelling westbound on I-80 (southbound) would travel south on Fourth Street, east on Brannan Street, north on Third Street, and west on Harrison Street to the I-80 westbound on-ramp. Trucks from the from the Moscone Street Station construction site would travel south on Fourth Street to the I-80 eastbound on-ramp or continue west on Harrison Street and south on Fifth Street to the I-80 westbound on-ramp. Trucks from the Union Square/Market Street Station construction site would travel south on Fourth Street then follow the same route south as the trucks from the Moscone Station. Trucks from Chinatown would travel on Stockton Street to eastbound Broadway, south on Battery Street, and continuing south on First Street to the

I-80 eastbound freeway-ramp or continuing west on Harrison Street to the I-80 westbound on ramp.

The following text is added as a new paragraph following the second paragraph, page 6-25:

“Eastbound trucks hauling debris from the TBM extraction pit would go southeast on Columbus Avenue, east on Washington Street, south on Battery Street, and continue south on First Street to the I-80 eastbound on-ramp. Southbound trucks would follow the same route continuing west on Harrison Street to the I-80 westbound on-ramp.”

The following text is added as a new paragraph following the third paragraph, page 6-32:

“The haul routes for the portal and the station construction sites would be the same as described for Alternative 3A.”

AL-7

DPT and SFMTA will work with the Chinatown community to develop the final detour routes for surface traffic. Page 6-37 describes that the detour routes in the appendix are potential detours. Prior to final design, the SFMTA would select the most appropriate detour routes and develop temporary Transportation System Management (TSM) measures along these routes. Detour routes would be advertised prior to construction in the local media. Traffic control police would monitor critical locations along the detours and would report traffic issues to DPT and SFMTA for corrective action.

The second sentence, paragraph six, page 6-37 is revised as follows:

“Prior to final design, the MTA would select the most appropriate detour routes, working in cooperation with community and business organizations, and develop temporary transportation system management measures along these routes, e.g. additions of turn lanes at key intersections, conversion of parking lanes into peak period travel lanes, etc.”

AL-8

The Temporary Construction Detours in the Chinatown station area show traffic being detoured from Stockton Street between Clay and Washington Streets, to Kearny Street with access via Clay or Washington Streets.

AL-9

The loss of parking spaces associated with the operation of the Central Subway is documented in Section 3.2.4, pages 3-58 through 3-64. Text is added in Section 6.3.4 to clarify where the permanent loss of parking is discussed. Of the 44 spaces along Stockton Street between Clay and Jackson Streets, 38 spaces would be retained and 6 spaces would be lost over the long term for Alternative 3B to provide space for the station emergency hatch. All parking spaces would be lost during construction because of truck access during the 54 months of station construction.

The following text is added following the second sentence, first paragraph, page 6-41:

“Therefore, substantial curb parking areas would be temporarily removed during construction, placing higher parking demands upstream and downstream of the construction zone, and on nearby streets. Parking spaces that would be permanently lost as a result of the Central Subway Project are discussed in Section 3.2.4.”

AL-10

Site-specific designs to limit potential construction related settlements will be addressed during the next phase of project development for the adopted alternative and will include: detailed evaluations of the site-specific geotechnical properties of the subsurface materials; building-by-building evaluations of foundations that may be affected by excavation; special excavation shoring designs; and other measures designed to avoid or minimize the potential adverse effects of settlement. The geotechnical design of the excavations will consider site preparation and excavation and support using concrete diaphragm walls, or similar technology designed to minimize potential construction related settlements resulting from unstable soft sediments. With a rigorous geomechanical instrumentation program accompanying the excavation, ground movement will be monitored before settlement propagates to the surface. If advance settlement trends are observed, grouting or underpinning can be employed to arrest the ground movement before surface structures are affected. (pages 6-91 and 6-92 of the SEIS/SEIR)

Construction activities and monitoring results will be shared with the Citizens Advisory Group (CAG) and with the businesses and residents along the Central Subway corridor via newsletters and the Central Subway website. An active Public Outreach Program and coordinated project information with CCDC in Chinatown during construction will provide a channel of accepting and responding to issues from businesses or residents affected by construction.

AL-11

A Mitigation Monitoring and Reporting Program (MMRP) has been added to the Final SEIS/SEIR as Appendix I that places the responsibility for monitoring and reporting conditions during construction on an independent construction monitor who will report directly to the City (both SFMTA and MEA). The conditions of project approvals and thresholds of significance described in the environmental documents establish the limits for construction operations and will be strictly enforced. Construction work can be halted if violations are reported. The MMRP specifies impact thresholds, mitigation measures, and compliance responsibilities for each environmental topic addressed in the SEIS/SEIR.

AL-12

The station selection process is described in Section 2.4.4 Screening of Design Options/Alternatives Not Carried Forward, on page 2-58 to 2-62 of the SEIS/SEIR. Consideration of station locations outside the project study area (Jackson Street is the northern project limit established as part of the Third Street Light Rail planning process) would reopen the environmental process to allow public input and consideration of all feasible alternatives beyond Jackson Street for a station in Chinatown. Further, the Ping Yuen site has been turned over from HUD to the Redevelopment Agency, and would require approval by residents of the housing units to be considered for station development. Development of the Ping Yuen site would impact the existing residents and would present substantial construction access challenges for equipment and haul trucks. Historic buildings surrounding this site would require evaluation. Delays resulting from recirculating the environmental document to further evaluate a station at this location would also be substantial (estimated to be 12-16 months). SFMTA would begin the notification to property owners and the property acquisition process immediately after the project approval and Record of Decision in the fall of 2008.

AL-13

Additional entries to the Chinatown Station may be considered during the next phase of design development. A station entry on the east side of Stockton Street may also be considered. Independent environmental review of an additional entry to the Chinatown Station would be required as an Addendum or second Supplement to this SEIS/SEIR.

AL-14

See Response to Comment AL-2 for discussion related to relocation of businesses and residents in Chinatown.

Section 5.2.3 Environmental Justice Findings describes that almost the entire Central Subway Corridor traverses low-income and minority neighborhoods, and that implementation of the project would include direct mobility benefits to all of these neighborhoods that are expected to be equitably shared across communities by various demographic groups.

AL-15

The transit-oriented development above either of the proposed Chinatown Station sites could include development of low-income housing units that would increase the number of housing units in Chinatown.

AL-16

The Uniform Relocation Act and State of California Relocation Act contain specific requirements that govern the manner in which a government entity can acquire property for public use and the relocation of displaced businesses or residential units. The Central Subway would follow these official procedures for the displaced businesses and residential units. Relocation of displaced businesses to comparable space in the Chinatown neighborhood will be the objective of SFMTA, working closely with the CCDC and Chinatown community. Development of retail space and commercial space in the transit-oriented Chinatown station will be part of final design and will also be developed in close cooperation with the Chinatown community.

AL-17

SFMTA will make every effort to offer employment opportunities to Chinatown residents through an aggressive public outreach program in both English and Chinese languages. CCDC will assist in this outreach and communication with Chinatown residents and businesses.

AL-18

Similar to the Response to Comment AL-17 above, SFMTA will make information regarding contracting and vending opportunities directly related to the Central Subway construction readily available to businesses in Chinatown. Indirect benefits may result during the 5 to 6 year construction process with workers using neighborhood restaurants and businesses. Alternative 3B is expected to cost an estimated \$188 million for professional services and labor and approximately \$1,026 million for material/facilities.

AL-19

SFMTA has been coordinating with the San Francisco Public Arts Program since mid-2007 during the conceptual design development of the Central Subway Project. Opportunities for local artists will be made available through the Public Arts Program. The capital costs for the project (Section 8.0 Financial

Feasibility, page 8-3) identifies that 2 percent of the station construction costs is included for the provision of public art at each of the stations, as required by the San Francisco public arts policy.

AL-20

Vermin infestation and migration from construction of the Central Subway Project was not assessed as part of the SEIS/SEIR, but would be coordinated with the Department of Public Health as part of the construction permit using standard City practices.

AL-21

The Mitigation Monitoring and Reporting Program addresses the full range of impacts identified for construction and operation of the Central Subway Project described in the SEIS/SEIR.

AL-22

The Public Outreach Program established by SFMTA early in the development of the Central Subway Project in 2005 has included bilingual information and communication to enhance communication with the Chinatown community. CCDC services were retained by the project in 2007 to assist SFMTA in the communication and outreach with Chinatown businesses and residents. Newsletters and informational flyers are in both English and Chinese. Representatives from Chinatown sit on the Citizens Advisory Group (CAG) and receive timely updates on the project.

AL-23

A well-planned transition to new revenue service at the time the Central Subway opens will be a vital part of project planning. Existing transit (Muni 30, 45, and 9X lines) along Stockton Street will continue for local trips even after the Central Subway service is initiated.

Letter AM



METROPOLITAN
TRANSPORTATION
COMMISSION

Joseph P. Boer MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
TEL 510.817.5700
TTY/TEO 510.817.5769
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December 6, 2007

RW Dool, Chair
Napa County and Cities

Scott Haggerty, Vice Chair
Alameda County

Tim Alvarado
City and County of San Francisco

Tom Alvarado
U.S. Department of Housing
and Urban Development

Tom Bates
Cities of Sonoma County

Rob Wenzel
Sonoma County and Cities

Dave J. Cho
Cities of Santa Clara County

Doree Carter
Association of Bay Area Governments

Doreen M. Giampini
U.S. Department of Transportation

Fidelis D. Gibert
Contra Costa County

Steve W. Helwig
San Francisco Bay Conservation
and Development Commission

Steve Kinsey
Marin County and Cities

Steve Lavigne
Cities of San Mateo County

Jon Rubin
San Francisco Mayor's Appointee

Ryan Scripf
San Francisco, Transportation
and Housing Agency

James P. Spring
Solano County and Cities

Ardenia J. Taylor
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Andy Warth
Cities of Contra Costa County

Ken Yeager
Santa Clara County

Steve Hessinger
Executive Director

Ann Fleming
Deputy Executive Director, Operations

Andrew B. Frenette
Deputy Executive Director,
Bay Area Toll Authority

Theresa W. McMillen
Deputy Executive Director, Policy

Nathaniel Ford
Executive Director
San Francisco Municipal Transportation Agency
1 South Van Ness Avenue, Floor 3
San Francisco, CA 94103-1267

Dear Mr. Ford,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement/Supplemental Environmental Report (SEIS/SEIR) for the Central Subway project (Phase 2 of the Third Street Light Rail project). MTC recognizes the importance of the Central Subway project in providing congestion relief and improved transit service in the heavily traveled Chinatown to South of Market corridor.

MTC Resolution 3434, the Regional Transit Expansion Program, identified the Central Subway project as a regional priority for federal New Starts funding. MTC is currently developing a strategic plan for Resolution 3434 and looks forward to working with SFMTA and sponsors throughout the region on delivering projects in the program.

Additionally, in June of 2007, MTC approved a framework to distribute some \$347 million in state transit capital bond funds that come to MTC for distribution in the Bay Area. Included in this policy framework — set forth in MTC Resolution 3814 — was a commitment to provide \$100 million to the Central Subway project. Further bolstering the project, SFMTA agreed to match this amount with \$100 million in state funds that are awarded directly to it. This \$200 million infusion is a critical element toward full funding for the Central Subway project.

We look forward to working with you to complete the Central Subway project for the benefit of San Franciscans as well as visitors from throughout the region and around the world.

Sincerely,

Steve Heminger
Executive Director

cc: Commissioner Tom Ammiano
Commissioner Jon Rubin

J:\PROJECT\Resolution 3434\2008 Strategic Plan\Central subway SEIR-EIS letter.doc

AM-1

Responses to Letter AM

AM-1

Comments recognizing the importance of the Central Subway Project in providing congestion relief and improved transit service in the Chinatown to South of Market Corridor and the recent allocation of funds by Metropolitan Transportation Commission (MTC) are noted.

Letter AN



"Miller, Jr., J. Gregg "
<gregg.miller@pillsburylaw.com>
12/19/2007 02:04 PM

To bill.wycko@sfgov.org
cc
bcc
Subject Central Subway DEIR Comments

Bill: attached are comments to the Central Subway DEIR. I understand that the public comment period close December 10, 2007, and therefore, these comments are late. However, I hope that MEA will nevertheless consider the comments and address them in the comments and responses to the DEIR. Thanks,

Gregg

J. Gregg Miller, Jr. | Pillsbury Winthrop Shaw Pittman LLP

Direct Dial: 415.983.1557 | Fax: 415.983.1200
50 Fremont Street | San Francisco, CA 94105-2228

Email: gregg.miller@pillsburylaw.com
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December 19, 2007

J. Gregg Miller, Jr.
Phone: 415.983.1557
gregg.miller@pillsburylaw.com

Mr. Bill Wycko
Central Subway EIR Coordinator
Acting Environmental Review Office
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Re: Central Subway – Draft Environmental Impact Report, (the “DEIR”)

Dear Mr. Wycko:

Pursuant to the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code, we provide the following comments to the DEIR.

The below comments refer to Option 3B:

I. Request that the Portal Extents Be Moved South –

The portal extents (including vehicle attenuators) should be moved south to approximately 50'-0" from the north side of the overhead freeway (I-80) at Fourth Street under the I-80 freeway between Stillman and Perry Streets.

AN-1

II. Request Additional Acoustic Mitigation –

The exterior acoustic attenuator panels, at the inside walls of the concrete portal walls and inner ceiling, where the proposed light-rail train heads under ground (under I-80 at Fourth Street) should include additional acoustic mitigation. The acoustic mitigation should be implemented at the entrance, exit, and surrounding area of the proposed portal to mitigate noise created from use of the portal entrance and exit.

AN-2


700915608v1

Mr. Bill Wycko
December 19, 2007
Page 2

In summary, we respectfully request the Central Subway EIR address the above comments regarding the southward movement of the 4th Street at Stillman portal and additional acoustic mitigation.

Thank you for your consideration.

Very truly yours,



J. Gregg Miller Jr.

Responses to Letter AN

AN-1

The north end of the portal has been moved to south of Perry Street to accommodate the turn movements of Golden Gate buses into Perry Street. The location is approximately 50 feet south of the north edge of the I-80 freeway. The crash barrier would be positioned to the north, about 25 feet south of the north edge of the freeway, but bus access to Perry Street would still be possible without interfering with the turning radius of the bus.

AN-2

The portal would be designed to meet the requirements of the San Francisco Noise Ordinance. The impact of the project in the vicinity of the portal would be affected by the ambient traffic noise levels, which are higher than other locations along the corridor due to the freeway noise. It is projected that traffic noise levels in the vicinity of the portal (measured at the Avalon Yerba Buena Apartments at Fourth and Harrison Streets) would be about 78 dBA, which is less than one decibel level higher than the current level. The potential LRT operation along Fourth Street would be 61 to 62 dBA (day/night noise level) and approximately 4 to 6 dBA higher at the tunnel portal. Existing noise levels at this location are currently higher than the projected noise level associated with the operation of the transit project.

COMMENTS RECEIVED AFTER THE CLOSE OF COMMENT PERIOD

駐美台山寧陽總會館
**HOY - SUN NING YUNG BENEVOLENT ASSOCIATION
IN AMERICA**

41 WAVERLY PLACE
SAN FRANCISCO, CALIFORNIA 94108 U.S.A.
TEL: (415) 288-0605, 288-0603 FAX: (415) 982-3808

May 15, 2008

Municipal Transportation Agency (MTA)
Attn: Mr. John O. Funghi, P.E.
Project Manager
One South Van Ness Ave., Third Floor
San Francisco, CA 94108

Re: Central Subway Project SEIS/SEIR Draft
October 2007

Dear Mr. Funghi,


My name is John Tsang, vice president of the Hoy-Sun Ning Yung Benevolent Association (HSNYBA), owner of Assessor's Parcel #0225-014 (814 - 828 Stockton Street).

As vice president and member of the board of directors of HSNYBA, I have comprehensive knowledge of the above Assessor Parcel property. The aforementioned property's tenants composed entirely of retail/commercial usage, with no residential tenants in contradiction to the SEIS/SEIR Draft report.

Please be advised of the above information and revise your SEIS/SEIR Draft accordingly.

Sincerely,

HOY-SUN NING YUNG BENEVOLENT ASSOCIATION


John Tsang,
Vice President

cc: Arnold Lee, President
Board of Directors

AO-1

Responses to Letter AO

AO-1

Comment Noted. The language in the SEIS/SEIR is amended to reflect that 814-828 Stockton Street is a solely commercial property with no residential units as noted below.

The Socioeconomic (Population and Housing) Impacts and Mitigation Measures identified for Alternatives 2 and 3B in Table S-7, page S-21 and in Table 7-2, page 7-19 are revised as follows:

Environmental Area/Impacts	Alternative 2 – EIS/EIR Enhanced Alignment	Alternative 3A – Fourth/Stockton Alignment Option A	Alternative 3B – Fourth/Stockton Alignment Option B
<p>SOCIOECONOMIC (Population and Housing) Operation/Cumulative</p>	<p><u>Significant Impacts:</u> Acquisition of one parcel for the Chinatown Station would cause the displacement of 10 small businesses and one or two residential units in a predominantly minority and low income neighborhood.</p> <p><u>Mitigation Measures:</u> Redevelop the Chinatown Station site with affordable housing units above the station and ground floor retail where possible.</p> <p><u>Significant environmental effects which can not be avoided:</u> The construction of new affordable housing units/ground floor retail would not mitigate to a less-than-significant level the disruption to existing residents and small businesses associated with the temporary dislocation as new units are constructed.</p>	<p><u>Significant Impacts:</u> Same as Alternative 2.</p> <p><u>Mitigation Measures:</u> Same as Alternative 2.</p> <p><u>Significant environmental effects which can not be avoided:</u> Same as Alternative 2.</p>	<p><u>Significant Impacts:</u> Acquisition of one parcel for the Chinatown Station would cause the displacement of 8 small businesses and 17 residential units in a predominantly minority and low income neighborhood.</p> <p><u>Mitigation Measures:</u> Same as Alternative 2.</p> <p><u>Significant environmental effects which can not be avoided:</u> Same as Alternative 2, <u>except the loss of affordable housing would not mitigate to a less-than significant level the disruption to existing residents as well as businesses.</u></p>

The first sentence, third paragraph, page 2-19 is revised as follows:

“Construction of the station entrance would require acquisition of the parcel and relocation of ten businesses ~~and one to two residential units over the businesses.~~”

The sixth sentence, third paragraph, page 2-31 is revised as follows:

“Construction of the station entrance would require acquisition of the parcel and relocation of 10 businesses ~~and one to two residential units above the businesses.~~”

The third and fourth sentences, second paragraph, page 5-11 are revised as follows:

“Each of the Build Alternatives would displace ~~residential dwellings and~~ small businesses and Alternative 3B would displace residential units in the predominantly minority and low-income Chinatown District. To mitigate these impacts, it is recommended that redevelopment on the station sites incorporate affordable housing and ground floor retail where possible.”

The fourth sentence, third paragraph, page 6-51 is revised as follows:

“This displacement would require the relocation of five small businesses along Stockton Street and five small businesses along Hang Ah Alley with an estimated fewer than 10 employees each ~~and one to two residential units in the second floor of the building.~~”

The second paragraph, page 6-52 is revised as follows:

“No mitigation measures would be required beyond compliance with the Uniform Relocation Act and eminent domain law; however, development of affordable housing units on the Chinatown Station site above the station and ground floor retail where it is compatible with station access could further reduce the adverse impacts of displacement of existing ~~residential units and~~ small businesses in Chinatown.”

The last two sentences, fourth paragraph, page 6-52 is revised as follows:

“The Stockton Street parcel acquisition would require the relocation of 10 small Chinatown businesses ~~and one to two residential uses above the businesses. The residential displacement would likely displace affordable housing units and would result in adverse impacts to low income residents.~~”

The first sentence, fourth paragraph, page 7-47 is revised as follows:

“Alternatives 2 and 3A would result in the displacement of 10 small businesses (10 or fewer employees per business) ~~and 1 or 2 residential units~~ in the Chinatown neighborhood at 814-828 Stockton Street for construction of the proposed Chinatown Station.”

The sixth sentence, first paragraph, page 9-7 is revised as follows:

“The Enhanced EIS/EIR Alignment would require the displacement of 10 small businesses ~~and one to two residential units~~ in Chinatown for the station construction.

The second sentence, third paragraph, page 9-8 is revised as follows:

This Alternative would displace one business to accommodate the Moscone Station construction and 10 small businesses ~~and one to two residential units~~ to accommodate the Chinatown station.

4.0 PUBLIC HEARING COMMENTS AND RESPONSES

This chapter includes a copy of the public transcript taken at the November 15, 2007 Planning Commission hearing on the Draft SEIS/SEIR for the Central Subway. Each person providing testimony is identified by name and a number has been assigned to each substantive comment. The transcript of the public hearing is followed by the response section; which identifies each speaker and the response to each of the speaker's comments immediately follows.

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

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PUBLIC HEARING ON THE DRAFT SUPPLEMENTAL
ENVIRONMENTAL IMPACT REPORT FOR THE

CENTRAL SUBWAY PROJECT (PHASE 2-THIRD STREET LIGHT RAIL)

THURSDAY, NOVEMBER 15, 2007

SAN FRANCISCO PLANNING COMMISSION
SAN FRANCISCO CITY HALL
ONE DOCTOR CARLTON B. GOODLETT PLACE
COMMISSION CHAMBERS, ROOM 400
SAN FRANCISCO, CALIFORNIA

Reported by: Valerie E. Jensen, CSR No. 4401

Page 1

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

JAN BROWN & ASSOCIATES

24 CERTIFIED SHORTHAND REPORTERS

701 Battery Street, 3rd Floor

25 San Francisco, California 94111

(415) 981-3498

1

1 APPEARANCES

2

3 SAN FRANCISCO PLANNING COMMISSION:

4 President Dwight S. Alexander

5 Vice-President Christina R. Olague

6 Commissioners Michael J. Antonini, M. Sue Lee,
William L. Lee and Hisashi Sugaya

7

Commission Secretary Linda D. Avery

8

9

10 ALSO PRESENT:

11 Delvin Washington, Senior Planner

12 Lawrence B. Badiner, Zoning Administrator

13 Joan A. Kugler, San Francisco Planning Department

14

15

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Page 2

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

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NOVEMBER 15, 2007

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PROCEEDINGS

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COMMISSION SECRETARY AVERY: Commissioners,

6

you are now on Item Number 15, Case Number 1996.28IE,

7

Central Subway Project (Phase Two - Third Street Light

8

Rail).

9

MS. KUGLER: Good afternoon, President

10

Alexander, members of the Commission. Joan Kugler,

11

Planning Department environmental staff.

12

This item is a hearing to receive

13

comments from the public and the Commission on the

14

Draft Supplemental EIS/Supplemental EIR for the Central

15

Subway, which is the second phase of the Third Street

16

Light Rail Project. The original EIS/EIR for both

Page 3

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

17 phases of the Third Street Light Rail Project was

18 certified in 1998.

19 On November 1 the project director for

20 San Francisco MTA, John Funghi, gave an informational

21 presentation on the Central Subway Project to your

22 Commission which -- in which he detailed the three

23 alternatives.

24 Staff is not here to answer any questions

25 that are raised today. All comments received today

3

□

1 will be transcribed by our court reporter, and these

2 comments, as well as those that are received in writing,

3 will be responded to in a Comments and Responses chapter

4 in the final document.

5 Comments today should be focused on the

6 accuracy and adequacy of the information provided in

7 the Draft SEIS/SEIR. There will be no decision today

8 to approve or disapprove of the project. That decision

9 would not occur until after the environmental document

10 is certified.

11 The Landmarks Preservation Board held a

12 hearing on the document on November 7 and will be

13 submitting a letter of comment to the environmental

Page 4

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

14 review officer.

15 The draft document was advertised and
16 released for public comments on October 17, and the
17 comment period will end on Monday, December 10. The
18 ERO must receive all written comments by the close of
19 business on December 10.

20 As all comments today will be transcribed,
21 we ask that commenters speak slowly and clearly, so
22 that an accurate transcript of your comments may be
23 produced. Also, we ask that you state your name
24 and fill out a speaker card, so a copy of the Comments
25 and Responses can be mailed to you once it's completed.

4

1 This concludes my presentation. And unless
2 any of the commission members have questions, I would
3 respectfully request that the public hearing on the
4 Draft Supplemental SEIS/SEIR be opened.

5 Thank you.

6 PRESIDENT ALEXANDER: Thank you.

7 We'll now open the public hearing for the
8 Draft EIR on the Central Subway Project.

9 Can I have speaker cards?

10 Wells Whitney, followed by Marve Kasoff and

Page 5

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

11 Claudine Cheng.

12 MR. WHITNEY: Thank you, Commissioners. I'm

13 Wells Whitney.

14 COMMISSION SECRETARY AVERY: Excuse me,

15 Mr. Whitney.

16 The President has indicated that each speaker
17 would have two minutes. There's a lot of speaker cards.

18 So everybody gets two minutes to speak.

19 Thank you.

20 MR. WHITNEY: Wells Whitney, 1308 Montgomery

21 Street in North Beach on Telegraph Hill. I'm chair of

22 Renew SF, and I'm also representing Claudine Cheng and

23 Marve Kasoff and Rod Filar (ph) and Smith, who are also

24 on our board.

25 We're a neighborhood association in North

5

1 Beach, and we have a study going on now, funded by

2 Caltrans, studying all of Columbus Avenue in terms of

3 a planning effort. So, we've met several times with

4 the MTA team that's doing the subway, and we're quite

5 familiar with the work and the EIR. And I'd like to

6 speak, on behalf of myself as a citizen and of Renew SF,

7 in support of the EIR.

Page 6

PH-1

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

8 Thank you.

9 PRESIDENT ALEXANDER: Thank you.

10 Tony Gantner?

11 MR. GANTNER: Commissioners, Tony Gantner,
12 North Beach Merchants Association.

13 We support the Central Subway Project.

14 Currently, there are four stations planned, the last
15 in Chinatown, with the removal of the boring equipment
16 as I understand it, at Washington Square. Given the
17 major impact such equipment removal will create, we
18 would like to suggest that, as part of such removal,
19 that site be configured as much as possible so as to
20 provide a fifth station, either at Union and Columbus or
21 Columbus and Stockton, constructed as soon as possible
22 after completion of this next phase through Chinatown.

23 We also ask that, in removing the underground
24 equipment, that the use and enjoyment of Washington
25 Square Park not be disrupted nor allow any damage to

6

1 the park itself. We look forward to the further
2 integration of Chinatown, North Beach and Fisherman's
3 Wharf through redesign of our major corridors --
4 Broadway, Columbus and Stockton. The Central Subway

Page 7

PH-2

PH-3

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

5 will further that goal.

6 Thank you very much.

7 PRESIDENT ALEXANDER: Thank you.

8 Diana Pang, followed by Stephen Taber and

9 David Chiu.

10 Diana Pang?

11 Stephen Taber?

12 MR. TABER: My name is Stephen Taber. I

13 live at 1805 Page Street, and I'm on the Board of

14 Directors of San Francisco Planning and Urban Research

15 Association, and I am representing SPUR here today.

16 SPUR is very favorable towards this project and is a

17 big supporter of it.

18 This is a legacy project for San Francisco.

19 And I mean by that that it will benefit this city

20 city-wide as part of a transportation network for

21 generations to come. If you've been to London and

22 ridden on the underground there, you know that there

23 are stations and tunnels built in the 1860's that are

24 still in active operation.

25 We hope that this, as part of our Central

7

1 Subway system in San Francisco, will provide a similar

Page 8

PH-3
Cont.

PH-4

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

2 legacy, but in order to do that, it has to be planned
3 correctly and diligently. We believe that this
4 Environmental Impact Report is a very good step in the
5 way towards solving some of the problems, refining the
6 design and making this a much better system.

PH-4
Cont.

7 We emphasize that there are two or three
8 things that should be taken into account and, perhaps,
9 as the project progresses, studied in greater detail.

10 One is the transferability between transit lines --
11 both underground and surface transit lines. And
12 particularly at the Powell Street, slash, Union Square
13 station and at the Chinatown station there needs to be
14 very quick and easy transfer between the Number 1 line
15 and the Central Subway at Chinatown and the Market
16 Street Subway and the Central Subway. This is a problem
17 that still exists and needs to continue to be worked on.

PH-5

18 Secondly, we have to make sure that this
19 system has adequate capacity. And we are concerned
20 about the length of stations, making sure that the
21 length of trains that would be served will be adequate
22 in the future.

PH-6

23 PRESIDENT ALEXANDER: Thank you.

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

24 MR. GANTNER: Thank you.

25 PRESIDENT ALEXANDER: David Chiu, followed
8

1 by Chris Durazon and Marlene Tran.

2 MR. CHIU: Good afternoon, Commissioners.

3 My name is David Chiu. I'm a member of the Small

4 Business Commission. I also sit on the Community

5 Advisory Group of the Central Subway.

6 First of all, I'm here to really applaud

7 staff for doing an outstanding job with the Draft

8 SEIS/SEIR. Obviously, that's a huge document. It

9 really translates and captures the complexity of this

10 very important project.

11 I'm here to comment on a couple aspects of

12 this document with regards to the small business and

13 merchant community. First of all, I want to state

14 that the small business community and merchant community

15 is really looking forward to this project. After the

16 1989 earthquake, when the freeway came down, obviously,

17 transit was affected into Chinatown. This project will

18 really assist in moving that forward.

19 That being said, there are two aspects

20 of the document that I would like to suggest some

PH-7

PH-8

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project
21 additions around the construction impact on the
22 merchant community. First is on those businesses that
23 are potentially displaced. Fortunately, there are not a
24 lot of them, but it would be helpful to have a little
25 more detail in the report to talk about what relocation

9

□

1 might entail, given that, with many small businesses,
2 location is everything and it's not that easy, when
3 you have a business with a multi-year lease, to consider
4 how long that relocation may take. So, adding some
5 additional plans with regard to that, I think, would be
6 helpful in Section 6.0 of the report.

7 Secondly, again in the same section, 6.3,
8 there are details around mitigation impact on transit
9 and traffic. In other words, what is going to happen
10 during the six-year construction period of this project.
11 And I think we need to have more detail about how
12 transit routes will be affected, what's going to happen
13 with traffic in that area.

14 With that, thank you very much.

15 PRESIDENT ALEXANDER: Thank you.

16 Chris Durazon?

17 Marlene Tran?

PH-8
Cont.

PH-9

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

18 MS. TRAN: Good afternoon, Commissioners.

19 I'm Marlene Tran, a resident of Visitacion Valley,

20 spokesperson for Visitacion Valley Agents Alliance.

21 I'm here to give support to the Central Subway

22 connection to Chinatown because of its crucial link

23 for many residents between Visitacion Valley and our

24 neighboring communities. I am familiar with this need

25 because I've been a Muni rider for 40-plus years and

10

1 have advocated for the transportation needs of

2 thousands of my English-as-a-second-language students

3 throughout my 35 years of teaching immigrant students at

4 San Francisco City College. I want to emphasize that,

5 while we support this vital connection, our Visitacion

6 Valley residents want to maintain our current 9X Express

7 lines and buses that we have fought for for more than 13

8 years.

9 So, at a later date, I would like to

10 address the issue of passenger safety and language

11 access. This is one -- these are the issues I've been

12 talking for many, many years.

13 And in consideration of the many speakers

14 who are here, I just want to say that we certainly want

PH-10

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project
15 to support the Central Subway, but we want to maintain
16 the bus lines that we currently have in Visitacion
17 Valley.

PH-10
Cont.

18 Thank you.

19 PRESIDENT ALEXANDER: Thank you.

20 Bonnie Shiu?

21 MS. SHIU: Good afternoon, Commissioners.

22 I'm Bonnie Shiu, a community organizer with Visitacion
23 Valley Parent Association. I work with over 200 parents
24 and their families residing in the southeast part of
25 San Francisco. These families count on reliable public

11

] 1 transportation to bring them to downtown and Chinatown
2 on a daily basis. These working-class families often
3 include three generations within a household, and Muni
4 is the only means for parents to bring their children to
5 and from childcare, for youth to get to schools and for
6 seniors to get out to their doctor's office and receive
7 basic social services.

PH-11

8 The families in Visitacion Valley need all
9 existing Muni services, such as bus lines 9X, 30 and 45,
10 to remain undisrupted during and after construction of
11 the Central Subway. We ask for careful planning to

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

12 avoid the problems that occurred during the construction
13 of the T-Third. We ask that there be no elimination of
14 the Muni lines or the lifelines connecting Visitacion
15 Valley to downtown and Chinatown.

16 Thank you.

17 PRESIDENT ALEXANDER: Thank you.

18 Ken Nim, followed by Wayne Hu and Sabina.

19 MR. NIM: Good afternoon, Commissioners.

20 My name is Ken Nim. I'm the board president for the
21 Visitacion Valley Community Development Corporation,
22 and I share the same view as my Visitacion Valley
23 partners. And we do support the Central Subway,
24 with two precautions, particularly related to economic
25 development. And based on my experience formerly
12

1 working in Visitacion Valley, doing construction jobs
2 providing training, we learned, too, from that
3 experience.

4 First is job opportunities. Even though the
5 Third Street Light Rail did provide great opportunities
6 for jobs for the community, some of those jobs were more
7 focused on unskilled laborers and a lot of carpentry.
8 But we've got other opportunities, especially with

PH-11
Cont.

PH-12

PH-13

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project

9 the amount of work that's going to be going on in this
10 project, to provide early planning for more additional
11 higher-paying, longer-lasting type of jobs for our
12 community and, too, for our local contractors. The
13 outreach in Third Street Light Rail was pretty good, but
14 we did not see as much impact for the local contractors
15 to really get the benefit of getting the contracts to
16 work in the Third Street Light Rail.

17 So, with those two experiences we've
18 learned that we don't want to make the same mistakes
19 and to really look at how we can do a better outreach
20 in preparing our community, particularly the Chinese
21 community in the Chinatown area, contractors who might
22 have opportunities to actually work on this project, to
23 figure out how we can help them, assist them in bidding
24 on these contracts and, also, to look at a job forecast,
25 to really look at what kind of jobs really will be

13

1 available so we can work with community-based
2 organizations, work with other city programs, to really
3 provide training and get the people ready for this job.

4 We have a lot of time to come. Let's start
5 now and really move forward and create a plan so we can

Page 15

PH-13
Cont.

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6 provide better economic opportunities for our community.

PH-13
Cont.

7 Thank you, Commissioners.

8 PRESIDENT ALEXANDER: Thank you.

9 Wayne Hu?

10 MR. HU: President Alexander, Commissioners,
11 my name is Wayne Hu. I am a director of the Chinese
12 Chamber of Commerce, and today I speak on behalf of the
13 Chinese Chamber of Commerce.

PH-14

14 The Chinese Chamber of Commerce is in
15 support of this project. It is vital to our community.
16 It will create significant benefits for us. But we are
17 concerned about small businesses.

18 Almost all the Chinatown businesses are small
19 business operations owned by families who work very long
20 hours, and although there are other -- the project will
21 impact businesses in the Union Square and the downtown
22 area, the Chinatown small businesses don't have the
23 support of a national corporation.

PH-15

24 And so one of the former speakers spoke of
25 what happened in the 1989 earthquake and the taking

14

1 down of the freeway. That impacted all the businesses.
2 Because small businesses are much more fragile, some of

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3 them didn't survive. This project is going to last --

4 is projected to last five and a half years, six years.

5 But even if it lasts one year, small businesses will be

6 impacted, and a lot of them need a lot more support.

7 Our concern is that the SEIR and the SEIS

8 does not adequately address these issues nor adequately

9 address mitigations to support these businesses. You

10 talk about the residential tenants that are along the

11 corridor, but we need to make sure that we also take

12 care of those businesses, too.

13 Thank you.

14 PRESIDENT ALEXANDER: Thank you.

15 Sabina, followed by Eddie Zheng and Ronnie

16 Rhoe.

17 MS. CHEN: Good afternoon, Commissioners.

18 My name is Sabina Chen. I'm the executive director of

19 the Chinese Culture Center of San Francisco.

20 We would like to note that the SEIR for the

21 Central Subway losing one of the buildings that is set

22 for the potential site of the Chinatown station, the

23 Hogen & Vest or the Ny Yuen (ph) building, does

24 not necessarily adversely affect the eligibility of

25 Chinatown to be a historic district. We do have

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PH-15
Cont.

PH-16

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15

]

1 concerns, however, that the SEIR should address the
2 design of a replacement building and that the Central
3 Subway in Chinatown -- that would be culturally
4 appropriate to the Chinatown community.

5 Two percent of the construction cost for the
6 Central Subway is designated for public art, and it is
7 essential that the Chinatown community have a voice in
8 determining what art will represent the community in the
9 Central Subway project.

10 The Chinese Culture Center has been working
11 with the San Francisco Arts Commission and the Chinatown
12 CDC to help facilitate a public arts selection process
13 that is open and transparent to the Chinatown community.
14 The mission of the Chinese Culture Center is to
15 preserve, promote and influence Chinese-American art
16 and culture. We have been serving as an artistic voice
17 for this community since 1973.

18 The Chinese Culture Center is the obvious
19 choice to serve as a cultural facilitator between the
20 Arts Commission and the Chinatown community. We have
21 been -- the Arts Commission approached the Chinese
22 Culture Center to assist in a number of ways. I won't

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PH-16
Cont.

PH-17

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23 go through the list, in the interests of time, but
24 in order to adequately assist the Arts Commission in
25 connecting the Chinatown community, the Chinese Culture

16

] 1 Center will need more resources than our current
2 capacity.

3 In reviewing the SEIR, we ask that the
4 Planning Commission consider the funding of a Chinatown
5 community liaison for the San Francisco Arts Commission
6 with the Chinese Culture Center.

7 Thank you for your time.

8 PRESIDENT ALEXANDER: Thank you.

9 Eddie Zheng?

10 Ronnie Rhoe?

11 MR. RHOE: Good afternoon, Commissioners. My
12 name is Ronnie Rhoe, Director of Community Development
13 with Chinese Affirmative Action.

14 The SEIR report references the critical need
15 for improved transit accessibility along the Central
16 Subway corridor, given the high employment rate for
17 folks who live in that part of town. In that context,
18 I'd like to talk about the importance of job creation
19 for both -- for community residents during both the

Page 19

PH-17
Cont.

PH-18

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20 construction and operational phase of the project.
21 Construction continues to be a growth sector in San
22 Francisco, providing sustainable wages and a clear
23 career path. Unfortunately, many limited English
24 proficient residents of the neighborhoods that will
25 be impacted by the project have little to no access to

17

1 the apprenticeship programs and contractors that will
2 ultimately be working to build this project.

3 The trades made improvements over the years
4 in terms of its accessibility to English learners and
5 immigrant communities, but there is still tremendous
6 progress to be made. Further augmenting these
7 challenges, the city's flagship pre-apprenticeship
8 training program, City Build, has yet to implement a
9 language access component that would allow English
10 learner job seekers to fully participate in this current
11 construction boom.

12 The Central Subway Project offers great a
13 opportunity to coordinate efforts between the MTA,
14 the local building trades, City Build and neighborhood
15 residents to ensure career opportunities for immigrant
16 job seekers. We ask -- through that coordination, we

Page 20

PH-18
Cont.

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17 ask that the MTA create tailored programs for English
18 learner residents in the impacted neighborhoods, both in
19 preparation for construction and for MTA jobs, once the
20 project is operational. Only through this front-end
21 commitment to the trade can we ensure that hires are
22 made to kick-start a career-long commitment to the
23 trades and the MTA jobs and not simply a temporary hire
24 to fulfill the particular goals of this project.

25 We ask that this project be an investment
18

1 in a more-economically-self-sufficient family and
2 neighborhood based in Chinatown, south of Market and
3 surrounding neighborhoods.

4 Thank you for your time.

5 PRESIDENT ALEXANDER: Thank you.

6 Larry Yee, followed by Go Chen Gon Wu, Deng
7 Zhi Hing, Anna Chang.

8 (Woman and man approach the bar. The woman
9 begins translating for the gentleman)

10 COMMISSION SECRETARY AVERY: Excuse me.

11 Before you start -- before you start, the court reporter
12 is asking the speakers to speak slower, so that she can
13 get an accurate transcription of your comments.

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PH-18
Cont.

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14 Thank you.

15 MR. CHEN: (Through the translator) My name
16 is Guang Wu Chen, and I'm the president of the Ping Yuen
17 Resident Improvement Association. I'm going to give a
18 short introduction of Ping Yuen.

19 There are about 400 low-income families
20 living in Ping Yuen, and they using the transit to go
21 to work and school. We support the Central Subway, and
22 we wish to start the project as soon as possible.

23 Before the construction begins, we hope
24 that you guys can work on the preparation of notifying
25 our community that -- what kinds of activity will be
19

1 affected on the ground due to the construction and
2 the type of work that could reduce the impact in our
3 community, especially like the noise problems and the
4 pedestrian safety, et cetera.

5 Thank you.

6 PRESIDENT ALEXANDER: Thank you.

7 MS. CHANG: Good afternoon, Commissioner.
8 My name is Anna Chang, and I'm on behalf of Mr. Deng
9 Hing Zhi for Community Tenants Association, the
10 vice-president, because he has a afternoon doctor

PH-19

PH-20

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11 appointment, so he wanted to make sure that I read to
12 the Commissioner.

13 Overall, CTA -- Community Tenants
14 Association -- is a nonprofit, grass-roots agencies,
15 and we have, like, city-wide members. Many are
16 seniors. We've been in the city almost -- over 20
17 years.

18 We really -- on behalf of our residents,
19 I really support and also feel that this is very
20 important, Central Subway to Chinatown. And I feel
21 that we've been waiting for this plan for 20 years.
22 And not only for our seniors' sake, but it's for our
23 mixed generations. It's really convenient. And, also,
24 a lot of our seniors' families are riding -- use public
25 transportation as their transport to different places.

20

1 So, therefore, we feel that it's very important.

2 And there's a couple points that we feel
3 that we want to address Commissioner; that, you know, we
4 want MTA to have enough notice to the community when it
5 start and also the -- for the projects. And then you
6 guys should utilize far media notification for
7 community.

Page 23

PH-21

PH-22

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8 And, most important, we feel that we want
9 to increase more -- better service for public
10 transportation, pedestrian safety.

11 Thank you.

12 PRESIDENT ALEXANDER: Thank you.

13 Carmen Ho, followed by Anthony Eng, Doreen
14 Der-McLeod.

15 MS. DER-McLEOD: Commissioners, my name is
16 Doreen Der-McLeod. I'm the executive director of Donna
17 Deena Cameron House. And some of the things I was going
18 to say have been said, so I don't want to repeat.

19 We are in support of the project, but we
20 want to make sure that mitigations are taken into
21 consideration for small businesses and that job
22 opportunities be available for the community -- and
23 especially in the transit sector area, which is a
24 growing area for our community.

25 Thank you.

21

1 PRESIDENT ALEXANDER: Thank you.

2 Leon Chow?

3 MR. CHOW: Good afternoon, Commissioners.

4 My name is Leon Chow. I'm the chairperson of the San

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PH-22
Cont.

PH-23

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5 Francisco Chinese Progressive Association located at
6 1042 Grant in the Chinatown.

7 Our organization is very supportive of the
8 SEIR, but also I don't want to repeat about the same
9 comment that the organizations from previous speakers,
10 like Visitation Valley or Chinatown, mentioned.
11 But our Chinese Progressive Association has always
12 been advocate for immigrant workers, either unemployed
13 or been displaced, and we are working on getting job
14 opportunity to have them getting -- working for --
15 on the job ladder for a better job and permanent job.
16 So, the purpose of make sure that the work has been
17 done and moving forward with the example about the
18 Third Street Light Rail Project and how it's going
19 about getting the jobs and make sure that immigrant
20 workers, displaced workers, will get the full benefit
21 of the opportunity for the construction phases is really
22 important.

23 So, thank you very much.

24 PRESIDENT ALEXANDER: Thank you.

25 Cynthia Joe?

22

1 MS. JOE: Good afternoon, Commissioners.

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PH-24

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2 Once upon a time, I was a planning commissioner
3 appointed by Mayor Willie Brown back in the days of
4 1996 when the stipend was 15 dollars, and the marathon
5 meeting that I had was starting with the Live-Work
6 Projects and ending with the Sutro TV tower after 12
7 midnight.

8 I am a member of the Presbyterian church
9 in Chinatown at 925 Stockton Street. The church will
10 be submitting a letter before the December 10, 2007
11 deadline. We are in support of a Chinatown station.

12 I am speaking as an individual sinner, not
13 to raise hell about environmental issues' impacts on the
14 church.

15 According to the Executive Summary,
16 Alternative 3B is less costly and requires a shorter
17 construction period. At the proposed Chinatown station
18 next to the church, what wind, sunlight and shadow
19 studies are being done to look at the environmental
20 issues and impacts of a 65-foot high development next
21 to the church and the Gordon Lau Elementary School yard?
22 Mitigation measures should include setbacks and various
23 buildings adjacent to the church and 65-foot height at

PH-25

PH-26

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24 the Washington-Stockton portion.

PH-26
Cont.

25 There will be a loss of 17 units of housing.
23

PH-27

1 What replacement housing will there be for the folks
2 that will be displaced?

3 What about settling and vibration due to
4 construction? They will be rocking and rolling in

PH-28

5 Chinatown. What plans are made for rat abatement
6 and vermin control in the Chinatown community? Please,

PH-29

7 no construction noise around the church on Sundays.
8 Never on a Sunday.

PH-30

9 Let's work together to keep the process
10 moving to build the Central Subway to Chinatown by 2016
11 as projected. And by God's grace, we hope we'll be able
12 to use it by then.

13 Thank you.

14 Oh, I have a written statement, so -- it
15 leaves out all the "hell" and the humor.

16 COMMISSION SECRETARY AVERY: Thank you.

17 PRESIDENT ALEXANDER: Thank you.

18 David Lee?

19 MR. LEE: My name is David Lee, and I am
20 the second generation of three generations of my family.

PH-31

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21 We're members of the Presbyterian church in Chinatown,
22 and we are definitely in support of this project. But
23 there are two historical facts that this church has
24 sacrificed and I wish to share with you and a request.
25 This concerns the selection -- the possible selection
24

]

1 of 3B, which would be a station on Stockton and
2 Washington Street.

3 Historically, the church has given up
4 property to build the Gordon Lau School, who at that
5 time called it the "Stockton School." Of course, this
6 was in support -- schools in the neighborhood, of
7 course, it's a benefit to all.

8 The second is that the church recently went
9 through a major renovation. The renovation took over
10 seven years. Two of those years was dealing with the
11 San Francisco Landmarks Board.

12 The original design was rejected by the
13 building department. They requested that we go before
14 the Landmarks Board, and the Landmarks Board prevailed.
15 They would not allow us to change any of the designs,
16 at great cost to the church. We had to refabricate the
17 church building.

PH-31
Cont.

Ph-32

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18 And as you can see before you, that is the
19 present design of the building. What benefited from
20 the church was the addition of a third story, which has
21 a re-set and is the new sanctuary of the building.

22 On the second page, you'll see that on the
23 sanctuary are windows that have natural lighting. What
24 we are requesting is that, in the event that this site
25 gets selected, that we have a representative from the

25

1 church to be involved with the design process. As you
2 can see, the peak of the building is 49 feet tall. 65
3 feet is the line that is above the building.

4 PRESIDENT ALEXANDER: Thank you.

5 MR. DAVID LEE: Thank you.

6 PRESIDENT ALEXANDER: Ben Lee?

7 MR. BEN LEE: I'm Ben Lee. I'm the president
8 of the Chinatown Photographic Association. We situated
9 at 132 Waverly Place. I'm here to speak on the legacy
10 of this project.

11 We fully support this project.

12 I'll try to address the public arts
13 requirement for the stations.

14 I have three things I want to say. I travel

PH-32
Cont.

PH-33

PH-34

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15 around the world. I think Chinatown is a living museum.

16 When we decide any of this public artwork, I think we
17 should have that in mind.

18 Also, Chinatown is our home away from home.

19 I don't live in Chinatown, but I go to Chinatown every
20 day, every week. It's a living town, a living culture.

21 When we decide this art, we have to keep that in mind.

22 And I think we also have heard from the other
23 speakers it's going to be a project for as long as San
24 Francisco is around. It's a living legacy that we have
25 to carry.

26

1 And there are a lot of good artists in San
2 Francisco. And I want the Commission to remember, when
3 we decide on this public art, we get all the artists,
4 whether from Chinatown or any other area, to work
5 together, so that we can make the station a living
6 museum, a walking museum, so everybody can enjoy.

7 And as far as I'm concerned, there's no
8 better people that can help to coordinate this but the
9 Chinese Culture Center, because they've been there for
10 years. We have been a member for years. And I want to
11 support them for this project.

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PH-34
Cont.

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12 Thank you.

13 PRESIDENT ALEXANDER: Thank you.

14 Pam Wu, followed by Joan Wood and Cindy Wu.

15 Pam Wu?

16 Joan Wood?

17 MS. WOOD: Yes. Good afternoon,

18 Commissioners. My name is Joan Wood, and I live on

19 Houston Street. It's in North Beach. I'm a member of

20 Telegraph Hill Dwellers, one of their committees, and

21 also Friends of Washington Square.

22 I don't think a station north of Market

23 Street is really necessary. Anyone who's been to

24 Chinatown knows that people certainly don't have any

25 problem getting there. And I think that the upheaval --

27

□

1 six years of upheaval is really not worth it. But I

2 think this project has gone on long enough that it's

3 pointless for me to say that I object to it.

4 I do think that the confines -- the border

5 of Chinatown is blurred. To me -- I've lived, since

6 1962, continuously in North Beach on Telegraph Hill,

7 and I think the border is clearly at Grant and Broadway,

8 the north border of it.

PH-35

PH-36

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9 I notice that the Metropolitan
10 Transportation Authority designated six affected
11 neighborhoods. We're not one of them, although
12 we're obviously affected. I suppose we're lumped
13 with Chinatown and downtown. But that accounts for
14 the fact that Telegraph Hill Dwellers hasn't weighed in
15 on this, which they certainly will be doing so before
16 December 10.

PH-36
Cont.

17 I just saw a digest of the EIR yesterday,
18 as did the head of the Planning and Zoning Committee
19 yesterday. It's been analyzed. The EIR has been
20 analyzed by one of our directors. He says this EIR
21 doesn't give complete coverage to the impacts in North
22 Beach, particularly if you've got a boring machine, for
23 gosh sake, coming up at Columbus and Union Street.

PH-37

24 And an example of the deficiencies of the
25 EIR -- it's simple to say this. They mentioned two bus
28

1 lines that would be disturbed. There's six bus lines.
2 They left off four of them.

3 Also, there's no comment about what will
4 happen to the dirt that is thrown up at Washington
5 Square Park.

PH-38

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6 PRESIDENT ALEXANDER: Thank you.

7 MS. WOOD: Thank you.

8 PRESIDENT ALEXANDER: Cindy Wu?

9 MS. WU: Good afternoon, Commissioners. My
10 name is Cindy Wu. I work for the Chinatown Community
11 Development Center. I'm reading a letter on behalf of
12 Chi-Hsin Shao.

13 Dear Commissioners, my name is Chi-Hsin
14 Shao, a member of the Community Advisory Group
15 representing Yerba Buena Alliance. The CAG has
16 been working very closely with the MTA staff and its
17 consultants in the deliberation of the Muni Central
18 Subway alignment and station locations.

19 I would like to report to you that the MTA
20 staff and its consultants have been listening to the
21 suggestions and comments provided to them by the CAG.
22 The Central Subway alignment has been modified from
23 Third Street to Fourth Street. This new alignment and
24 its extension to Chinatown would provide tremendous
25 benefits to Muni riders, especially those who live,

29

1 work and shop in the San Francisco Chinatown. With the
2 Central Subway project, these riders would not need to

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3 wait for the crowded number 30 bus line that sometimes

4 people see several totally-full buses come by, not

5 able to board the bus. The benefits to Muni riders

6 would potentially trigger better access for patrons to

7 Chinatown and thus benefit Chinatown economically.

8 For the station at the Yerba Buena area,

9 we would suggest a name of Yerba Buena Garden. This

10 issue was discussed at the Board of Directors of Yerba

11 Buena Alliance and has been communicated to MTA staff

12 and its consultants.

13 Sincerely yours, Chi-Hsin Chao.

14 PRESIDENT ALEXANDER: Thank you.

15 April Vernanocion?

16 MS. VERNANOCION: Hello. My name is April

17 Vernanocion, and I'm with the South of Market Community

18 Action Network, and I wanted to share some of my concerns

19 in regards to some of the construction that's going to

20 take place in the south of Market.

21 First, I would like to say that we're in

22 support of quality public transportation for low-income

23 families and seniors, of which Central Subway is one of

24 those, but we wanted to talk about specific mitigation

25 measures necessary to address, especially during the

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PH-39
Cont.

PH-40

PH-41

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30

1 construction phase, the impact of construction on the
2 seniors that are living on Fourth Street, as well as
3 the youth that are at the middle school on Fourth and
4 Harrison, as well as -- as you all know -- and you've
5 heard me say this many times before -- there is about
6 40 thousand cars that pass by Sixth Street every day.
7 And so we're concerned about the re-routing of traffic
8 onto the Sixth Street area. It was a real mess this
9 weekend because of the Oracle convention.

10 And so these are the types of things that
11 need mitigation. And the EIR states that there's no
12 feasible mitigation measures, but I think there needs
13 to be more looked at on there.

14 As well as there's a lot of discussion,
15 particularly in the adjacent eastern neighborhoods,
16 about transit-oriented development and density along
17 transit lines. I'm really concerned that this density,
18 an increase in housing, is only going to be available
19 for those who are able to afford market-rate housing.
20 So I'm also concerned about the indirect displacement
21 of individuals that would result from this increased
22 density in housing. So I think there should be some

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PH-41
Cont.

PH-42

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23 specific mitigations or increased affordable housing
24 along these transit corridors in the south of Market.

PH-42
Cont.

25 So we would like more time, also, to
31

1 analyze the EIR and provide written concerns beyond
2 the December 10 timeline. There isn't much analysis
3 and information on the impact on the south of Market.

PH-43

4 So, thank you.

5 PRESIDENT ALEXANDER: Thank you.

6 I have no additional speaker cards. Is
7 there anyone else desiring to comment on this item?

8 MS. WEISS: Good afternoon, Commissioners.
9 My name is Ernestine Weiss, and I've followed the
10 Central Subway since the beginning.

11 And I'm a very huge advocate of
12 transportation in San Francisco. If you've ever ridden
13 the number 30 line -- as one of the ladies said before,
14 it is a nightmare. You cannot approach a bus. So
15 the Central Subway would relieve all that congestion on
16 the surface and put people underground where the Central
17 Subway will move thousands of people much quicker than
18 the buses could ever do.

PH-44

19 So this is very important and is sorely

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20 needed in Chinatown. I live in the Financial District,
21 and I use the Number 1 quite often. And when I have
22 to use the 30, I dread it. But this will be a wonderful
23 addition, and it will be worth the inconvenience that --
24 the noise, and all these things that people worry about
25 will take place. I'm sure that these conditions will

32

1 be mitigated to the best way possible.

2 So, good luck and God speed. Thank you.

3 PRESIDENT ALEXANDER: Thank you.

4 Next speaker, please.

5 MS. PEEL: Commissioners, my name is

6 Pauline Peel. I'm a resident of the Bay View District

7 and a member of the Community Advisory Group since its

8 inception, and I've stayed on with the group to work on

9 the Central Subway project.

10 One of the driving forces behind our

11 neighborhood support of the project was the promise

12 of connectivity with the city. As you know, the

13 southeast -- Bay View, Vis Valley -- is pretty isolated,

14 and our hope was to have better access to downtown and

15 connecting buses.

16 After looking through the supplemental EIR, I

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PH-44
Cont.

PH-45

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17 noted that attention was paid to potential disruptions
18 that affect neighborhoods, and I think the proposed
19 accommodations seemed pretty adequate. I feel that
20 proper outreach and cooperation with neighborhood
21 stakeholders will be forthcoming and to the extent that,
22 as tax payers, we will look into making that, putting
23 that into effect.

24 I support the existing project and look
25 forward to the extensions, first to North Beach and,

33

] 1 finally, to the wharf.

2 Thank you so much.

3 PRESIDENT ALEXANDER: Thank you.

4 Next speaker, please.

5 MS. CHEN: Hi. Good afternoon. My name is
6 Inna Chen. I'm part of a youth group called Adopt An
7 Alleyway.

8 Public transportation is really important
9 to youth. Youth are like one of the main people who
10 relies the Muni because, without Muni, how could we go
11 to school or community events or to just hang out with
12 friends? We don't have cars, so Muni is the only way we
13 can get around in.

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PH-45
Cont.

PH-46

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14 I heard stories from my fellow triple A
15 members saying how it's really hard to get from their
16 schools -- Lowell, Washington and Keena Burton (ph) --
17 to go to Chinatown. It takes, like, 20 to 40 minutes
18 just to go from downtown to Chinatown, which is a lot.

PH-46
Cont.

19 I, personally, live on the border of Daly
20 City and San Francisco, and it takes me about three to
21 four hours to commute to Chinatown to go to work.

22 I am 100 percent supportive of the Central
23 Subway, but that doesn't mean that I don't have any
24 concerns. Please put community input into the noise
25 reduction of service, blocking of streets, corridors

PH-47

34

1 and... I know that everyone that I know knows those
2 are just little prices to pay for something great like
3 the Central Subway.

4 And also youth should be included into the
5 art process of making the subways nice, because youth
6 has a lot of creativity, but we don't have much place
7 to express it at.

PH-48

8 Thank you.

9 PRESIDENT ALEXANDER: Thank you.

10 Is there anyone else desiring to comment on

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11 this item? Is there any additional public comment?

12 Seeing none, public comment is closed.

13 Written comments will be accepted at the

14 Planning Department's offices until the close of

15 business on December 17, 2007.

16 Commissioners? Commissioners Antonini?

17 COMMISSIONER ANTONINI: Thank you for a lot

18 of very good comments.

19 And I think I'm in agreement with almost

20 everything I heard today. I think this is a wonderful

21 project, unlike some of the things that, perhaps, for

22 cost reasons, are being promoted on Van Ness, like

23 the Bus Rapid Transit, which takes away lanes and is

24 somewhat -- you know, this complements; it doesn't

25 compete with the existing buses. And so I think this is

35

1 going to allow, for example, Fourth Street and Stockton

2 Street to have easier movement aboveground for bicycles,

3 for pedestrians, for cars and for buses. So that's one

4 of the things.

5 I favor the option being modified which has

6 the Fourth Street route and then has one less -- one

7 station aboveground, and the portal has been moved

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PH-49

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8 further north -- the southern portal -- so it's closer
9 to the 80 freeway.

PH-49
Cont.

10 And I would concur with those who advocate
11 for completion with the boring machine all the way to
12 Washington Square with a fifth station -- if you count
13 the aboveground one in the south of Market -- as one
14 of the stations proposed as soon as possible.

15 Also, I would strongly advise that options
16 be looked at in the future to continue the line to
17 Fisherman's Wharf and then, perhaps, moving westward
18 to the Marina, Presidio and the Richmond District.

PH-50

19 Originally, one of the first BART plans,
20 before Marin backed out of the BART system in the
21 early 60's, was to have a second spur go through San
22 Francisco to Marin and would have followed a lot of
23 the same course as this conceivably could eventually.
24 Whether or not it all needs to be subway through all
25 those areas is a matter for future discussion.

36

1 But I think the key issue here is that
2 you have your own right-of-way. So, rather than being
3 captive to whatever congestion occurs on the street,
4 the subway moves belowground and -- or if it's

PH-51

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5 aboveground, has its own right-of-way and is not tied
6 into things that may occur aboveground that they can't
7 prevent.

PH-51
Cont.

8 Some things I heard. I think transfer
9 is a very important thing, and I think that has to be
10 addressed at all the stations, to be able to get into
11 BART and Muni from the new stations that will be built.

PH-52

12 One comment in the EIR was about the mini
13 stations. I'm not quite sure of the exact size of the
14 stations, but I want to make sure that the stations
15 are adequately large to accommodate a train length that
16 makes sense and, also, that they have enough entrances
17 and exits so people can reach the stations easily from
18 different sites that are around the area. I mean, one
19 of the very great things that was done with the BART
20 system along Market Street --BART and Muni -- is that
21 there are so many entrances and the stations are long
22 that people can come from all different directions and
23 there's rarely, if ever, congestion as people enter
24 these stations because there are many sites of access.

PH-53

25 I had a question about the amount of time

37

PH-54

1 this whole process will take. Six years seems like a

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2 long time. There's a lot to do. We hope that it's
3 well planned and well thought out so we don't have to
4 go beyond the time table and add even more to the
5 projected cost.

PH-54
Cont.

6 And there were comments about the
7 architectural and cultural appropriateness of the
8 stations. I think that's very important to address
9 those.

PH-55

10 And, also, the protection for businesses
11 that might be inconvenienced or displaced -- hopefully
12 not displaced -- during the construction process is
13 very important.

PH-56

14 And I think, also, that this is something
15 that really could go a ways towards making people less
16 reliant on cars -- at least in that particular area --
17 because this is an area that not only has residents
18 moving through it, but there's a lot of tourists, a
19 lot of visitors from throughout the Bay Area. And,
20 you know, I think the ridership figures in here speak
21 to the amount of usage this area gets.

PH-57

22 So I'm very supportive and, hopefully, we
23 can move forward as soon as possible.

SF PLANNING COMMISSION MEETING 2007-11-15 Central Subway Project
24 PRESIDENT ALEXANDER: Thank you.

25 Commissioner Bill Lee?

38

□

1 COMMISSIONER BILL LEE: Yeah, I think the

2 EIR addresses quite a few of the concerns from the

3 people that spoke today.

4 I had a couple comments.

5 One is that I -- some of the options will

6 probably force out rent-controlled units. And that's

7 a concern for me.

8 The other idea is I had a presentation by

9 Mr. John Funghi yesterday in front of the Convention

10 Visitors Bureau regarding issues of construction

11 aboveground. They are going to bore at least 50 feet

12 belowground. So I think there will be minimal types of

13 disruption, except the entranceway and the exits there.

14 I think the question of transferability is

15 an issue -- where you get off, where you get on.

16 One of the considerations Muni should look

17 at is that you want to have underground stores. Those

18 stores will displace -- maybe you should have first

19 right of refusal to rent underground stores when people

20 get on and off of Muni that way.

PH-58

PH-59

PH-60

PH-61

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21 What we did with Home Depot I don't know a
22 if we could do here, of first right of refusal, first
23 source hiring. We allocated two zip codes where Home
24 Depot would have to give first right of refusal for
25 hiring. I don't know if we could do this in Chinatown

39

] 1 or not because we do that, we may leave out the people
2 like Marlene Tran and the Vietnamese Community Center
3 down in the southeast part of town. But I think we
4 should strongly consider that.

PH-62

5 I think CPA and CA has done a good job in
6 getting people hired. I know the Ping Yuen, a lot
7 of housing people are looking for jobs. And how that
8 relates with the construction work, and training through
9 the carpenters union or the plumbers is something we
10 should look at through the mayor's office and the work
11 force development.

12 I think, all in all, this will bring closer
13 different parts of the city, and I'm very hopeful that,
14 in the future, we'll go to Phase Three and include North
15 Beach. I don't like the demarcation between Chinatown
16 and North Beach there, especially Stockton and Columbus
17 area.

PH-63

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18 PRESIDENT ALEXANDER: Thank you.

19 Commissioner Sugaya?

20 COMMISSIONER SUGAYA: Thank you.

21 Since this is a hearing on the EIS and EIR, I

22 will confine my comments to the EIS and EIR and not the

23 project.

24 I believe, on a singular issue, there is

25 some inadequacies in the treatment of impacts to

40

1 historic resources within the APE that's been defined.

2 I'll submit some comments in more detail with respect

3 to this particular issue and provide some other examples

4 from EIRs that have dealt with this in a little bit more

5 detailed fashion.

6 PRESIDENT ALEXANDER: Thank you,

7 Commissioners.

8 COMMISSION SECRETARY AVERY: With that, this

9 item is concluded.

10 Thank you.

11 (Off the record at 4:27 p.m.).

12

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14

PH-64

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1 STATE OF CALIFORNIA) SS.

2 I do hereby certify that the hearing was held at
3 the time and place therein stated; that the statements
4 made were reported by me, a certified shorthand
5 reporter and disinterested person, and were, under my
6 supervision, thereafter transcribed into typewriting.

7 And I further certify that I am not of counsel or
8 attorney for either or any of the participants in said
9 hearing nor in any way personally interested or involved
10 in the matters therein discussed.

11 IN WITNESS WHEREOF, I have hereunto set my hand

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12 and affixed my seal of office this 27th day of November,

13 2007.

14

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17

VALERIE E. JENSEN

18

Certified Shorthand Reporter

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□

Wells Whitney, Renew SF**PH-1**

Comment in support of the SEIS/SEIR is noted.

Tony Gantner, North Beach Merchants Association**PH-2**

Support for the Central Subway Project and for a fifth station in North Beach is noted. See Response to Comment AA-1 for a full discussion of project history and how the northern project boundary was established at Jackson Street. The future extension of rail service to North Beach would be facilitated by the North Beach Construction Variant tunnel construction, but a North Beach extension and station would be the subject of a future independent analysis.

PH-3

The potential disruption associated with the construction of the North Beach Construction Variant tunnel is discussed in Chapter 6.0, Construction Methods, Impacts, and Mitigation Measures. As stated on page 6-58 construction of the tunnel excavation shaft would occur in Columbus Avenue and would not disrupt Washington Park directly, but construction-related noise, dust, and vibration would temporarily affect the park users. Mitigation measures for these impacts are outlined in Sections 6.14 and 6.15.

Stephen Taber, SPUR**PH-4**

Support for the Central Subway Project and the SEIS/SEIR is noted.

PH-5

Ease of transfers is an important consideration in the planning of the Central Subway Project, particularly at the Union Square/Market Street Station that would have a direct connection to the Powell Street BART/Muni Metro Station. See Responses to Comments C2/C3 and AA-29 for a discussion of how transfers would be accommodated.

PH-6

The platforms and station access points have been designed to meet projected ridership and also to handle maximum loads in the event of an emergency. See Response to Comment AB-4 for capacity issues unique to the Union Square/Market Street Station and its relationship to the Powell Street BART/Muni Metro Station.

David Chiu, Small Business Commission and Central Subway CAG**PH-7**

Comments in support of the SEIS/SEIR and of the Central Subway Project are noted.

PH-8

See Responses to Comments A-4 and AL-2 for a discussion of the relocation process and relocation assistance (including rental or property leasing assistance) to businesses displaced by the project. The federally required Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Public Law 91-646) and the State of California Relocation Act contain specific requirements that govern the manner in which property can be acquired for public use. Adherence to the state and federal laws is designed to ensure just compensation for all acquired properties and to minimize adverse impacts on the affected property owners.

PH-9

See Response to Comment AA-34. Potential changes to transit routes during construction of the Central Subway Project are described in Section 6.3 of the SEIS/SEIR. The potential transit detour routes have not yet been identified, however, the intent would be to minimize the out of direction travel from the existing bus corridor if a detour is required, therefore such detours are likely to fall within the study area boundaries.

As the project moves into final design in the next two years following project approvals, SFMTA would work closely with the communities/neighborhoods along the alignment to assess required bus line detours or schedule changes. Any necessary route changes would be communicated to transit users well in advance of implementation.

Marlene Tran, Visitacion Valley Agents Alliance**PH-10**

Comment in support of the Central Subway Project and the connection between Visitacion Valley and Chinatown is noted. The 9X bus route will be retained when the Central Subway service is initiated. The frequencies of the surface bus routes may be modified to reflect the shift of passengers from buses to the rail line. See Response to Comment J-2 regarding the retention of surface bus lines.

Bonnie Shiu, Visitacion Valley Parent Association**PH-11**

See Response to Comment J-2. Surface bus line service will remain though the frequencies of the surface bus routes may be adjusted to reflect the shift in ridership to the rail line.

Ken Nim, Visitacion Valley Community Development Corporation

PH-12

Support for project is noted.

PH-13

Design and construction of the Central Subway Project (Alternative 3B, LPA) would generate an estimated \$188 million in professional services and labor contracts and would provide temporary employment opportunities for the City and region, which would be considered a beneficial impact. SFMTA would advertise contract opportunities in local newspapers, including the Chinese papers, to alert the local contractors to opportunities to bid on contracts. SFMTA will also work with the City Build pre-apprentice training program and with CCDC to provide advance notice to community-based organizations, including local unions, to encourage local contractors to bid on work.

Wayne Hu-Chinese Chamber of Commerce

PH-14

Support for project noted, and concern for small businesses noted.

PH-15

See Response to Comment AL-2. The eight small businesses displaced by the Alternative 3B transit-oriented station in Chinatown would be relocated within the local neighborhood, and business owners would be provided relocation assistance including rental or property leasing assistance.

Sabina Chen, Chinese Culture Foundation of San Francisco

PH-16

Comment noted that the potential loss of the Hogan and Vest building at 933-949 Stockton Street, or of the Ning Yuen building at 814-828 Stockton Street, would not affect the potential eligibility of Chinatown as a Historic District.

The Historic Architectural Resources specialist on the SEIS/SEIR team and the Landmarks Preservation Advisory Board staff are in the process of consulting with the State Historic Property Office (SHPO), as part of the Section 106 review process, to issue a Finding of Effect Report. The Finding of Effect will be the final determination of the historic significance associated with the removal of one of the contributory buildings in Chinatown. SFMTA has also retained the services of an architectural firm to develop conceptual layouts for the proposed stations as part of early design development, and will include the services of architectural historians to work with architects to develop a station exterior that compliments (would not distract from) the historic character of the Chinatown neighborhood. See Response to

Comment T-2 for additional mitigation measure proposed to ensure compatibility with the Chinatown cultural character.

PH-17

See Response to Comment H-3 for a description of the community involvement in the arts program. The request for the Chinese Culture Center to serve as the formal community liaison with the San Francisco Arts Commission, and for SFMTA to provide funding for these services, is outside the scope of the SEIS/SEIR, but could be considered as part of project approvals. There are no environmental impacts related to the arts program.

Ronnie Rhoe, Director of Community Development, Chinese Affirmative Action**PH-18**

SFMTA is committed to outreach to the communities and neighborhoods along the Central Subway Corridor prior to and during construction to inform residents and businesses of the project schedule and job/contracting opportunities related to the project. This will include public outreach in both English and in Chinese. SFMTA will work with City Build to encourage the development of information to English learner trainees about job opportunities that will be advertised for the Central Subway Project.

Guang Wu Chen, Ping Yuen Resident Improvement Association**PH-19**

Support for the project is noted.

PH-20

The request for advance notice of construction activities to the low-income housing project is noted. SFMTA will provide periodic updates to the community along the Central Subway Corridor (Stockton Street between Market Street and Jackson Street) about the project, and about the schedule for construction activities. Information will be provided in both Chinese and in English in newsletters, on the project web site, and in local newspapers. Notices will be posted along the corridor one month prior to start of construction to alert residents and businesses to parking displacement next to the station site. Environmental compliance monitoring during construction will ensure that noise, dust, and storm water impacts are minimized in accordance with the mitigation measures in the SEIS/SEIR. Pedestrian safety measures (construction fencing, barriers, and posted safe passageways) will be implemented during construction, and will be monitored by SFMTA.

Anna Chang, on behalf of Deng Hing Zhi, Community Tenants Association

PH-21

Support for the project is noted.

PH-22

Timely notice of start of construction is requested. See Response to Comment PH-20.

Doreen Der-McLeod, Executive Director of Donaldina Cameron House

PH-23

Support for the project is noted. Community information related to opportunities for small businesses and job opportunities will be available in local newspapers, the Central Subway newsletter, and the project web site prior to and during construction (see Response to Comment PH-20).

Leon Chow, Chair of the San Francisco Chinese Progressive Association

PH-24

Support for the SEIS/SEIR is noted. Opportunities for immigrant workers and displaced businesses will be part of the community outreach program (see Response to Comment PH-20).

Cynthia Joe, Presbyterian Church of Chinatown

PH-25

Support for station at 933-949 Stockton Street (Alternative 3B) is noted.

PH-26

A preliminary shadow analysis has been conducted for the station building outline (assuming maximum height and bulk) at Stockton and Washington Streets to show the maximum new shadows on the Gordon Lau Elementary School schoolyard, the Methodist Church across Washington Street, from the proposed station and the adjacent Presbyterian Church on Stockton Street. (See Appendix K of the SEIS/SEIR). Shadows on the south wall of the Methodist Church, from the proposed Chinatown Station, would occur in the morning and early afternoon hours during winter months (December 21), but not during other times of day or months of the year. Shadows would occur on the eastern edge of the Gordon Lau Elementary School playground in the morning hours and at noon during all seasons of the year and during the winter months (December 21) in the afternoon. There would be no additional shadows cast on the Presbyterian Church from the proposed Chinatown Station based on the preliminary analysis.

A wind study was not conducted because a building height of 65 feet would not substantially change existing wind patterns. The SEIS/SEIR assessed the potential impacts of a conceptual design, or building

envelop, for the station that considers full-build out of the site. The final architectural design for the transit-oriented station would be developed in coordination with the Chinatown community, including the church. Graduated setbacks would be considered as one of the potential measures to minimize shading or wind, if necessary.

PH-27

Residents displaced by the project would be provided relocation assistance and would be relocated in the local area, if possible. If the new transit-oriented station is designed to include replacement housing units (estimated to be 24 units for Alternative 3B) that would increase the number of low-income housing units in the area.

PH-28

Vibration and potential settlement from ground disturbance during construction is addressed in Section 6.10.2 of the SEIS/SEIR on page 6-90 and 6-91. Provisions such as concrete diaphragm walls to support the excavation and instrumentation to monitor settlement and deformation would be used to ensure that structures adjacent to tunnel alignment are not affected by adjacent and nearby excavations. Rigorous geomechanical instrumentation will be used to monitor ground movement during construction. Equipment used for underground construction, such as the tunnel boring machines and mine trains could generate vibration levels that could result in audible ground-borne noise levels at the surface and may cause intrusive low level vibration above the tunnel. Monitoring during construction will measure the actual noise and vibration levels within and outside of the Church and will provide project-specific information to develop additional measures to minimize impacts, if necessary. Monitoring information/data will be shared with church representatives.

PH-29

Monitoring during construction will include monitoring for rodents, and if found abatement measures would be undertaken.

PH-30

Construction activities that would have significant noise or vibration impacts above ground would be limited during evening hours and during weekends; particularly work that would affect Church services on Sundays or evening school sessions when background noise levels are lower than day-time background levels.

David Lee, member Presbyterian Church in Chinatown

PH-31

Support for the project is noted.

PH-32

See Response PH-26 above. Final architectural design will consider ways to minimize changes to natural light and shading from the transit-oriented station to the church.

Ben Lee, President, Chinatown Photographic Association

PH-33

Support for the project is noted.

PH-34

The point that Chinatown is a ‘living walking museum’ is noted. The Chinatown community and stakeholders will be actively involved in the transit-oriented development at the station, the station design, and the arts program. The history of the building at 933-949 Stockton Street will be recorded and preserved, and may be exhibited in the station, as described on page 6-76.

Joan Wood, North Beach, Telegraph Hill Dwellers, Friends of Washington Square

PH-35

Section 1.0 for the SEIS/SEIR describes the Purpose and Need and Project Goals and Objectives for the Central Subway Project. SFMTA’s objective for the proposed Project is to complete the second phase of the Third Street Light Rail Project and provide transit improvements in the Central Subway Corridor. The project limits of the Central Subway Corridor (and stations) were set at Jackson Street in Chinatown as part of the Third Street Light Rail Project definition for the 1998 FEIS/FEIR. This is a supplemental environmental document that tiers off of the original 1998 environmental document and focuses on the second phase of the project. Existing surface congestion in Chinatown and in Downtown San Francisco make service reliability for existing buses (9-San Bruno, 30-Stockton, and 45-Union/Stockton) that connect with other transit lines unreliable with extended wait times and slow operating speeds. A subway system into the heart of Chinatown will provide reliable transit service and improved connections to other parts of the City.

PH-36

The northern limit of the Central Subway to the vicinity of Jackson Street is consistent with the previously approved project definition and is not meant to define the limits of Chinatown. The North Beach Tunnel Construction Variant, described on page 2-33 of the SEIS/SEIR is a construction variant

that was added to the environmental review to minimize impacts from construction in the heavily congested Stockton Street area of the station. The purpose of the temporary shaft would be for removal of the tunnel boring machine, and possible delivery of materials for the Chinatown Station.

The North Beach Neighborhood has been invited by SFMTA to identify a representative to join the Community Advisory Group (CAG) for the Central Subway. Representative of the Telegraph Hill Dwellers (F. Joseph Butler and Vedica Puri) are on the project mailing list for newsletters and project updates. Friends of Washington Square have been added to the project mailing list.

PH-37

The construction shaft would be open for about six months during construction, and otherwise would be covered with decking. Impacts of the TBM retrieval shaft are addressed under each environmental topic, as the last part of the impact discussion for Alternatives 3A and 3B. Transit impacts of the temporary construction retrieval shaft are addressed on pages 6-35 and 6-36 of the SEIS/SEIR. While two travel lanes would remain open along Columbus Avenue, the 30-Stockton and the 45-Union/Stockton bus overhead trolley wires would need to be temporarily relocated to accommodate continued transit operations. The 41-Union and Coit Tower lines, which run on Union Street, and the 9X-San Bruno would not be affected.

PH-38

Dirt from excavation of the temporary shaft would be removed by truck during excavation, and would not be stockpiled in the park. Haul routes are described on page 6-25 (an estimated five trucks per day over a six month period) and would travel southeast on Columbus to Broadway and east on Broadway.

Cindy Wu on behalf of Chi-Hsin Shao, representing Yerba Buena Alliance

PH-39

Support for project is noted, especially revised alignment from Third Street to Fourth Street which will benefit Muni riders who live, work and shop in Chinatown.

PH-40

The requested change in the name of the proposed Moscone Station to Yerba Buena Garden Station will be considered by the SFMTA Board when the project comes before them for adoption (anticipated in late Summer 2008).

April Vernanocion, South of Market community Action Network**PH-41**

Support for improved transit for low-income families and for seniors is noted. Figure E-9 on page E-28 of Appendix E in the SEIS/SEIR shows traffic during construction being routed to Fifth Street, not Sixth Street for Alternative 3B. Prior to final design, the SFMTA would work with the local community to develop temporary transportation system management (TSM) measures along detour routes to minimize traffic congestion. Also when detours are initially implemented, traffic control police would monitor critical intersections for corrective action.

PH-42

Provision of low-income housing could be part of the proposed future transit-oriented development above the stations.

PH-43

The Planning Commission did not take action to extend the public comment period. The close of comments for the Draft SEIS/SEIR was December 10, 2007 as originally advertised.

Ernestine Weiss**PH-44**

Support for project is noted.

Pauline Peel, Bay View District and CAG member**PH-45**

Central Subway will provide good connectivity to the Bay View and Visitacion Valley. Public outreach will be maintained throughout the final design and construction phases of the Central Subway Project.

Inna Chen- Youth Group Adopt An Alleyway**PH-46**

Support for project is noted.

PH-47

The Chinatown community through CCDC and other planned outreach will continue to be actively involved in the planning, final design, and construction phases of the project. SFMTA will work with the community to minimize impacts. An independent environmental compliance monitor will be retained during construction to ensure that noise, dust, runoff, traffic disruption is minimized and mitigated. Monitoring reports will be made available to the public to provide input to compliance conditions.

PH-48

See Response to Comment H-3 for discussion pertaining to involvement of the community in the arts program. Youth, like other members of the community would be actively encouraged to participate. A special Youth Arts Program was undertaken for the T-Third Light Rail Line; where temporary art exhibits by youth were displayed for a five-month period. A similar program could be undertaken in conjunction with the Central Subway Project.

Commissioner Antonini**PH-49**

Expressed support for the Central Subway Project and Alternative 3B.

PH-50

See Response to Comment AA-1 for a full discussion of project history and how the northern project boundary was established at Jackson Street. The future extension of rail service to North Beach would be facilitated by the North Beach Construction Variant tunnel construction, but a North Beach extension and station would be the subject of a future independent analysis.

PH-51

Support for an exclusive right-of-way for the Central Subway is noted.

PH-52

Ease of transfers is an important consideration in the planning of the Central Subway Project, particularly at the Union Square/Market Street Station that would have a direct connection to the BART/Muni Metro Powell Street Station. See Responses to Comments C2/C3 and AA-29 for a discussion of how transfers would be accommodated.

PH-53

The platforms and station access points have been designed to meet projected ridership and also to handle maximum loads in the event of an emergency. See Response to Comment AB-4 for capacity issues unique to the Union Square/Market Street Station and its relationship to the BART/Muni Metro Powell Street Station.

PH-54

The construction period for Alternative 3B would last approximately 5.5 years and would require an extensive coordination effort among city agencies, BART, Caltrans, the TJPA, and community business

and neighborhood organizations to minimize impacts and delays. See Response to Comment AA-31 for references to the construction impacts and construction management approach.

PH-55

See Response to Comment PH-26 for discussion of how design of the station sites would be undertaken to ensure integration of the new buildings into the neighborhood character. Additional mitigation language has also been added to ensure compatibility with the cultural character of Chinatown (see Response to Comment T-2).

PH-56

See Responses to Comments A-4 and AL-2 for a detailed discussion of the required procedures to minimize the impact to displaced businesses and residents. Alternative 3B would result in the displacement of eight businesses and 17 residential units in Chinatown and one business at the Moscone Station. Chapter 6.0 of the SEIS/SEIR outlines the potential construction impacts and recommended mitigation measures to minimize the construction-related impacts.

PH-57

Comment supporting the Central Subway Project and the potential for increasing the transit mode share is noted.

Commissioner Bill Lee**PH-58**

Concern regarding the potential loss of affordable housing units is noted. As noted in the mitigation measures for each of the alternatives on pages 6-52 through 6-54, redevelopment of the station sites in Chinatown with affordable housing is recommended to minimize the impact of the displacement of existing affordable housing units. As noted in Response to Comment PH27, the number of replacement units would likely result in a net increase of affordable housing upon completion of the proposed Central Subway station site redevelopment.

PH-59

As noted in Chapter 6.0, the use of a tunnel boring machine during the construction of the subway would reduce the surface impacts along Fourth Street and Stockton Street (see pages 6-35).

PH-60

See Responses to Comments C2/C3 and AA-29 for a discussion of how transfers would be accommodated.

PH-61

Underground retail is not proposed as part of the Central Subway Project, but there would be opportunities in the future to provide connections to the underground stations.

PH-62

See Responses to Comments W-5 and W-6 for ensuring that local residents are informed of job opportunities associated with the project.

PH-63

Comment regarding future extension of the rail line to North Beach is noted. See Response to Comment AA-1 for a full discussion of project history and how the northern project boundary was established at Jackson Street. The future extension of rail service to North Beach would be facilitated by the North Beach Construction Variant tunnel construction, but a North Beach extension and station would be the subject of a future independent analysis.

Commissioner Sugaya

PH-64

The potential impacts on historic architectural resources are discussed in Section 5.4.3 (operation impacts), pages 5-21 to 5-25 and 6.7.2.1 (construction-related impacts), pages 6-72 to 6-82. Additional mitigation measures have been added to this section to provide further protection of historic structures during construction in response to comments provided by the Landmark Preservation Advisory Board (see Response to Comments AH-4 and AH-5). No further comments were received from Mr. Sugaya.

5.0 STAFF INITIATED TEXT CHANGES

This chapter contains changes to the text of the SEIS/SEIR that were determined appropriate by the SEIS/SEIR preparers subsequent to publication of the SEIS/SEIR. These changes generally clarify text in the SEIS/SEIR or provide updated information. The changes are presented by chapter. For major changes in data, explanations of the changes are provided below. Minor editing changes, such as spelling or grammatical corrections have not specifically been noted in this chapter, but are included in Volume 1.0, Final SEIS/SEIR.

There are eleven major changes in text that were initiated by the SEIS/SEIR preparers. These are summarized below.

- **Operational Plan for the T-Third** – Further work undertaken by the SFMTA staff to optimize the transit operating plan was incorporated into the analysis completed for the Central Subway. This required changes to the transit operation descriptions as well as cost estimates that were based on the revised operations plan.
- **Travel Demand Forecasts** - Since the preparation of the Draft SEIS/SEIR was initiated, the San Francisco Transportation Authority has updated the San Francisco CHAMP travel demand forecasting model. Model inputs such as travel behavior characteristics and modal choice assumptions were revised; greater detail was added to the model zone system; and the transportation network was updated. The model was then recalibrated to the base year. With the updated inputs, new travel demand forecasts were generated for the Central Subway Project using the refined operational plan for the T-Third line. These new ridership projections showed lower ridership on the T-Third line and on the Central Subway corridor than previously reported.

Use of the updated travel demand forecasts brings the ridership for the Final SEIS/SEIR into consistency with the New Starts assumptions from the 2007 submission to FTA.

The SEIS/SEIR has been revised to incorporate the new assumptions and the updated daily trip projections, the T-Third and Central Subway ridership, and the modified travel times. These new projections and travel time results were also incorporated into updated project Operations & Maintenance costs and cost-effectiveness ratings for the project.

- **Traffic Level of Service** – The traffic level of service analysis was also updated to reflect more refined assumptions on signalization and traffic operations at each intersection. This resulted in

changes to the level of service during the a.m. peak hour of analysis and changes in the projected delays for the p.m. peak hour.

- **Parking Updates** – Additional parking counts were conducted on the block of Stockton Street between Washington and Jackson Streets, where the Chinatown Station is proposed under Alternative 3B, and updates were provided to reflect additional parking loss on Ellis Street to accommodate expansion of the existing BART station access/egress for emergency exiting. In addition, errors in the parking loss summary for the Fourth Street blocks between Townsend and Bryant Streets were corrected for the semi-exclusive and mixed-flow options of Alternative 3B.
- **Clarification of Mezzanine and Concourse levels of subway stations** – Text was revised throughout the document to clarify the distinction between the concourse (public passenger area) and the mezzanine (non-public areas accommodating staff functions and equipment storage) levels.
- **Adoption of Alternative 3B as the Locally Preferred Alternative (LPA)** – The SFMTA Board adopted Alternative 3A as the Locally Preferred Alternative in June 2005 and that was reflected in the Draft SEIS/SEIR. On February 19, 2008, the SFMTA Board adopted Alternative 3B as the LPA. This change was incorporated into the FEIS/FEIR.
- **Mitigation Monitoring and Reporting Program** – A Mitigation Monitoring and Reporting Program has been drafted for the Project. This is included in a new Appendix I.
- **Concurrence of “De Minimis” finding from Recreation and Parks Commission** – At the February 21 meeting of the San Francisco Recreation and Parks Commission they concurred with a “de minimis finding for impacts to Union Square Park for Alternative 3B, the newly selected Locally Preferred Alternative. A copy of Resolution No. 0802-011, dated February 21, 2008 is included in a new Appendix J.
- **Text Revisions to note required changes to Planning Code** – Section 812..1.39b of the San Francisco Planning Code prohibits demolitions of residences in Chinatown. To construct the Chinatown Station, an amendment to the Planning Code would be required.
- **Update to the New Starts Process** – FTA has requested that the Final SEIS/SEIR include an update to the New Starts Process which is included in Chapter 9.0.
- **Final SEIS/SEIR Distribution List** – The distribution list for the Final SEIS/SEIR has been included in Chapter 11.0.

None of these changes resulted in the identification of new significant environmental impacts.

The proposed text changes follow by Chapter of the SEIS/SEIR. Text additions are noted by an underline and text deletions are noted by a ~~striketrough~~.

ABSTRACT

Revisions to the 1998 EIS/EIR Alternative are clarified in the second sentence, second paragraph:

“These changes include: a new double-track segment along Fourth and Stockton Streets between Brannan and Market Streets as an alternative to use of Third, ~~Harrison, Kearny,~~ and Geary Streets; extension of the planning horizon year from 2015 to 2030; the addition of above ground ventilation shafts for tunnel segments and stations; the use of off-street access to stations; a deep tunnel under Market Street; and the potential extension of a construction tunnel to the north end of the Project near Washington Square under Columbus Avenue for removing the tunnel boring machine.”

The fourth and fifth sentences of the third bullet, Alternative 3B description are revised as follows:

“The primary entrance to the Union Square station for Option B would be on the Geary Street side of the plaza rather than the Stockton Street side; and vent shafts, ~~but~~ would be in the Ellis/O’Farrell garage rather than the plaza, minimizing impacts to the ~~plaza park~~. The Chinatown Station entrance for Option B would be located on the west side of Stockton Street ~~between~~ at the corner of Clay and Washington Streets, and would not affect Willie “Woo Woo” Wong Playground.”

The last sentence, last paragraph is revised as follows:

“Unavoidable impacts are described for: traffic at Third and King, Fourth and King, Fourth and Harrison, and Sixth and Brannan Streets; displacement of affordable housing units; and for prehistoric archaeological resources during construction and potential impacts to potentially eligible historic architectural buildings and ~~Districts in the~~ Chinatown ~~and Union Square Station areas~~ Historic District. Impacts to Section 4(f) properties meet the criteria for a “de minimis” impact finding.”

PREFACE

The first paragraph and the first sentence of the second paragraph of the Preface are revised as follows:

“This Final Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR) is presented in two volumes: Volume I is the SEIS/SEIR with

text changes resulting from responses to comments on the Draft SEIS/SEIR, and from the Public Hearing, and also includes Staff Initiated Changes between the Draft and Final SEIS/SEIR. Volume II includes copies of all comment letters on the Draft SEIS/SEIR, copies of comment forms from the Public Hearings, and the transcript from the Public Hearing. Each comment letter and form is followed by responses to comments. The staff-initiated text changes follow by Chapter of the SEIS/SEIR. Text additions are noted by an underline and text deletions are noted by a strikethrough. The two volumes constitute the Final SEIS/SEIR.

The SEIS/SEIR is prepared pursuant to the requirements of both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA)."

The following text is added to the end of the second paragraph, last page of the Preface"

"Concurrence with a "de minimis" finding for impacts to Union Square Park by the Recreation and Parks Commission is attached as Appendix J. This satisfies the Section 4(f) requirement for the Project."

EXECUTIVE SUMMARY

The last sentence, second paragraph, page S-1 is revised as follows:

"...extension of the planning horizon year from 2015 to 2030; the addition of above ground ventilation shafts for tunnel segments and stations; the use of off-street access to stations; a deep tunnel under Market Street; and the potential extension of a construction tunnel under Stockton Street and Columbus Avenue to the north end of the Project near Washington Square for removing the Tunnel Boring Machine (TBM)."

Table S-1, page S-5 is revised to included updated ridership projections as follows:

2030 Weekday Ridership T-Third Line	60,030 <u>24,600</u>	89,790 <u>76,300</u>	88,840 <u>77,600</u>	99,230 <u>76,600</u>
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The first sentence, last paragraph, page S-5 is revised as follows:

"The No Project/TSM Alternative has a projected weekday ridership of ~~60,030~~24,600 passengers for 2030 on the T-Third Line."

The following text is added at the end of the third paragraph, page S-7:

“Platform lengths would be approximately 250 feet at all subway stations.”

The first sentence, first paragraph, page S-8 is revised as follows:

The Enhanced EIS/EIR Alignment has a projected weekday ridership of ~~89,790~~ 76,300 passengers for the year 2030 on the T-Third Line.

The second to last sentence, second paragraph, page S-8 is revised as follows:

“It would continue north under Fourth and Stockton Streets as a double-track operation to a terminus in the vicinity of Stockton and Jackson Streets.”

The first sentence, last paragraph, page S-8 is revised as follows:

“This alternative was selected as the Locally Preferred Alternative (LPA) by the MTA Board at its meeting of June 7, 2005, but was replaced by Alternative 3B as the LPA by MTA Board action on February 19, 2008.”

The first sentence, second paragraph, page S-9 is revised as follows:

“The subway station platforms would be 200-250 feet in length (compared with 250 feet in similar to Alternative 2) and narrower in of varying widths and but would accommodate two-three car trains using high-floor LRVs.”

The first sentence, third paragraph, page S-9 is revised as follows:

“Alternative 3A has a projected weekday ridership of ~~88,840~~ 77,600 passengers for 2030 on”

The following text is added as the first sentence, fourth paragraph, page S-9:

“This alternative was selected as the LPA by the MTA Board on February 19, 2008, replacing Alternative 3A.”

The following text is added to the end of the fourth paragraph, page S-9:

“The subway platforms would be 200 feet in length (compared to 250 feet in Alternative 3A) and 26 feet in width and would accommodate two-car trains using high-floor LRVs.”

The first sentence, sixth paragraph, page S-9 is revised as follows:

“Alternative 3B has a projected weekday ridership of ~~99,230~~ 76,600 passengers for 2030 on the T-Third Line.”

The San Francisco Planning Commission , Department of Recreation and Parks, and San Francisco Board of Supervisors entries in Table S-10 on page S-41 are revised as follows:

San Francisco Planning Commission	General Plan Review/Referral for all aspects of project which occur in public rights-of-way, and amendments to appropriate portions of General Plan, Transportation Element, <u>and Planning Code.</u>
San Francisco Department of Recreation and Parks	Section 4(f) “de minimis” approval. Prop. K review and approval for shadow analysis. Long-term encroachment permits for Union Square plaza.
San Francisco Board of Supervisors	Approval of General Plan <u>and Planning Code</u> amendments. Adoption of Redevelopment Plan amendments. Approval of property acquisitions, including eminent domain. Approvals required for use of City rights-of-way and Park property.

The first paragraph, page S-11 is revised as follows:

“Townsend and Brannan Streets, one block south of the original location, with a single portal remaining on Fourth Street between Brannan and Bryant Streets; and, (2) a double-track portal on Fourth Street between Townsend and Brannan Streets that used a two-track alignment via Third, Fourth, Harrison, Kearny, Geary Streets and Stockton Streets. The public preference was for a double-portal on Fourth Street. Members of the public also suggested a Fourth Street alignment, which was possible using a deep crossing at Fourth/Stockton and Market Streets.”

The second sentence, second paragraph, page S-11 is revised as follows:

“It maintained the Chinatown Station on Stockton Street ~~in the vicinity of Clay and Washington Streets~~ at Clay Street, combined the Union Square/Market Street Stations with northern entries in the vicinity of Union Square and southern entries using BART/Muni Metro Powell Street Station entrances; and relocated the Moscone Station to Fourth Street between Howard and Folsom Streets.”

The last two sentences, last paragraph, page S-11 are revised as follows:

“After the publication of the NOP in June 2005, a Fourth/Stockton Alignment Option B was developed based on public input, and design studies and to reduce the costs of the Project. This option reduced the size of the stations and provided new station entrance options for Union Square/Market Street and a new station location and entrance options for Chinatown. On February 19, 2008, subsequent to publication of the Draft SEIS/SEIR, the MTA Board voted to replace Alternative 3A with Alternative 3B as the LPA.”

The fourth to sixth sentences, first paragraph, page S-12 are revised as follows:

“Muni’s total LRV fleet size, including spares, would be 175 LRVs though the peak demand would vary from ~~127-130-139-142~~ LRVs by alternative. The diesel bus fleet would ~~remain the same as~~ increase by 23 buses from the existing condition in 2030 for all alternatives, but ~~and No Project/TSM fleets, with the same~~ peak demand would not change. The trolley bus fleet would ~~remain the same~~ increase by five buses in 2030, but peak demand would be reduced by six trolleys over existing conditions and by eleven trolleys over No Project/TSM with the Project.”

Table S-2, page S-12 is revised as follows:

TABLE S-2
ANNUAL OPERATING STATISTICS

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (Systemwide Fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand ³ (Systemwide Fleet size) ^{4,3}	Total Annual LRV Car Hours T-Line (Systemwide)
Existing (2007) T-Third	5 minutes	377 (495-473) diesel buses; 225 (333-331) trolley buses	2,592,230	9 minutes	118-119 (151) LRVs	84,800 <u>109,400</u> (568,500) (570,200)
No Project/TSM (2030)	5 minutes	377 (495) diesel buses; 230 (333-336) trolley buses	2,622,030	7 minutes	129-137 (171) LRVs	80,400 <u>117,000</u> (609,500) (602,700)
Enhanced EIS/EIR Alignment (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	130-142 (175) LRVs	87,500 <u>83,900</u> (591,200) ³ (621,800) ³
Fourth/Stockton Alignment Option A (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	127-139 (175) LRVs	78,000 <u>76,700</u> (581,700) ³ (614,500) ³
Fourth/Stockton Alignment Option B (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	130-140 (175) LRVs	86,400 <u>78,000</u> (590,100) ³ (615,900) ³

Notes: ¹ Source for 2007 bus equipment demand and bus hours is the Muni 2006-2025 Short Range Transit Plan, December 2005 and Dan Rosen, MTA, May 2007. Revised Dan Rosen, MTA, January 2008.
² Headway refers to the time between transit vehicles on a given line.
³ Assumes one-car trains operating in the peak for the Central Subway on both the long and short lines and two car trains on the very short line.

The last sentence, last paragraph, page S-12 is revised as follows:

“Site-specific ~~detailed~~ conceptual engineering was used to develop capital costs for the proposed stations.”

The second to last sentence, first paragraph, page S-13 is revised as follows:

“Escalation factors were applied to the ~~Project costs~~ to account for ~~recent~~ escalation trends experienced in major transportation infrastructure projects to arrive at ~~2007~~ Year-of-Expenditure (YOE) costs.”

The third paragraph, page S-14 is revised as follows:

“Table S-4 summarizes the ~~total~~ annual operating and maintenance costs for the Muni system, broken out by vehicle type, for each alternative.”

Table S-4, page S-14 is revised as follows:

TABLE S-4
OPERATING OPERATING AND MAINTENANCE COST SUMMARY
(MILLIONS \$ / YEAR OF OPERATING EXPENSES)

	No Project	Alternative 2	Alternative 3A	Alternative 3B
2016	\$707.9 <u>\$852.61</u>	\$693.4 <u>\$852.73</u>	\$693.0 <u>\$849.65</u>	\$693.2 <u>\$849.91</u>
2030	\$1,145.9 <u>\$1,261.49</u>	\$1,122.3 <u>\$1,262.13</u>	\$1,121.7 <u>\$1,257.77</u>	\$1,122.1 <u>\$1,258.31</u>
Increment Over No Project/TSM				
2016	N/A	(\$14.3) <u>\$0.11</u>	(\$14.9) <u>(\$2.96)</u>	(\$14.7) <u>(\$3.20)</u>
2030	N/A	(\$23.6) <u>\$0.64</u>	(\$24.2) <u>(\$3.72)</u>	(\$23.8) <u>(\$3.18)</u>
Source: MTA, May 2007-AECOM Consult Inc. April, 2008.				

The first and third sentences, last paragraph, page S-14 are revised as follows:

“Table S-5 presents the existing and 2030 weekday transit ridership estimates for the corridor. Currently about ~~92,870 person trips~~ 93,300 transit trips are made in the Corridor each weekday...By 2030, it is estimated that transit ridership would increase to somewhere between ~~147,450~~ 142,600 and ~~162,610~~ 145,200 passengers in the Corridor depending on the Alternative.”

Table S-5, page S-15 is revised as follows to reflect the updated ridership projections for the Central Subway Project.

The last sentence, first paragraph, page S-15 is revised as follows to reflect updated ridership projections.

“The introduction of light rail in exclusive or semi-exclusive in the Central Subway Corridor would reduce the travel times for Muni patrons to between ~~5.0~~ 4.6 and 7.0 minutes as noted for the Build Alternatives.”

TABLE S-5
ESTIMATED WEEKDAY TRANSIT RIDERSHIP
EXISTING AND 2030 CONDITIONS

LRT/BUS LINE	2000	2030 NO PROJECT/TSM	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
CORRIDOR BOARDINGS					
RAIL					
T Long Line ¹	n/a	60,030-24,600 ⁴	59,710-44,500	60,670-45,800	65,830-44,900
T Short Line	n/a	n/a	30,080-18,900	28,170-19,000	33,400-18,900
T-Third Very Short Line	n/a	n/a	12,900	12,800	12,800
Subtotal		60,030 24,600	89,790 76,300	88,840 77,600	99,230 76,600
BUS					
Line 15 ²	31,130-28,300	n/a	n/a	n/a	n/a
Lines 9X, 9AX, 9BX	9,320-10,600	29,560-23,000	30,790-22,300	30,760-20,800	24,770 21,200
Lines 30, 45 ³	52,420-54,400	57,860-76,600	42,030 46,600	42,510-44,800	38,290-44,800
Subtotal	92,870-93,300	87,420 99,600	72,820 68,900	73,270 65,600	63,060 66,000
TOTAL IN CORRIDOR:	92,870 93,300	147,450 124,200	162,610 145,200	162,110 143,200	162,290 142,600
Increase Over Existing:	0	54,580-30,900	69,740-51,900	69,240 49,900	69,420 49,300
Increase Over No Project/TSM:	0	0	15,160-21,000	14,660-19,000	14,840-18,400
Notes:	¹ Central Subways T-Third long_line to Visitacion Valley, and T-Third short-line to 18 th and Third Streets, and T-Third very short line to Fourth and Townsend Streets.. ² Line 15-Third shifts to 9X San Bruno. ³ 45 Extended into Mission Bay n/a Not Applicable Ridership is defined as the number of passengers boarding. Source: San Francisco Model, January 2007. Revised 2008.				

The first through third paragraphs, page S-16 and continuing on page S-17 are revised as follows:

“In 2030, under the No Project/TSM Alternative three of the five Study Area intersections (Third/Fourth/King Streets, Fourth/Harrison Streets, and Sixth/Brannan Streets) would operate at LOS E or F in the a.m. and p.m. peak hour and three intersections (Third/King Streets, Fourth/King Streets, and Sixth/Brannan Streets) would operate at LOS F in the p.m. peak hour. While most of these intersections already operate at LOS E or F as they serve as the major access points to the regional freeway system, the traffic delays would increase in the future. For the No Project/TSM Alternative, the Fourth and Harrison Third and King Streets intersection would degrade from LOS B-D to LOS E in the a.m. peak

hour. ~~Implementation of striping changes at the Fourth/Harrison intersection would mitigate these adverse impacts.~~

Implementation of the Enhanced EIS/EIR Alignment would reduce traffic delays on Fourth Street in the a.m. peak hour, but would increase delays experienced by motorists at the Third and King Streets and Sixth and Brannan Streets intersections when compared to the No Project/TSM Alternative. The intersection of Third and King Streets would degrade from LOS ~~D-E~~ to LOS F in the a.m. peak hour as a result of the implementation of this alternative and the Sixth and Brannan Streets intersection would continue to operate at LOS F. During the p.m. peak hour, the Third and King, ~~Fourth and King~~, and Sixth and Brannan Streets intersections would all continue to operate at LOS F, but with increased delays.

Implementation of either the Fourth/Stockton Alignment Option A or Option B rather than the Enhanced EIS/EIR Alignment would alleviate some of the delays on Third Street, but result in greater delays on Fourth Street. The Third and King and Sixth and Brannan Streets intersections under Alternatives 3A or 3B would operate as LOS F during the a.m. (a degradation from LOS ~~D-E~~ at Third/King Streets resulting from the Project) and p.m. peak hour (continued LOS F operation) while the Fourth and King Streets intersection would continue to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. The intersection of Fourth and Harrison Streets would degrade from LOS ~~B-C~~ to LOS F for ~~Alternative 3B in the a.m. peak hour and from LOS B to LOS E for Alternative 3A and to LOS F for Alternative 3B in the p.m. peak hour.~~

The last sentence, third paragraph, page S-17 is revised as follows:

“The Fourth/Stockton Alignment Option B would eliminate 82 on-street parking spaces under the semi-exclusive option and ~~84~~79 parking spaces under the mixed-flow option (this option also retains some off-peak spaces on Fourth Street) in the Fourth and Stockton Street segments identified above.”

The last sentence, first paragraph, page S-18 is revised as follows:

“Under Alternative 3B, the pedestrian level of service would be reduced to LOS B, at the Chinatown Station, as a result of the increase in pedestrian activity rather than a reduction of effective sidewalk width.”

The following text is added to the end of the second sentence, fourth paragraph, page S-18:

“There would also be a temporary increase in truck traffic along the light rail alignment as a result of truck traffic associated with the removal of excavated soils and backfill around the guideway and station areas and delivery of materials.”

Table S-7, page S-19 is revised as noted on the following page.

The first two bullets, page S-32 are revised as follows:

- “traffic impacts in 2030 at the following locations: Fourth/Harrison Streets intersection (~~No Project/TSM Alternative – LOS B to LOS E in a.m. peak hour, Alternative 3A, LOS B-C to LOS E in a.p.m. peak hour, and Alternative 3B – LOS B-C to LOS F in a.m. and p.m. peak hour~~) and Third/King Streets intersection (Alternatives 2, 3A, and 3B – LOS ~~D-E~~ to LOS F in a.m. peak hour) all as a result of project implementation.”
- “displacement of 10 small businesses (10 or fewer employees) ~~and 1 or 2 residential units~~ for Alternatives 2 and 3A and displacement of 8 small businesses (10 or fewer employees) and 17 residential units (which would require a Planning Code amendment) for Alternative 3B in the predominantly minority and low-income Chinatown neighborhood;”

The second sentence, last paragraph starting on page S-33 and continuing to page S-34 is revised as follows:

“It has been determined that this use of the plaza would not be considered a significant impact and a ~~de minimus~~ de minimis finding for impact on Section 4(f) resources ~~is anticipated for Alternative 3B has been concurred with by the Recreation and Parks Commission (see Appendix J) to satisfy Section 4(f) requirements.~~”

TABLE S-7

SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Environmental Area/Impacts	Alternative 1 -No Project/TSM	Alternative 2 - EIS/EIR Enhanced Alignment	Alternative 3A - Fourth/Stockton Alignment Option A	Alternative 3B - Fourth/Stockton Alignment Option B
<p>TRANSPORTATION Traffic Operation/Cumulative</p>	<p><i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at all of the five intersections evaluated as a result of cumulative traffic growth. Third/King (a.m. peak only), Streets intersection would degrade from LOS E to LOS F in the a.m. peak hour and would continue to operate at LOS F in the p.m. peak hour. Fourth/King, and Sixth/Brannan Streets intersections would continue to operate at LOS E or F conditions in the a.m. and p.m. peak hours. The intersection of Fourth and Harrison Streets would degrade from LOS B to LOS E when compared to the existing conditions.</p> <p><i>Mitigation Measure:</i> Restriping the southbound curb lane of Fourth Street to accommodate a shared through/right turn lane to Harrison Street would mitigate the impacts to LOS B resulting in a less than significant impact.</p> <p><i>Significant environmental</i></p>	<p><i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at three out of the five intersections evaluated. The Project would have a significant traffic impact at the Third/King Streets intersection in the a.m. peak hour due to degradation in LOS from D-E to F when compared to the No Project/TSM Alternative and a cumulatively considerable contribution to the cumulative traffic impacts at the Sixth/Brannan Streets intersection during the p.m. peak hour in 2030.</p> <p><i>Significant environmental effects which can not be avoided:</i> The traffic impacts at Third/King and Sixth/Brannan Streets intersections could not be reasonably mitigated to a less-than-significant level.</p>	<p><i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at three out of the five intersections evaluated. The Project would have a significant traffic impact at the Third/King Streets intersection in the a.m. peak hour due to a degradation in LOS from D-E to F and at the Fourth/Harrison Streets intersection in the p.m. peak hour due to a degradation in LOS from C to E when compared to the No Project/TSM Alternative. This alternative would have a cumulatively considerable contribution to the adverse cumulative traffic impacts at the King Street intersections with Third and Fourth Streets and the Fourth/Harrison Streets intersection during the p.m. peak hour in 2030.</p> <p><i>Mitigation Measure:</i> Restriping the southbound curb lane of Fourth Street to accommodate a shared through/right-turn lane to Harrison Street would mitigate the impacts to LOS B resulting in a less-than-significant</p>	<p><i>Significant Impacts:</i> 1. Same as Alternative 3A, except the Project would also have a significant impact at the Fourth/Harrison Streets intersection during the a.m. peak hour when compared to the No Project/TSM Alternative and a cumulatively considerable impact on the cumulative traffic impacts at the King Street and Third Streets intersection during a.m. peak hour and the Fourth/Harrison Streets intersection during the p.m. peak hour in 2030.</p> <p>2. In addition, the portal at Fourth Street under I-80 may restrict access to the proposed bus storage facility at Perry Street and large truck movements onto Stillman Street.</p> <p><i>Mitigation Measures:</i> Same as Alternative 3A, except MTA will explore design modifications to the portal with the TJPA and Golden Gate Transit options that will permit bus access to Perry Street and truck access to Stillman Street that will to reduce the impacts to a less-than-significant level.</p>

	<p><i>effects which can not be avoided:</i> None of the remaining traffic impacts could be reasonably mitigated. <u>The traffic impacts at Third/King, Fourth/King, and Sixth/Brannan Streets intersections could not be reasonably mitigated to a less-than-significant level.</u></p>		<p>impact. <i>Significant environmental effects which can not be avoided:</i> The traffic impacts at the Third/King and Fourth/King Streets intersections could not be reasonably mitigated to a less- than-significant level.</p>	<p><i>Significant environmental effects which can not be avoided:</i> Same as Alternative 3A.</p>
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The last sentence, fourth paragraph and the fifth paragraph, page S-35 are revised as follows:

“The increase in cost over time reflects an assumed inflation rate of ~~3.5~~2.3 percent.

Due to a faster and more direct alignment, Alternative 3A creates an annual reduction of ~~2,400~~ 40,300 LRV car hours on the Central Subway Corridor and a system-wide annual ~~reduction~~increase of ~~27,800~~11,900 car hours when compared to the No Project/TSM Alternative. Alternative 3A would also reduce the number of system-wide annual bus hours by 76,400. Alternative 3B would save the same number of annual bus hours, however, it would ~~increase~~ reduce the annual LRV car hours by ~~6,000~~39,000 on the Central Subway Corridor, while ~~reducing~~increasing by ~~19,400~~13,200 the system-wide LRV hours compared to the No Project/TSM Alternative. Alternative 2 ~~yields~~would result in an annual ~~increase~~decrease of ~~7,100~~33,100 LRV car hours, a system-wide annual ~~reduction~~increase of ~~18,300~~19,100 car hours, and would reduce the number of system-wide annual bus hours by 76,400 when compared to the No Project/TSM Alternative.”

The first paragraph, page S-36 is revised as follows:

“A total of ~~\$432.2~~\$473 million in state and local capital funding has been committed to the Central Subway Project. In addition, the MTA is currently seeking \$762.2 million in federal “New Starts” funding, for a total of ~~\$1,194.4~~ \$1,235 million in capital funding identified for the Project (see Table S-8).~~Additional regional and state funding is being pursued to eliminate the funding shortfall.~~”

Table S-8 is revised as follows:

TABLE S-8
CENTRAL SUBWAY CAPITAL FUNDING PLAN (\$MILLIONS)

Source	Amount
Federal-5309 New Starts	\$762
State	\$306
Local	<u>\$126167</u>
Total	<u>\$1,194</u> <u>\$1,235</u>
Source: MTA Central Subway FY2008 New Starts Financial Plan.	

Table S-9, page S-37 is revised as noted on the following page.

TABLE S-9
SUMMARY OF MOBILITY IMPROVEMENTS EVALUATION

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
MOBILITY IMPROVEMENTS				
FTA Performance Measures				
Hours of Transportation User Benefits	○	●	●●	●●
Low Income Households Served	●	●	●	●
Employment Near Stations	●	●	●	●
Local Performance Measures				
Daily Linked Transit Trips	○	●	●●	●●
Exclusive ROW for Transit	○	●	●	●
Travel Time Between Selected Origins & Destinations	○	●	●	●
Average Operating Speed for Transit	●	●	●	●
Compatibility with SFTA's <i>Four-Corridor Plan</i>	○	●	●	●
ENVIRONMENTAL BENEFITS				
FTA Performance Measures				
Change in Regional Air Pollutant Emissions	○	●	●	●
Change in Greenhouse Gases	○	●	●	●
Change in Regional Energy Consumption	○	●	○	●
EPA Air Quality Designation	○	○	○	○
Local Performance Measures				
Partial and Full Property Acquisitions	●	●○	●○	○
Affected Parkland/Cultural Sites	●	●	●	●
Visual, Noise, and Vibration	●	●	●	●
Displaced Parking During Construction	●	●○	●○	●○
OPERATING EFFICIENCIES				
FTA Performance Measures				
Systemwide Operating Cost per Passenger Mile ⁽¹⁾	\$0.57 \$1.24	\$0.58 \$1.25	\$0.57 \$1.24	\$0.57 \$1.24
Local Performance Measures				
Systemwide Operating Cost per Passenger ⁽¹⁾	\$1.82 \$2.34	\$1.63 \$2.31	\$1.56 \$2.29	\$1.52 \$2.29
Bus Operating Cost per Revenue Bus Hour ⁽²⁾	\$254.00 \$140.02	\$209.00 \$140.34	\$209.00 \$140.32	\$209.00 \$140.32

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
Light Rail Operating Cost per Revenue Train Hour ⁽²⁾	\$303.00 \$248.20	\$298.00-\$260.32	\$305.00-\$259.98	\$299.00-\$259.84
COST EFFECTIVENESS				
FTA Performance Measures				
Incremental Cost per Hour of Transportation System User Benefit	--	\$33.58 \$30.31	\$22.73 \$21.12	\$18.36 \$21.24?
TRANSIT SUPPORTIVE LAND USE AND FUTURE PATTERNS				
FTA Performance Measures				
Existing Land Use	●	●	●	●
Transit Supportive Plans and Policies	●	●	●	●
Performance and Impacts of Policies	●	●	●	●
Other Land Use Considerations	●	●	●	●
Local Performance Measures				
Compatible with City and Area Plans	○	●	●	●
Support Revitalization Opportunities along the Central Subway Corridor Adjacent to Transit Stops/Stations	○	●	●	●
Project Serves Major Activity Centers	●	●	●	●
OTHER LOCAL CRITERIA				
Travel Time from Fourth/King to Market/Third/Fourth	○	●	●	●
Travel Time from Fourth/King to Stockton/Washington	○	●	●	●
Parking supply and on-street loading zones on or near Third/Fourth Streets and Stockton Street	●	○	●	●
Community Acceptance and Political Support	○	●	●	●
LOCAL FINANCIAL COMMITMENT				
FTA Performance Measures				
Stability and Reliability of Capital Financing Plan	--	●	●	●
Stability and Reliability of Operating Financing Plan	○	●	●	●
Local Share to Project Costs	--	●	●	●
Capital Costs Compared to Funding	--	●	●	●
Operating Costs Compared to Funding	●	●	●	●
● -High, ● -Medium High, ● -Medium, ○ -Medium Low, ○ -Low				

Table S-10, page S-41, rows related to Bay Area Rapid Transit District and San Francisco Department of Recreation and Parks are revised as follows:

Bay Area Rapid Transit District (BART)	Amendment of joint use agreement for Powell Street sStation reviews, project review, and approval for joint use of station.
San Francisco Department of Recreation and Parks	Section 4(f) "de minimis" approval. Prop. K review and approval for shadow analysis. Long-term encroachment permits for Union Square plaza.

Chapter 1.0 Purpose and Need

The text of the last two sentences, first paragraph, page 1-1 is revised as follows:

“This Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR) updates information in the Central Subway Project Study Area and focuses on changes to the Central Subway portion of the Third Street Light Rail Project that have occurred since the certification of the 1998 Final Environmental Impact ~~Study Statement~~ and Final Environmental Impact Report (FEIS/FEIR). Proposed changes to the Central Subway portion of the light rail project include: a new segment along Fourth Street between ~~Brannan-Harrison~~ and Market Streets and along Stockton Street between Market and Geary Streets as an alternative to use of Third, Harrison, Kearny, and Geary Streets; extension of the planning horizon year from 2015 to 2030; the addition of above ground ventilation shafts for tunnel segments and stations; the use of off-street access to stations; a deep tunnel under Market Street; a closed barrier fare system; and the potential extension of a construction tunnel under Stockton Street and Columbus Avenue to the north end of the Project near Washington Square for removing the Tunnel Boring Machine (TBM).”

The second sentence, third paragraph, page 1-5 is revised as follows:

“The Third Street Light Rail Project was intended to address the inequality of transit connections to the Muni Metro rail system and to regional transit services such as BART and Caltrain perceived by residents of the corridor.”

The first sentence, second paragraph, page 1-6 is revised as follows:

“As presented in Table 1-1, an ~~55-84~~ percent increase in Central Subway Corridor population and a ~~26-19~~ percent increase in the Central Subway Corridor employment is projected by 2030 (see also Figure 1-2).”

The fourth sentence, second paragraph, page 1-6 is revised as follows:

“The ~~26-19~~ percent employment increase in the Central Subway Corridor is slightly lower than the projected citywide employment growth of 28 percent over the same period.”

Table 1-1, page 1-6 is revised as follows to correct reporting errors contained in the Draft SEIS/SEIR:

TABLE 1-1
POPULATION AND EMPLOYMENT PROJECTIONS
2000 AND 2030

Area	Population				Employment			
	2000	2030	Difference	% Change	2000	2030	Difference	% Change
Central Subway Corridor	52,160	80,690 <u>96,040</u>	28,530 <u>43,880</u>	55% <u>84%</u>	280,690	352,490 <u>335,030</u>	71,800 <u>54,340</u>	26% <u>19%</u>
North Beach Variant	12,120	10,510	(1,610)	(13.3%)	6,100	6,490	390	6.4%
SF	776,730	935,050	158,320	20%	636,670	815,680	179,010	28.0%
Source: San Francisco County Transportation Authority Model, based on Transportation Analysis Zone (TAZ) data derived from 2000 Census Tract information.								
Note: Central Subway is defined by the MTC Travel Analysis Zones (and Census Tracts) that are included in the Study Area identified in Figure 1-2. This includes Census Tracts 113, 114, 117, 118, 119, 121, 123, 125, 176.01, 176.02, 178, 179.01, and 180. The North Beach Tunnel Construction Variant is defined by the MTC Transportation Analysis Zones and Census Tracts 106 and 107. There are minor differences between TAZ and Census Tract information.								

Chapter 2.0 Alternatives

The second sentence, fourth paragraph, page 2-1 is revised as follows:

“In response to public input during the 2005 Scoping process and technical recommendations from a Peer Review Panel, and in order to reduce the cost of the project, a new design (Alternative 3B) was subsequently developed for the Fourth/Stockton Alignment.”

The following text is added following the description of Alternative 3B, page 2-3.

“On February 19, 2008, the MTA, subsequent to publication of the Draft SEIS/SEIR, endorsed Alternative 3B as the LPA.”

The second bullet, third paragraph, page 2-3 is revised as follows:

- “operation of the T-Third line, which opened for passenger service in April 2007 as an extension of the ~~Castro Shuttle~~ K-Ingleside to Visitacion Valley, with associated restructured bus service in Visitacion Valley at the south end of the corridor and bus connections in Chinatown/North Beach at the north end;”

The second sentence, second paragraph, page 2-14 is revised as follows:

“This configuration was provided to not preclude a future connection of the Central Subway with a possible future Geary subway line traveling under Geary, Kearny, and Third Streets and then east via Folsom Street to the vicinity of the Transbay Terminal.”

The first sentence, third paragraph, page 2-14 is revised as follows:

“Northbound and southbound station platforms would be at two levels and would share a common ~~mezzanine~~ (concourse).”

The third and fourth sentences, first paragraph, page 2-17 are revised as follows:

“The shallow configuration of the station would preclude construction of a mezzanine and (concourse) level above the platform. Instead, access would be provided from street level to a mezzanine and (concourse) under the platform level for fare payment, and then up to the platform level via subsurface escalators, stairs, and elevators.”

The fourth sentence, second paragraph, page 2-17 is revised as follows:

“The stacked tunnels would affect the design of the Union Square Station, which would include a mezzanine and (concourse) and two platform levels (refer to Figure 2-9).”

The fifth sentence, second paragraph, page 2-19 is revised as follows:

“The underground station, between Sacramento and Washington Streets on Stockton Street, would have a mezzanine and (concourse) and one platform level (see Figure 2-10).”

The last sentence, second paragraph, page 2-21 is revised as follows:

“All subway station designs include fare gates and ticket vending machines (TVMs) per new Muni policy; this specification requires longer station layouts and typically the need for a mezzanine and ~~(concourse)~~ level.”

The station type descriptions for all the subway stations in Table 2-1, page 2-21 are revised as follows:

TABLE 2-1
ALTERNATIVE 2 - ENHANCED EIS/EIR ALIGNMENT STATION LOCATIONS

Station	Type	Location
King Street (northbound only)	Surface Station - Platform adjacent to Sidewalk	Third Street between King and Townsend Streets
Moscone	Underground - Two level stacked platform with a mezzanine <u>and</u> (concourse) level above the platform level.	Third Street between Folsom and Howard Streets
Market Street	Underground - Single level side platforms with a mezzanine <u>and</u> (concourse) level below the platform level.	Third Street between Mission and Market Streets
Union Square	Underground - Two level stacked platforms with a mezzanine <u>and</u> (concourse) level above the platform level.	Stockton Street between Geary and Sutter Streets
Chinatown	Underground – Single level side platforms with a mezzanine <u>and</u> (concourse) level above the platform level.	Stockton Street between Sacramento and Washington Streets

The third through the fifth sentences, last paragraph, page 2-21 and continuing on page 2-22 are revised as follows:

“The T-Third short line would extend from the Mission Bay Turnaround Loop (18th, Illinois, 19th, and Third Streets) to Chinatown, also operating with one-car trains and the T-Third very short line would operate from Fourth and Berry Streets to Chinatown. Service frequencies for each line would be ~~five-six~~ minutes in the peak period and ten minutes during the midday, except for the short line. The ~~Castro Shuttle~~ K-Ingleside would be extended to operate as the T-Third line under the 2030 No Project/TSM Alternative, but would operate as an independent line for the Enhanced EIS/EIR Alignment, using the 2006 configuration between Castro and Embarcadero Muni Metro Stations.”

Table 2-2, page 2-23 is revised to incorporate updates to the operational plan affecting peak headways, peak LRV fleet demand, and annual LRV car hours as noted below.

TABLE 2-2
ANNUAL OPERATING STATISTICS
ALTERNATIVE 2 - ENHANCED EIS/EIR ALIGNMENT

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (Systemwide Fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand ³ (Systemwide Fleet size) ^{3,3}	Total Annual LRV Car Hours T-Line (Systemwide)
Existing (2007) T-Third	5 minutes	377 (495-473) diesel buses; 225 (333-331) trolley buses	2,592,230	9 minutes	118-119 (151) LRVs	84,800 <u>109,400</u> (568,500) <u>(570,200)</u>
No Project/TSM (2030)	5 minutes	377 (495) diesel buses; 230 (333-336) trolley buses	2,622,030	7 minutes	129-137 (171) LRVs	80,400 <u>117,000</u> (609,500) <u>(602,700)</u>
Enhanced EIS/EIR Alignment (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	130-142 (175) LRVs	87,500 <u>83,900</u> (591,200) ³ <u>(621,800)</u> ³
Notes: ¹ Source for 2007 bus equipment demand and bus hours is the Muni 2006-2025 Short Range Transit Plan, December 2005 and Dan Rosen, MTA, May 2007. <u>Revised Dan Rosen, MTA, January 2008.</u> ² Headway refers to the time between transit vehicles on a given line ³ Assumes one-car trains operating in the peak for the Central Subway on both the T-Third long and short lines and <u>two-car trains on the T-Third very short line.</u>						

The last three sentences, first paragraph, page 2-23 are revised as follows:

“The Enhanced EIS/EIR Alignment would reduce the peak demand requirements for the combined diesel and trolley fleets over No Project/TSM which would result in a systemwide annual reduction of bus hours by 76,400. Rail headways on T-Third line would improve from the current nine minutes under existing conditions to seven minutes in the No Project/TSM Alternative and to ~~five~~ six minutes under the Enhanced EIS/EIR Alignment. The additional LRV route miles and service frequencies associated with the new Central Subway service would result in an annual ~~increase~~ decrease of ~~7,100~~ 33,100 LRV car hours on the ~~Central Subway Corridor~~ T-Third line, but a system-wide annual reduction of ~~18,300~~ 19,100 car hours.”

The first four sentences, last paragraph, page 2-23 are revised as follows:

“The Enhanced EIS/EIR Alignment would require ~~four~~ six additional LRVs (~~three~~ five peak LRVs and one spare) compared to the No Project/TSM Alternative. Muni’s total fleet size, including spares, would be 175 LRVs with ~~130~~142 LRVs in the peak. The diesel bus fleet would be increased by 23 buses, but the ~~and~~ peak demand would remain the same as under the existing condition and the No Project/TSM Alternative. The trolley bus fleet would ~~remain the same as under~~ increase by five buses from the existing conditions ~~and No Project/TSM Alternative~~ by 2030 for Alternative 2, but the peak demand would be reduced by six vehicles over existing conditions and eleven vehicles over No Project/TSM.”

The fourth sentence, second paragraph, page 2-28 is revised as follows:

“Between Townsend and Brannan Streets ~~eight~~ 18 parking spaces would be eliminated on Fourth Street.”

The second sentence, third paragraph, page 2-28 is revised as follows:

“This station would have a mezzanine and ~~(concourse)~~ and one platform level that would serve both northbound and southbound trains.”

The first sentence, last paragraph, page 2-28 is revised as follows:

“Immediately north of Howard Street, the alignment would descend and continue in a twin side-by-side tunnel configuration to permit a deep crossing of the Market Street Subway and an easement under buildings at 790-798 Market Street/2 Stockton Street (Assessor’s Parcel 0328-002) (see Figure 2-14).”

The second sentence, fourth paragraph, page 2-28 is revised as follows:

“An additional stairway ~~set~~ would be located in the sidewalk on the west side of Fourth Street just north of Howard Street and an escalator on the north side of Howard Street, just west of Fourth Street.”

The third sentence, last paragraph, page 2-28 is revised as follows:

“The station would have a ~~common~~ mezzanine and ~~(concourse)~~ and one center platform level that would serve both northbound and southbound trains.”

The fourth sentence, last paragraph, page 2-31 is revised as follows:

“It would have a mezzanine and ~~(concourse)~~ and one platform level for north and southbound trains. ”

The second paragraph, page 2-33 is revised as follows:

“A double crossover and twin storage tracks, capable of storing two ~~three~~ two-car trains, would extend north of this station to Jackson Street.”

The station type description for Moscone Station in Table 2-1, page 2-33 is revised as follows:

Moscone	Underground – Single level center platform with a mezzanine <u>and</u> (concourse) level above the platform level.	Fourth Street between Folsom and Howard Streets
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The third and fourth sentences, last paragraph, page 2-34 is revised as follows:

“Train headways on the T-Third line would improve from the current nine minutes under existing conditions to seven minutes in the No Project/TSM Alternative and to ~~five~~ six minutes under the Fourth/Stockton Alignment Option A. Even though there is an increase in route miles and service frequencies associated with the new Central Subway service, the result is an annual reduction of ~~2,400~~ 40,300 LRV car hours on the ~~Central Subway Corridor~~ T-Third line and a system-wide annual reduction increase of ~~27,800~~ 11,900 car hours when compared to the No Project/TSM Alternative.”

Table 2-4, page 2-35 is revised to incorporate updates to the operational plan affecting peak headways, peak LRV fleet demand, and annual LRV car hours as noted on the following page.

The first three sentences, first paragraph, page 2-35 are revised as follows:

“Fourth/Stockton Alignment Option A would require ~~four~~ three additional LRVs (~~three~~ two plus one spare) beyond the 2030 LRV fleet requirements for the No Project/TSM Alternative. In this scenario, Muni’s total LRV fleet size, including spares, would be 175 LRVs with ~~127~~ 139 LRVs in the peak period. The diesel bus fleet would ~~remain the same as the under~~ increase by 30 buses from the existing conditions and No Project/TSM (2030) Alternative, in 2030, but with the same peak demand would not change.”

TABLE 2-4
ANNUAL OPERATING STATISTICS
ALTERNATIVE 3 –FOURTH/STOCKTON ALIGNMENT OPTION A

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (Systemwide Fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand ³ (Systemwide Fleet size) ^{4,3}	Total Annual LRV Car Hours T-Line (Systemwide)
Existing (2007) T-Third	5 minutes	377 (495-473) diesel buses; 225 (333-331) trolley buses	2,592,230	9 minutes	118-119 (151) LRVs	84,800 <u>109,400</u> (568,500) <u>(570,200)</u>
No Project/TSM (2030)	5 minutes	377 (495) diesel buses; 230 (333-336) trolley buses	2,622,030	7 minutes	129-137 (171) LRVs	80,400 <u>117,000</u> (609,500) <u>(602,700)</u>
Fourth/Stockton Alignment Option A (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	<u>127-139</u> (175) LRVs	78,000 <u>76,700</u> (581,700) ^(*) <u>(614,600)</u> ³
Notes: ¹ Source for 2007 bus equipment demand and bus hours is the Muni 2006-2025 Short Range Transit Plan, December 2005 and Dan Rosen, MTA, 2007. <u>Revised Dan Rosen, MTA, January 2008.</u> ² Headway refers to the time between transit vehicles on a given line ³ Assumes one-car trains operating in the peak for the Central Subway on both the long and short lines <u>and two-car trains on the T-Third very short line.</u>						

The second and third sentences, first paragraph, page 2-35 are revised as follows:

“In this scenario, Muni’s total LRV fleet size, including spares, would be 175 LRVs with 127-139 LRVs in the peak period. ”

The second paragraph, page 2-35 is revised as follows:

“The trolley bus fleet would ~~remain the same~~ increase by five buses, but peak demand would be reduced by six trolleys over existing conditions and by eleven trolleys over the No Project/TSM Alternative.”

The second and third sentences, second paragraph, page 2-40 are revised as follows:

“The street configuration from west to east would provide: two southbound traffic lanes, the semi-exclusive double-track median, and one northbound traffic lane. In this segment, ~~all-18 out of 20~~ 18 out of 20 parking spaces on Fourth Street would be permanently eliminated. Just

north of Brannan Street the tracks would spread to accommodate a center platform between Brannan and Freelon Streets.”

The second to last sentence, third paragraph, page 2-42 is revised as follows:

“Between Brannan and Bryant Streets ~~33-29~~ out of 36 parking spaces on Fourth Street would be permanently eliminated.”

The fifth paragraph, page 2-42 is revised as follows:

“The subway for Alternative 3B would continue under Fourth Street to the Moscone Station located between Folsom and Howard Streets (see Figure 2-20), ~~the same as discussed for Alternative 3A on page 2-28.~~ Like Alternative 3A, this station would have mezzanine and concourse levels and a platform level that would serve both northbound and southbound trains. The main station entrance (escalators, stairs, and two elevators), would be in the off-street property at 266 Fourth Street. The station would be shorter than the one proposed in Alternative 3A and the emergency exit would be provided on the west side of Fourth Street mid-block between Folsom and Howard Streets.”

The first sentence, last paragraph, page 2-42 is revised as follows:

“Immediately north of Howard Street, the alignment would descend and continue in a side-by-side configuration to permit a deep crossing of the Market Street Subway and an easement under buildings at 790-798 Market Street/2 Stockton Street (Assessor’s Parcels #0328-002 and #37052-001 to 004).”

The first sentence, first paragraph, page 2-45 is revised as follows:

“...mezzanine and ~~(concourse)~~ and one platform level that would serve both northbound and southbound trains.”

The fourth and fifth sentences, second paragraph, page 2-45 are revised as follows:

“Different from both Alternatives 2 and 3A, the Chinatown Station for Fourth/Stockton Alignment Option B would be located on Stockton Street between ~~Washington Clay~~ and Jackson Streets (see Figure 2-22). It would have a mezzanine and ~~(concourse)~~ and one platform level for north and southbound trains. The main pedestrian entrance would be in a building that Muni would construct on the west side of Stockton Street south of

Washington Street (933-~~935~~949 Stockton Street, Assessor's Parcel #0211-001) to accommodate escalators, stairs, two elevators, and two emergency ventilation shafts.”

The last sentence, second paragraph, page 2-45 is revised as follows:

“The bulb-out would be extended slightly to an overall length of 38 feet, eliminating ~~about one two~~ parking spaces.”

The third sentence, first paragraph, page 2-47 is revised as follows:

“The surface station would be between 14 and 15 feet in width. The subway station platforms would be about 200 feet in length (225 feet at Union Square/Market Street), ~~(compared with 250 feet in Option 3A)~~, and 26 feet in width to accommodate two-car trains using high-floor LRVs.”

The last sentence, first paragraph, page 2-47 is revised as follows:

“All subway station platforms are single level with a mezzanine and concourse level above to permit a deep crossing of Market Street.”

The station type descriptions for all the subway stations in Table 2-5, page 2-47 are revised as follows:

TABLE 2-5

CENTRAL SUBWAY FOURTH/STOCKTON ALIGNMENT OPTION B STATION LOCATIONS

Station	Type	Location
Brannan	Surface – Single Center Platform	Fourth Street between Brannan and Freelon Streets
Moscone	Underground – Single level center platform with a mezzanine <u>and</u> (concourse) level above platform level.	Fourth Street between Folsom and Howard Streets
Union Square/Market Street	Underground -Single level center platform with a mezzanine <u>and</u> (concourse) level above the platform level and a non-paid pedestrian level between Union Square and Market Street.	Stockton Street between Market and Geary Streets
Chinatown	Underground – Single level center platform and a mezzanine <u>and</u> (concourse) level above the platform level.	Stockton Street between Washington and Jackson Streets

The third and fourth sentences, last paragraph, page 2-47 and continuing on to page 2-48 are revised as follows:

“Rail headways on the T-Third line would improve from the current nine minutes under existing conditions to seven minutes in the No Project/TSM Alternative and to ~~five~~six minutes under the Fourth/Stockton Alignment Option B (same as Option A). Even though

there would be an increase in LRV route miles and service frequencies associated with the new Central Subway service, the result ~~is~~ would be an annual reduction of ~~6,000~~ 39,000 LRV car hours (compared with ~~2,400~~ 40,300 LRV car hours for Option A) on the ~~Central Subway Corridor T-Third line~~ and a systemwide annual ~~reduction~~ increase of ~~19,400~~ 13,200 car hours, compared to the No Project/TSM Alternative and the ~~27,800~~ 11,900 car hours for Option A, which has ~~a more direct alignment~~ one fewer stations and a faster travel time.”

Table 2-6, page 2-48 is revised to incorporate updates to the operational plan affecting peak headways, peak LRV fleet demand, and annual LRV car hours as noted below:

TABLE 2-6
ANNUAL OPERATING STATISTICS FOR
ALTERNATIVE 3 – FOURTH/STOCKTON ALIGNMENT OPTION B

Alternative	Peak Headways 9-X Line ²	Diesel/Trolley Peak Demand (Systemwide Fleet size) ¹	Total Annual Diesel/Trolley Bus Hours (Systemwide) ¹	Peak Headways T-Third ²	LRV Fleet Peak Demand ³ (Systemwide Fleet size) ³	Total Annual LRV Car Hours T-Line (Systemwide)
Existing (2007) T-Third	5 minutes	377 (495-473) diesel buses; 225 (333-331) trolley buses	2,592,230	9 minutes	418-119 (151) LRVs	84,800 <u>109,400</u> (568,500) <u>(570,200)</u>
No Project/TSM (2030)	5 minutes	377 (495) diesel buses; 230 (333-336) trolley buses	2,622,030	7 minutes	429-137 (171) LRVs	80,400 <u>117,000</u> (609,500) <u>(602,700)</u>
Fourth/Stockton Alignment Option B (2030)	5 minutes	377 (495) diesel buses; 219 (333-336) trolley buses	2,545,630	5-6 minutes	430-140 (175) LRVs	86,400 <u>78,000</u> (590,100) ³ <u>(615,900)</u> ³
Notes: ¹ Source for 2007 bus equipment demand and bus hours is the Muni 2006-2025 Short Range Transit Plan, December 2005 and Dan Rosen, MTA, 2007. Revised Dan Rosen, January 2008. ² Headway refers to the time between transit vehicles on a given line. ³ Assumes one-car trains operating in the peak for the Central Subway on both the long and short lines.						

The second sentence, second paragraph, page 2-48 is revised as follows:

“Muni’s total LRV fleet size, including spares, would be 175 LRVs and 430-140 LRVs in the peak period, the same as Option A. The diesel bus fleet would ~~remain the same as~~ increase by 23 buses from the existing condition in 2030, but ~~and No Project/TSM fleets,~~ with the same peak demand would remain the same. The trolley bus fleet would ~~remain~~

~~the same increase by five buses,~~ but peak demand would be reduced by six trolleys over existing conditions and by eleven trolleys over No Project/TSM.”

The sixth and seventh bullets on page 2-50 are revised as follows:

- Surface Platform; and Trackwork; ~~and Overhead Contact System~~
- Systems (Train Control, Traction Power, Communications and Overhead Contact System)

Figure 2-29, page 2-53 is revised to correct the number of stations in the original Central Subway Project (5 stations) and to correct the miles in the T-Third operation (5.4 miles) as shown on the following page.

The last sentence, first paragraph, page 2-54 is revised as follows:

“All subway station entrances would have been located in public sidewalks. Station designs assumed Proof-of-Payment (POP) fare collection, which eliminated the need for fare gates, like those used on the Market Street Metro, at the mezzanine/concourse level.”

The third sentence, first paragraph, page 2-56 is revised as follows:

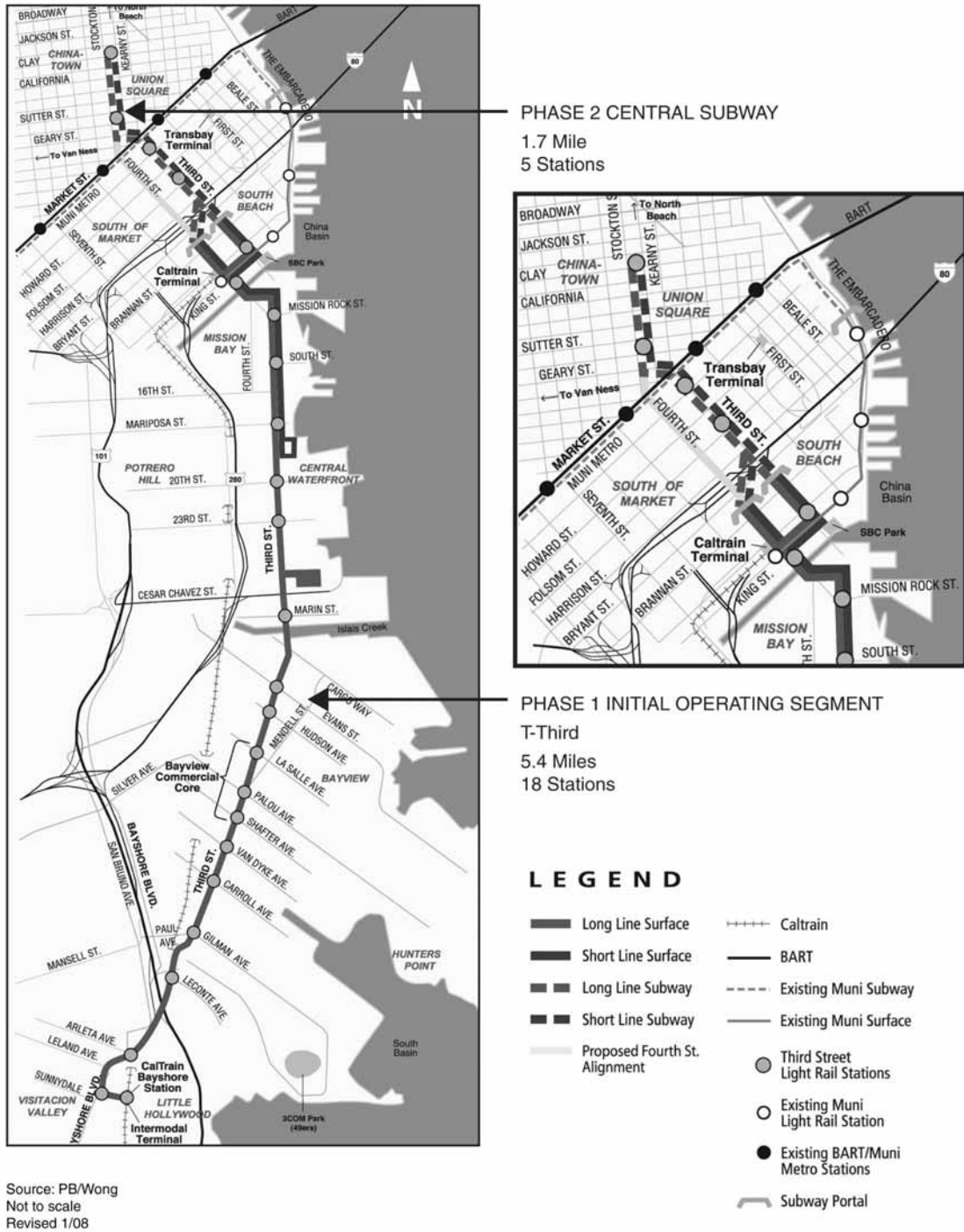
“The prevailing public preference was for a single double-track portal on Fourth Street. Members of the public also suggested a Fourth Street alignment, which was possible using a deep crossing at Fourth and Market Streets.”

The following text is added to the end of the third paragraph, page 2-56:

“On February 19, 2008, the MTA, subsequent to publication of the Draft SEIS/SEIR, endorsed Alternative 3B as the LPA.”

The second sentence, second bullet, page 2-57 is revised as follows:

FIGURE 2-29
THIRD STREET LIGHT RAIL
PHASE 1 INITIAL OPERATING SEGMENT AND PHASE 2 1998 FEIS/FEIR CENTRAL SUBWAY



“In addition, the four southbound lanes in the segment between Bryant and ~~King~~ Townsend Streets were reconfigured to two northbound and two southbound lanes.”

The third sentence, second paragraph, page 2-63 is revised as follows:

“Following the selection of the ~~Preferred Investment Strategy~~ LPA, the Final SEIS/SEIR will be completed.”

The following text is added at the end of the third paragraph, page 2-56:

“On February 19, 2008, the MTA, subsequent to publication of the Draft SEIS/SEIR, selected Alternative 3B as the LPA.”

Table 2-9, page 2-64, entries related to San Francisco Planning Commission, Department of Recreation and Parks, and Board of Supervisors are revised as follows:

San Francisco Planning Commission	General Plan Review/Referral for all aspects of project which occur in public rights-of-way, and amendments to appropriate portions of General Plan, Transportation Element, <u>and</u> <u>Planning Code.</u>
San Francisco Department of Recreation and Parks	Section 4(f) “de minimis” approval. Prop. K review and approval for shadow analysis. Long-term encroachment permits for Union Square plaza.
San Francisco Board of Supervisors	Approval of General Plan <u>and Planning Code</u> amendments. Adoption of Redevelopment Plan amendments. Approval of property acquisitions, including eminent domain. Approvals required for use of City rights-of-way and Park property.

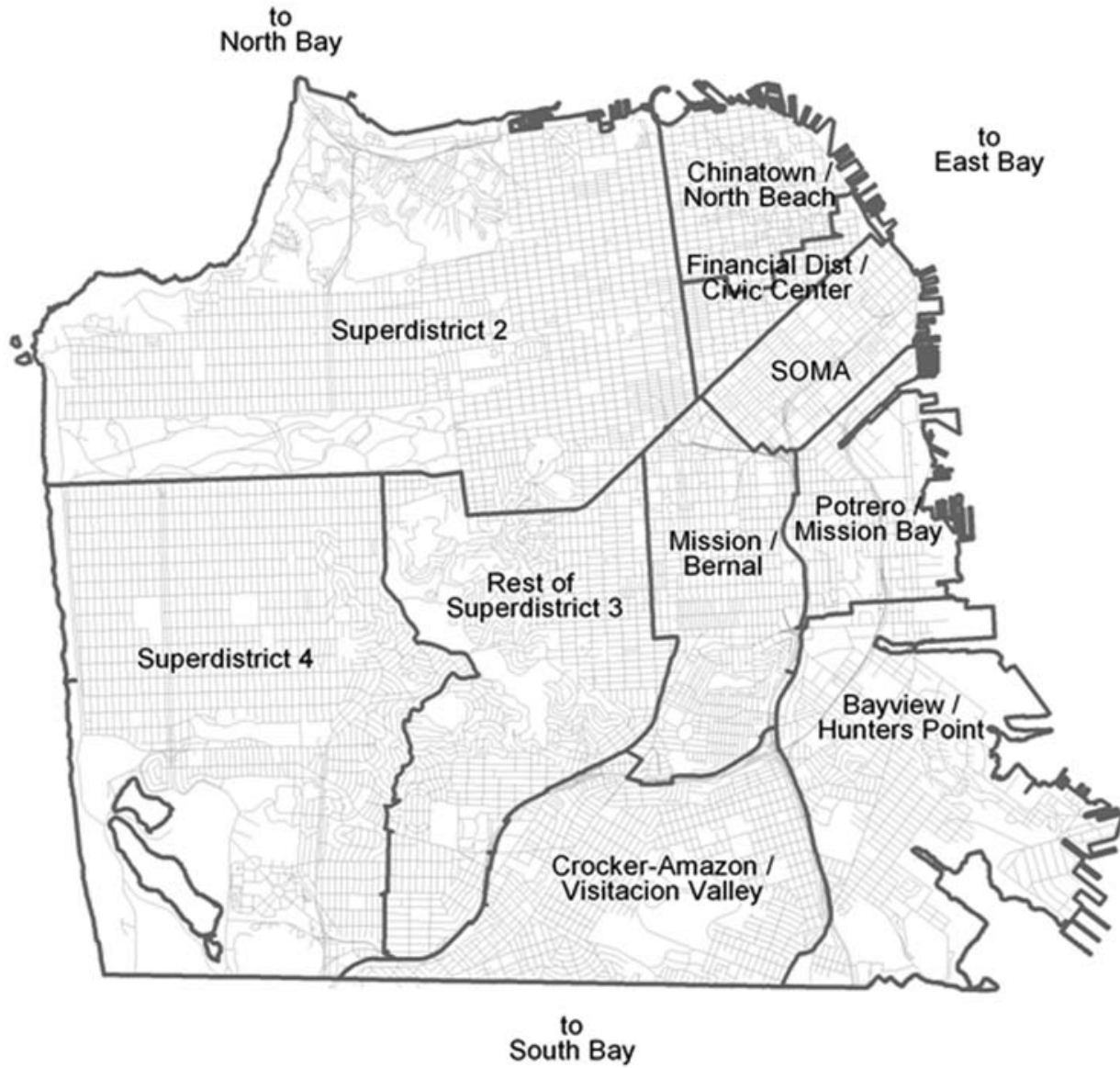
CHAPTER 3.0 TRANSPORTATION ANALYSIS

Figure 3-3, page 3-12 is revised to correct the spelling error of Civic Center as shown on the following page.

The fourth sentence, second paragraph, page 3-22 is revised as follows:

“During the p.m. peak hour, two of the Study Area intersections operate at LOS ~~C~~, ~~or~~ ~~better~~ B, with the other three operating at LOS E or F conditions as outbound traffic peaks towards the I-280 freeway on-ramps.”

FIGURE 3-3



Source: PB/Wong
Not to Scale
Revised 1/08

Table 3-4, page 3-22 is revised as follows to incorporate updated level of service analysis performed by the Department of Parking and Traffic in February 2008.

TABLE 3-4
EXISTING INTERSECTIONS
LEVEL OF SERVICE CONDITIONS

INTERSECTION	A.M. PEAK HOUR (LOS/ave. sec. delay)	P.M. PEAK HOUR (LOS/ave. sec. delay)
Third Street / King Street	D/ 36.1 <u>D/ 35.8</u>	F/ >80.0
Fourth Street / King Street	E/ 55.9	F/ >80.0
Fourth Street / Harrison Street	B/ 13.2 <u>B/ 13.5</u>	B/ 19.5 <u>B/ 18.5</u>
Sixth Street / Brannan Street	F/ >80.0	F/ >80.0
Fourth Street / Bryant Street	B/ 11.8 <u>B/ 18.9</u>	C/ 20.7 <u>B/ 19.6</u>
Source: San Francisco Department of Parking and Traffic, November 2006 and February 2007. <u>Revised February 2008.</u>		

The last sentence, last paragraph of page 3-24 is revised as follows to incorporate parking revisions:

“On those segments of Third and Fourth Streets that will be impacted by the Project, there are currently ~~172~~192 on-street parking spaces (~~201~~221 including the spaces removed for construction on Fourth Street between Bryant and Harrison Streets).”

Table 3-6, page 3-25 is revised to reflect the updated parking counts and corrections provided by the Department of Parking and Traffic in January 2008 as noted on the following page.

The last two sentences of the second paragraph, page 3-26 are revised as follows:

“There are 10 parking spaces on the block between Geary and Post Streets, ~~and~~ 14 spaces on the block between Clay and Washington Streets, and 20 spaces on the block between Washington and Jackson Streets (including truck and passenger loading zones). The average occupancy is ~~63~~75 percent for these ~~two~~three blocks of Stockton Street.”

TABLE 3-6
EXISTING ON-STREET PARKING CONDITIONS IN CORRIDOR

SEGMENT	APPROXIMATE NUMBER OF ON-STREET PARKING SPACES			NUMBER AND PERCENTAGE OF SPACES OCCUPIED	
	WEST	EAST	TOTAL	NO.	Percent
<i>Third Street</i>					
King to Townsend Streets	13 (All metered)	10 (All metered)	23	20	87%
Townsend to Brannan Streets	19 (All metered)	16 (Tow-away east side 7-9 a.m. & 4-7 p.m.)	35	20	57%
Brannan to Bryant Streets	21 (All metered)	13 (Tow-away east side 7-9 a.m. & 4-7 p.m.)	34	25	74%
Subtotal	53	39	92	65	71%
<i>Fourth Street</i>					
Townsend to King Streets	0	0	0	0	0%
Townsend to Brannan Streets	5 (All metered)	15 (All metered)	20	14	70%
Brannan to Bryant Streets	20 (All metered)	16 (10 metered, Tow-away east side 7 am-7 pm between Freelon and Brannan – affects 6 sp)	36	30	83%
Bryant to Harrison Streets ¹	17 (all metered)	12 (all metered)	29	N/A	N/A
Subtotal²	25+	31+	56	44	79%
<i>Stockton Street</i>					
Geary to Post Streets	0	10	10	4	40%
Clay to Washington Streets	11 (All metered)	3 (All metered)	14	11	79%
<u>Washington to Jackson Streets</u>	<u>8</u> (All metered)	<u>12</u> (All metered)	<u>20</u>	<u>18</u>	<u>90%</u>
Subtotal³	11 <u>19</u>	13 <u>25</u>	24 <u>44</u>	15 <u>33</u>	63% <u>75%</u>
TOTAL	89+<u>97+</u>	83+<u>95+</u>	172+<u>192+</u>	124 <u>142</u>	72% <u>74%</u>
<p>¹ This segment of Fourth Street was under construction during the recent counts. Therefore, no parking occupancy data was available.</p> <p>² Occupancy counts do not include the segment between Bryant and Harrison, so the <u>29 parking spaces between Bryant and Harrison Streets numbers</u> are not included in the subtotal.</p> <p>³ Average occupancy was not calculated for the Stockton Street blocks because the two blocks are located in different districts and an average occupancy would not give an accurate assessment of occupancies in each area.</p> <p>Source: San Francisco Department of Parking and Traffic, Sept. 27 and 28, 2006, and May 7 and 8, 2007, and January 2008.</p>					

The last two sentences of the third paragraph, page 3-26 are revised as follows:

“On the blocks between Clay and ~~Washington-Jackson~~ Streets, there are a total of ~~1434~~ metered spaces, composed of a mix of standard parking spaces and white and yellow zones. The average weekday occupancy in ~~this~~ these two blocks is ~~79-85~~ percent.”

The last two sentences of the fourth paragraph, page 3-26 are revised as follows:

“On Fourth Street between King Street and Bryant Street, 56 on-street parking spaces exist and on the ~~two-three~~ blocks of Stockton Street evaluated, there are ~~24-44~~ parking spaces. Existing parking occupancy is approximately ~~72-74~~ percent on a combined corridor-wide basis.”

The first footnote, Table 3-7, page 3-30, is revised as follows:

“¹ Counts conducted April and June 2007 p.m. peak period .”

The first sentence, fourth paragraph, page 3-36 is revised as follows:

“Under all Build Alternatives, the greatest amount of passenger activity would occur at the Central Subway Market Street Station (or Union Square/Market Street Station); ~~45-47~~ percent of system boardings for Alternative 2 and ~~50-49~~ and ~~48~~ percent of system boardings for Alternatives 3A and 3B, respectively.”

The third sentence, fourth paragraph, page 3-36, is revised as follows:

“It is estimated that ~~3849~~ percent of the passengers boarding the Central Subway system at Powell Street would be transfers from BART.” The first and third sentences, last paragraph, page 3-36 are revised as follows:

“The Fourth and King Station, serving the T-Third Line also has a high level of passenger activity ranging from ~~25-29~~ percent (Alternative 3B) to 32 percent (Alternative 3A) of system ridership...Caltrain boardings are projected to be about ~~8767~~ percent of total ridership at this station in 2030.”

Table 3-8, page 3-37 is revised to incorporate the changes to the projected transit ridership for the Central Subway Project on the following page.

TABLE 3-8
ESTIMATED WEEKDAY TRANSIT RIDERSHIP
EXISTING AND 2030 CONDITIONS

LRT/BUS LINE	2000	2030 NO PROJECT/TSM	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
CORRIDOR BOARDINGS					
RAIL					
T-Third Long Line ¹	N/A	60,030 <u>24,600</u> ⁴	59,710 <u>44,500</u>	60,670 <u>45,800</u>	65,830 <u>44,900</u>
T-Third Short Line	N/A	N/A	30,080 <u>18,900</u>	28,170 <u>19,000</u>	33,400 <u>18,900</u>
T-Third Very Short Line	N/A	N/A	<u>12,900</u>	<u>12,800</u>	<u>12,800</u>
Subtotal		60,030 <u>24,600</u>	89,790 <u>76,300</u>	88,840 <u>77,600</u>	99,230 <u>76,600</u>
BUS					
Line 15 ²	31,130 <u>28,300</u>	n/a <u>N/A</u>	n/a <u>N/A</u>	n/a <u>N/A</u>	n/a <u>N/A</u>
Lines 9X, 9AX, 9BX	9,320 <u>10,600</u>	29,560 <u>23,000</u>	30,790 <u>22,300</u>	30,760 <u>20,800</u>	24,770 <u>21,200</u>
Lines 30, 45 ³	52,420 <u>54,400</u>	57,860 <u>76,600</u>	42,030 <u>46,600</u>	42,510 <u>44,800</u>	38,290 <u>44,800</u>
Subtotal	92,870 <u>93,300</u>	87,420 <u>99,600</u>	72,820 <u>68,900</u>	73,270 <u>65,600</u>	63,060 <u>66,000</u>
TOTAL IN CORRIDOR:	92,870 <u>93,300</u>	147,450 <u>124,200</u>	162,610 <u>145,200</u>	162,110 <u>143,200</u>	162,290 <u>142,600</u>
Increase Over Existing:	0	54,580 <u>30,900</u>	69,740 <u>51,900</u>	69,240 <u>49,900</u>	69,420 <u>49,300</u>
Increase Over No Project/TSM:	0	0	15,160 <u>21,000</u>	14,660 <u>19,000</u>	14,840 <u>18,400</u>
SYSTEM BOARDINGS					
RAIL	209,510 <u>185,700</u>	280,550 <u>238,900</u>	303,190 <u>287,900</u>	311,730 <u>300,700</u>	320,630 <u>299,500</u>
BUS	543,240 <u>547,000</u>	585,470 <u>609,000</u>	590,450 <u>567,800</u>	575,760 <u>566,700</u>	566,290 <u>566,800</u>
TOTAL SYSTEM:	752,750 <u>732,800</u>	866,020 <u>848,800</u>	893,640 <u>855,700</u>	887,490 <u>867,400</u>	886,910 <u>866,300</u>
Increase Over Existing:	0	113,270 <u>116,050</u>	140,890 <u>122,900</u>	134,740 <u>134,600</u>	134,160 <u>133,500</u>
Increase Over No Project/TSM:	0	0	27,620 <u>6,900</u>	21,470 <u>18,600</u>	20,890 <u>17,500</u>
Notes:	¹ Central Subways T-Third long-line to Visitation Valley, and T-Third short-line to 18 th and Third Streets, and T-				

- ² Third very short line to the Caltrain Station at Fourth and King Streets.
³ 15-Third Line shifts to 9X-San Bruno or to the T-Third line.
 45 Union/Stockton extended into Mission Bay
⁴ Rail ridership on the K between The Embarcadero and the county line and on the N to The Embarcadero.
 N/A Not Applicable
Ridership is defined as the number of passengers boarding.

Source: San Francisco Model, January 2007. Revised January 2008.

The first sentence, first paragraph, page 3-38 is revised as follows:

“If, in the future, the Caltrain line is extended to the Transbay Terminal as proposed in Phase 2 (Downtown Extension) of the Transbay Terminal Improvements, ridership on the Central Subway line would be reduced by some portion of the ~~89~~67 percent.”

The last sentence, first paragraph, page 3-38 is revised as follows:

“The p.m. peak period ridership at each of the Central Subway stations on the key transit routes in the T-Third corridor is presented in Table 3-10.”

Table 3-9, page 3-38 is revised to incorporate the changes to the projected transit ridership for the Central Subway Project on the following page.

TABLE 3-9
ESTIMATED WEEKDAY RIDERSHIP
BY CENTRAL SUBWAY STATION
2030 CONDITIONS

STATION	2030 NO PROJECT /TSM	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
Fourth and King	---	20,250 <u>15,700</u>	20,670 <u>19,100</u>	19,520 <u>17,400</u>
Fourth and Brannan	---	—	—	6,670 <u>3,000</u>
Third (between King and Townsend)	---	2,990 <u>4,000</u>	—	—
Moscone	---	4,290 <u>3,800</u>	3,860 <u>3,500</u>	3,520 <u>2,800</u>
Market Street	---	30,540 <u>28,300</u>	32,620 <u>29,400</u>	38,510 <u>28,600</u>
Union Square	---	2,640 <u>1,600</u>		
Chinatown	---	6,570 <u>6,200</u>	8,190 <u>8,300</u>	8,050 <u>8,000</u>
TOTAL IN CORRIDOR:	---	67,280 <u>59,600</u>	65,340 <u>60,300</u>	76,270 <u>59,800</u>
<u>TOTAL IN CENTRAL SUBWAY</u>	---	<u>43,900</u>	<u>41,200</u>	<u>42,400</u>

Note: An estimated ~~89~~67 percent of passenger activity at the Fourth and King Station is related to transfers from Caltrain and about ~~25 to 32~~19 percent of passenger activity at the Market Street or Union Square/Market Street Stations is related to transfers from BART to Muni at Powell Street Station.
Ridership is defined as the number of passengers boarding.
Central Subway total excludes the Fourth and King Station which is part of the T-third line.
Source: San Francisco Model, January 2007. Revised January 2008.

Table 3-10, page 3-39 is revised to incorporate the changes to the projected transit ridership for the Central Subway Project as noted on the following page.

TABLE 3-10
2030 ESTIMATED P.M. PEAK PERIOD RIDERSHIP
FOR SELECTED ROUTES IN CORRIDOR

VOLUME	2000 BASE	2030 NO PROJECT / TSM ALIGNMENT	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
<u>T-Third Lines</u> <u>Central Subway/30</u>	<u>1,260</u> <u>---</u>	<u>1,950-11,590</u>	<u>19,020-26,990</u>	<u>16,710-27,110</u>	<u>19,720-26,820</u>
9AX	<u>1,680</u> <u>1,490</u>	<u>710-1,810</u>	<u>610-1,670</u>	<u>610-1,610</u>	<u>610-1,620</u>
9BX	<u>720</u> <u>940</u>	<u>1,080-1,900</u>	<u>1,000-1,570</u>	<u>970-1,550</u>	<u>970-1,570</u>
9X	<u>570</u> <u>750</u>	<u>5,120-1,630</u>	<u>6,210-1,690</u>	<u>5,270-1,520</u>	<u>2,730-1,580</u>
<u>30</u>	<u>8,370</u>	<u>13,900</u>	<u>4,150</u>	<u>4,140</u>	<u>4,120</u>
<u>45</u>	<u>4,600</u>	<u>8,530</u>	<u>5,620</u>	<u>5,510</u>	<u>5,480</u>
Note: The p.m. peak period is three-hour ridership. Ridership is defined as the number of passengers boarding. Source: San Francisco Model, January 2007. <u>Revised January 2008.</u>					

Table 3-11, page 3-39 is revised to incorporate the changes to the projected travel times for the Central Subway Project as follows:

TABLE 3-11
IN-VEHICLE TRAVEL TIMES FOR SELECTED TRANSIT TRIPS
EXISTING AND 2030 CONDITIONS

TRANSIT TRAVEL TIME (minutes)					
ORIGIN-DESTINATION	2000	2030 NO PROJECT / TSM ALIGNMENT	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
Fourth/King – Market Street	8.1	10.5	<u>4.4-4.7</u>	<u>3.2-3.5</u>	<u>4.5-4.9</u>
<u>Market Street to Chinatown Station²</u>	<u>3.7</u>	<u>6.5</u>	<u>2.3</u>	<u>1.1</u>	<u>1.4</u>
Fourth/King – Chinatown Station ¹	11.8	17.0	7.0	4.6	6.3
Notes: ¹ The Chinatown Station is at Stockton/Clay for the Enhanced EIS/EIR and Fourth/Stockton Alignment Option A (LPA) Alternatives, and at Stockton/Washington for the Fourth/Stockton Option B (Modified LPA) Alternative. ² <u>Market Street is the Market Street Station under Alternative 2 and the Union Square/Market Street Station under Alternatives 3A and 3B</u> Source: PB/Wong, April 2007. <u>Revised October 2007.</u>					

The first two sentences, last paragraph, page 3-39 is revised as follows:

“By 2030, the No Project/TSM Alternative transit ridership demand in the Corridor is expected to grow by nearly ~~60-33~~ percent over existing conditions, due to employment and population growth in the South of Market, Mission Bay, Bayview-Hunters Point, and the Financial districts (refer to Table 3-8). In the base year 2000, the San Francisco Model inputs indicate an estimated population of ~~58,000-52,120~~ and estimated employment of ~~142,000-280,700~~ jobs ~~within ¼ mile of~~ in the Central Subway Corridor (refer to Table 1-1).”

The first two paragraphs, page 3-40 are revised as follows:

“Planning Department, SFCTA, and Association of Bay Area Government (ABAG) forecasts, the population is expected to grow to by approximately ~~83,000-96,040~~ persons (plus ~~41-84~~ percent) and the employment is expected to grow to ~~177,000-335,030~~ jobs (plus ~~24-19~~ percent) in the Central Subway Corridor. This growth can be compared to a county-wide projected population growth of approximately ~~18-20~~ percent and employment growth of about ~~29-28~~ percent, ~~demonstrating that the~~ The rate of population growth in the project corridor exceeds the rate of growth citywide, though the employment growth is lower. This growth could increase travel demand and result in increased congestion on surface streets. The travel time of a transit trip between Fourth and King Streets and Chinatown would increase by 5.2 minutes when compared to existing conditions.

Corridor transit ridership demand would increase by about ~~54,580-30,900~~ daily trips between 2000 and 2030 under the No Project/TSM Alternative. The daily rail ridership would increase by approximately ~~60,030-24,600~~ trips over existing conditions, ~~but this would be offset by a reduction of~~ and the daily bus ridership would increase by approximately ~~5,450-6,300~~ trips (refer to Table 3-8). This reduction in bus increase in transit ridership would occur as a result of service changes that were implemented for the T-Third line, as well as growth in population and employment. Changes to transit services in the Corridor between the base year 2000 and the year 2030 TSM included:”

The fourth sentence, second paragraph, page 3-41 is revised as follows:

“However, capacities of the light rail vehicles operating along the Muni Metro Extension, which connects service between the Market Street subway and the T-Third Line, may experience capacity issues for limited durations during the peak period due to capacity

constraints on the segment between the Embarcadero Station and the Folsom/Embarcadero stop.”

The last two sentences, second paragraph, page 3-41 are revised as follows:

“The Muni ~~9AX/9BX~~-San Bruno Expresses are not expected to experience capacity issues, but capacity issues would arise on the 9AX-San Bruno Express, ~~with~~ Ridership on this the 9X-San Bruno Express routes is forecast to increase from approximately ~~9,320~~ 10,600 daily boardings to approximately ~~29,560~~ 23,000 daily boardings between 2000 and 2030. Table 3-10 indicates a peak period demand of about ~~5,120~~ 4,930 passengers ~~(at Fourth and Mission Streets)~~ on the 9X-San Bruno Express lines, which is a substantial increase over the 2000 ridership demand of approximately ~~570~~ 3,180 passengers.”

The last paragraph, page 3-41 and the first three paragraphs, page 3-42 are revised as follows:

“Travel times between Fourth and King Streets and the Market Street Station would be ~~6.4~~ 5.8 minutes faster and travel times between Fourth and King Streets and the Chinatown Station would be 10.0 minutes faster in the Enhanced EIS/EIR Alternative than in the No Project/TSM Alternative due to the replacement of buses traveling in mixed-flow with trains traveling in a semi-exclusive or dedicated right-of-way (refer to Table 3-11). When compared to the existing conditions the travel time between Fourth and King Streets and the Market Street Station would be ~~4.1~~ 3.4 minutes faster and ~~3.7~~ 4.8 minutes faster for the trip between Fourth and King Streets and the Chinatown Station.

As shown in Table 3-8, the proposed light rail line is expected to serve approximately ~~89,790~~ 76,300 trips per weekday in 2030, or ~~29,760~~ 51,700 more daily riders than served by the T-Third line in the No Project/TSM Alternative, primarily due to the more direct alignment providing connections to the Union Square and Market Street Stations and also due to travel time savings gained in the proposed tunnel. A large share of these travelers are persons with origins likely outside San Francisco who board the Central Subway at Fourth and King near the Caltrain Terminal ~~and alight along or board at Market Street connecting from the BART system~~, as shown in Table 3-9. Overall boardings on routes serving the Third Street Corridor are expected to increase by approximately ~~15,160~~ 21,000 over the No Project/TSM Alternative or ~~69,740~~ 51,900 over existing conditions. The increase of ~~29,760~~ 51,700 rail boardings over the No Project/TSM Alternative would be

offset ~~somewhat~~ by a decline in bus boardings in the corridor of approximately ~~14,600~~ 30,700.

The large numbers of travelers using the Enhanced EIS/EIR Alignment could exceed the capacity at some point in the future. The combined peak load on the T-Third long, T-Third short, and T-Third very short lines is predicted to be ~~19,020~~ 26,990 riders by 2030, assuming ~~56~~-minute headways (refer to Table 3-11). The service provided by two-car trains on the T-Third very short line and one-car trains on the T-Third long and short lines may need to be supplemented in the future as growth occurs to meet Muni planning capacity standards. These capacity issues may be substantially alleviated if the Caltrain Downtown Extension were implemented (the Caltrain Extension was not included in the networks because it was not part of the fiscally constrained RTP). As was the case with the No Project/TSM Alternative, demand projected for 9AX-San Bruno Express line may exceed capacity by 2030. Ridership on ~~this the 9X-San Bruno Express routes~~ is forecast to increase to ~~6,210~~ 4,930 passengers ~~(at Fourth and Mission Streets).~~”

The second through fourth paragraphs, page 3-43 are revised as follows:

“Travel times between Fourth and King Street Station and the Union Square/Market Street Station are assumed to be 1.2 minutes faster in Fourth/Stockton Alignment Option A than in the Enhanced EIS/EIR Alignment and 2.4 minutes faster between Fourth and King Streets and the Chinatown station due to the straightening out of the route and a reduction in the number of stops. ~~and~~ The travel time between the Fourth and King Street Station and the Chinatown Station would be 12.4 minutes faster than under the No Project/TSM Alternative (refer to Table 3-11). When compared to existing conditions, travel times from Fourth and King Streets would be ~~4.9~~ 4.6 minutes faster to Market Street and 7.2 minutes faster to Chinatown Station.

As shown in Table 3-8, when compared to the No Project/TSM Alternative, the Fourth/Stockton Alignment Option A is projected to serve about ~~88,840~~ 77,600 trips per weekday in 2030, or ~~28,840~~ 53,000 more daily riders than served by the T-Third line operating along The Embarcadero. This is primarily due to the more direct alignment providing connections to the Union Square/Market Street Station and also due to the travel time savings gained in the proposed tunnel. This is ~~slightly fewer passengers than served~~ 1,300 more passengers than by the Enhanced EIS/EIR Alternative, ~~as Though~~ Option A provides slightly faster travel times, ~~with~~ the reduction in the number of stops ~~increases~~

~~the walk time to stations and a more direct alignment. This out of vehicle time is often perceived by travelers to be more onerous than time spent riding in vehicles.~~ As was the case with the Enhanced EIS/EIR Alternative, a large share of the users of the Central Subway ~~are likely~~ have trip origins outside San Francisco; boarding the Central Subway at the Fourth and King Station after getting off Caltrain and ~~alighting at or~~ Market Street ~~transferring from the BART system~~ (refer to Table 3-9). When compared to the No Project/TSM Alternative, overall boardings on routes serving the Third Street Corridor are expected to increase by approximately ~~14,660–19,000~~ over the No Project/TSM Alternative or ~~69,240–49,700~~ over the existing conditions. The increase of ~~28,810–53,000~~ rail boardings over the No Project/TSM Alternative would be offset by a decline in bus boardings of approximately ~~14,150–34,000~~.

As observed in the Enhanced ESI/EIR Alternative, the large numbers of travelers using the Fourth/Stockton Alignment Option A could exceed the capacity by 2030. The combined peak load on the T-Third long, T-Third short, and T-Third very short lines is predicted to be ~~16,710–27,110~~ riders (refer to Table 3-10). To meet the Muni planning capacity standards, additional service may be required as development occurs. As previously noted, these capacity issues would be substantially alleviated if the Caltrain Downtown Extension were implemented. Once again, capacity issues may arise on the 9AX-San Bruno Express line. Table 3-10 indicates a peak load of about ~~5,270–4,680~~ passengers on the 9X-San Bruno Express lines (at Fourth and Mission Streets).”

The third to fifth paragraphs, page 3-44 and continuing on page 3-45 are revised as follows:

“For the Fourth/Stockton Alignment Option B, travel time between the Fourth and King Station and the Union Square/Market Street Station is estimated to be ~~1.3–1.4~~ minutes slower and travel time between Fourth and King Streets and the Chinatown Station would be 1.7 minutes slower than in Fourth/Stockton Alignment Option A due to the presence of an additional stop in SOMA, but travel times between Fourth and King Streets and Chinatown 10.7 minutes faster than under the No Project/TSM Alternative (refer to Table 3-11). When compared to existing conditions, travel times from Fourth and King Streets would be ~~3.6–3.2~~ minutes faster to Market Street and 5.5 minutes faster to Chinatown Station.

The light rail line in the Fourth/Stockton Alignment Option B is expected to serve approximately ~~99,230–76,600~~ trips per weekday in 2030, or ~~39,200–52,000~~ more daily

riders when compared to the No Project/TSM Alternative (refer to Table 3-8). It serves ~~40,390 more~~ 1,000 fewer passengers or one percent less than served by the light rail train in the Fourth/Stockton Alignment, Option A Alternative, primarily due to the ~~additional access provided by~~ slightly slower travel times resulting from the proposed surface station on Fourth Street. The bus ridership is projected to decline on lines serving the Corridor, such as the 9X/9AX/9BX- San Bruno Expresses, 30-Stockton, and 45-Union/Stockton, as well as other lines serving Downtown San Francisco and SOMA as a result of the Central Subway Project implementation. As was the case with the Enhanced EIS/EIR Alternative and Fourth/Stockton Alignment Option A, a large share of the users of the Central Subway are expected to have trip origins outside San Francisco, transferring to the Central Subway at Fourth and King Station (from Caltrain) ~~and alighting or~~ at Market Street transferring from the BART system (refer to Table 3-9). When compared to the No Project/TSM Alternative, overall transit boardings on routes serving the Third Street Corridor are expected to increase by approximately ~~14,840~~ 18,400 over the No Project/TSM Alternative or ~~69,420~~ 49,300 over existing conditions. The increase of ~~39,200~~ 52,000 rail boardings over the No Project/TSM Alternative would be offset by a decline of ~~24,360~~ 33,600 bus boardings.

~~The Fourth/Stockton Alignment Option B has the highest Central Subway ridership of the four alternatives evaluated and~~ By 2030 the large numbers of travelers using the Central Subway could exceed the capacity during the peak hours under the Fourth/Stockton Alignment Option B (refer to Tables 3-9 and 3-10). Table 3-10 indicates that the peak load on the combined T-Third light rail lines, is projected to be ~~19,720~~ 26,820 by 2030. Assuming the use of Muni planning capacity standards, additional rail service may be required to meet demand as development along the Corridor and to the south of San Francisco occurs. For the Fourth/Stockton Alignment Option B, the 9X-San Bruno Express demand would be less than under ~~all other~~ Alternatives 2. This is due to a shift in passengers disembarking at the Fourth and Harrison Streets and Fifth and Harrison Street stops, from the 9X-San Bruno Express and other lines, to the T-Third light rail line stop at Fourth and Brannan Streets. The 9AX-San Bruno Express line could experience capacity issues.”

Table 3-13, page 3-47, as shown on the following page, is revised to incorporate the intersection delays and level of service resulting from DPT’s revised traffic analysis completed in February 2008.

TABLE 3-13

2030 A.M. INTERSECTION LOS / AVERAGE SECONDS OF DELAY

INTERSECTION	EXISTING	NO PROJECT / TSM ALTERNATIVE	ENHANCED EIS/EIR ALTERNATIVE	FOURTH / STOCKTON ALTERNATIVE OPTION A (LPA)	FOURTH / STOCKTON ALTERNATIVE OPTION B (MODIFIED LPA)
Third Street / King Street	D/ 36.1 <u>D/ 35.8</u>	D/ 47.1 <u>E/61.0</u>	F/>80.0	F/>80.0	F/>80.0
Fourth Street / King Street	E/ 55.9	E/ 69.5	D/ 40.0 <u>E/ 62.6</u>	E/ 64.6 <u>E/64.1</u>	E/ 58.6¹ <u>E/64.1¹</u>
Fourth Street / Harrison Street	B/ 13.2 <u>B/ 13.5</u>	E/ 66.5 <u>C/28.0</u>	C/ 31.5 <u>C/34.8</u>	C/ 31.2 <u>C/34.8</u>	F/ 75.7 <u>C/34.1</u>
Sixth Street / Brannan Street	F/>80.0	F/>80.0	F/>80.0	F/>80.0	F/>80.0
Fourth Street / Bryant Street	B/ 11.8 <u>B/ 18.9</u>	B/ 11.8 <u>B/ 19.0</u>	C/ 23.8 <u>C/ 23.4</u>	C/ 28.2 <u>C/ 27.7</u>	D/ 52.5 <u>D/51.7</u>

Bold shows Project related impact.

¹ The level of service presented here is for the semi-exclusive flow option. The level of service under the mixed-flow option would be LOS D.

Source: San Francisco Department of Parking and Traffic, November 2006, February 2007, and March 2007. Revised February 2008.

Table 3-14, page 3-48, as shown on the following page, is revised to incorporate the intersection delays and level of service resulting from DPT's revised traffic analysis completed in February 2008.

The text of Alternative 1 – No Project/TSM, Operations and Cumulative Impacts on pages 3-48 to 3-50 is revised as follows to reflect the updates to the traffic analysis completed in February 2008:

“Under the No Project/TSM Alternative, the roadway network in 2030 would be similar to existing conditions, with the exception of the roadway changes within the proposed Mission Bay development. Two of the intersections, Third/King-Fourth/Harrison and Fourth/Bryant, intersections would operate at acceptable levels of service, LOS D-C and B, respectively, in the a.m. peak hour and both the Bryant and Harrison Street intersections with Fourth Street would operate at LOS C during the p.m. peak hour. As under existing conditions, many Three of the Study Area intersections would operate at LOS E, or worse, conditions during the a.m. and p.m. peak period. LOS E or F conditions would occur at the following intersections under the No Project/TSM Alternative (refer to Tables 3-13 and 3-14):

TABLE 3-14
2030 P.M. INTERSECTION LOS

INTERSECTION	EXISTING	NO PROJECT / TSM ALTERNATIVE	ENHANCED EIS/EIR ALTERNATIVE	FOURTH / STOCKTON ALTERNATIVE OPTION A (LPA)	FOURTH / STOCKTON ALTERNATIVE OPTION B (MODIFIED LPA)
Third Street / King Street	F/>80.0	F/>80.0	F/>80.0	F/>80.0	F/>80.0
Fourth Street / King Street	F/>80.0	F/>80.0	F/>80.0	F/>80.0	F/>80.0 ¹
Fourth Street / Harrison Street	B/ 19.5 <u>B/ 18.5</u>	C/ 27.6 <u>C/ 27.0</u>	D/ 35.8 <u>D/35.3</u>	E/ 65.2 <u>E/64.6</u>	F/>80.0²
Sixth Street / Brannan Street	F/>80.0	F/>80.0	F/>80.0	F/>80.0	F/>80.0
Fourth Street / Bryant Street	C/ 20.7 <u>B/19.6</u>	C/ 30.9 <u>C/30.4</u>	B/ 18.5 <u>B/ 18.2</u>	D/ 39.5 <u>C/ 24.4</u>	D/ 37.3 <u>D/ 36.9</u>

Bold shows Project related impact.

¹ The level of service presented here is for the mixed-flow and semi-exclusive option.

² The level of service presented here is for the semi-exclusive option. The level of service for the mixed-flow option would be LOS E.

Source: San Francisco Department of Parking and Traffic, November 2006, February 2007, and March 2007. Revised February 2008.

- Third Street/King Street would degrade from LOS D to LOS E during the a.m. peak hour and continue to operate at LOS F during the p.m. peak hour with increased delays due to increases in traffic volumes on all approaches,
- Fourth Street/King Street would remain at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour with increases in traffic volumes on all approaches, except on the eastbound through movement in the a.m. peak hour, where congestion would limit the traffic flows, and
- ~~Fourth Street/Harrison Street would degrade from LOS B to LOS E during the a.m. peak hour with significant increase in traffic volume to the I-80 on-ramp, and~~
- Sixth Street/Brannan Street would continue to operate at LOS F during a.m. and p.m. peak hours but would experience increased delays in the p.m. peak hour.

Mitigation Measures

Given the constrained roadway space available and limited opportunities for roadway restriping or signal enhancements, none of the LOS E and F intersections, ~~except for the~~

~~Fourth and Harrison Streets intersection~~ Third/King, Fourth/King and Sixth Brannan Streets, could be reasonably mitigated and are therefore considered cumulative, unavoidable adverse impacts. ~~At the Fourth/Harrison Streets intersection, the following mitigation measure is recommended:~~

- ~~Fourth Street/Harrison Street: In 2030, the Fourth/Harrison Street intersection would degrade to LOS E conditions during the a.m. peak hour; however, the intersection's performance could be improved to LOS B conditions by adding, via striping changes, a shared through and right turn lane from Fourth Street to Harrison Street. This improvement would require parking removal on the east side of Fourth Street, from Harrison Street to a point about 200 feet to the north for lane transition purposes. Signal timing changes would also help improve the operating conditions by allocating the appropriate amount of green time to all approaches."~~

The text of Alternative 2 – Enhanced EIS/EIR Alignment, Operations and Cumulative Impacts starting with the fourth paragraph, page 3-51 and continuing through the first paragraph, page 3-52 is revised as follows to reflect the updates to the traffic analysis completed in February 2008:

~~“Under Alternative 2, the Third and King Streets intersection would degrade from LOS D to LOS E and the Fourth and Bryant Streets intersection would degrade from LOS B to LOS C in the a.m. peak hour with the implementation of the Project. This would result in a significant project impact for the Third/King Streets intersection. The LOS operating conditions for the other three intersections would remain the same, with the Fourth/King Streets intersection experiencing slightly fewer delays than under the No Project/TSM Alternative and the Fourth/Harrison and Sixth/Brannan Streets intersections experiencing slightly higher delays. Cumulative unavoidable adverse impacts are expected to occur at Third Street/King Street intersection in the a.m. peak hour, Fourth Street/King Street (p.m. peak hour only), and Sixth Street/Brannan Street under the No Project/TSM Alternative as these intersections are expected to perform at LOS E or F conditions during the a.m. and/or p.m. peak hours.~~

Implementation of the Enhanced EIS/EIR Alignment would result in a degradation of level of service from LOS C to LOS D at the Fourth Street/Harrison Street intersection and exacerbate the congested LOS F operations during the p.m. peak hours at Third Street/King Street, Fourth Street/King Street, and Sixth Street/Brannan Street intersections, ~~but~~ At the Fourth/Bryant Streets intersection, the level of service would

improve from LOS C to LOS B with Alternative 2. Alternative 2 would make a considerable contribution to the cumulative congestion only at the Sixth/Brannan Streets intersection. At the Sixth Street/Brannan Street intersection, Alternative 2 would increase delays for vehicles accessing the I-280 on- and off-ramps. The Project would not make a considerable contribution to the cumulative adverse impacts at the other two intersections. At the Third Street/King Street intersection, the increase in the northbound left turns ~~that~~ would cause greater delays than under the No Project/TSM Alternative. At Fourth Street/King Street, the overall traffic volume and delays are ~~is~~ slightly less than the No Project/TSM Alternative, ~~but the increase in eastbound left turns could cause delays to increase.~~ ~~During the a.m. peak hours, the LOS operating conditions for two of the intersections remain the same, but would experience slightly fewer delays than under the No Project/TSM Alternative.~~ The Fourth Street/King Street intersection would operate as a constraint to traffic traveling southbound on Fourth Street.”

The text of Alternative 3 – Fourth/Stockton Alignment Option A (LPA), Operations and Cumulative Impacts, second paragraph, page 3-53 is revised as follows to reflect the updates to the traffic analysis completed in February 2008:

“Under Alternative 3A, the Third Street/King Street intersection would degrade from LOS ~~D-E~~ to LOS F in the a.m. peak hour and the Fourth Street/Harrison Street intersection would degrade from LOS C to LOS E in the p.m. peak hour with the implementation of the Project, resulting in a significant project impact. The Fourth Street/Bryant Street intersection would degrade from LOS B to LOS C in the a.m. peak hour and would remain at LOS C in the p.m. peak hour, but would still operate at an acceptable level of service. Third/King, Fourth/King, and Sixth/Brannan streets intersections are expected to continue to operate at LOS E or F in the a.m. and p.m. peak hours. Cumulative unavoidable adverse traffic impacts are expected to occur at Third Street/King Street (a.m. peak hour), Fourth Street/King Street (a.m. and p.m. peak hour), and Fourth Street/Harrison Street (a.m. and p.m. peak hour). These intersections are expected to perform at LOS E or F conditions during the a.m. and/or p.m. peak hours with or without the Fourth/Stockton Alignment Option A (LPA), but Alternative 3A would have a considerable contribution to the cumulative impacts at these intersections in the p.m. peak hour. Implementation of light rail would exacerbate the congested operations at the Fourth Street/King Street intersection during the p.m. peak hours with increases in the eastbound through volumes contributing to the increase in delays. At Third Street/King Street, the increases in

eastbound left turn movements would contribute to the increased delays at the intersection and at the Fourth Street/Harrison Street intersection, the increase in southbound right turn movements resulting from Alternative 3A would contribute to the increased congestion. At the Sixth Street/Brannan Street intersection, the LOS operating conditions would remain at LOS F during the a.m. and p.m. peak hours, but would experience slightly fewer higher delays than under the No Project/TSM Alternative with the reduction in southbound lanes.”

The text of Alternative 3 – Fourth/Stockton Alignment Option A (LPA), Mitigation Measures, first paragraph, page 3-54 is revised as follows to reflect the updates to the traffic analysis completed in February 2008:

“Project-related unavoidable adverse impacts are expected to occur at the Fourth/Harrison Streets and Third/King Streets intersections. Cumulative unavoidable adverse traffic impacts, which cannot be reasonably mitigated are expected to occur by 2030, with and without the light rail project, at Third Street/King Street, and Fourth Street/King Street, and Fourth Street/Harrison Street. Alternative 3A would have a considerable contribution to these cumulative impacts in the p.m. peak hour.”

The text of Alternative 3 – Fourth/Stockton Alignment Option B (Modified LPA), Operations and Cumulative Impacts, third paragraph, page 3-55 is revised as follows to reflect the updates to the traffic analysis completed in February 2008:

“For Alternative 3B, when compared to the No Project/TSM Alternative, the LOS at the Third Street/King Street intersection would degrade from LOS ~~D-E~~ to LOS F in the a.m. peak hour and the operation of the Fourth Street/Harrison Street intersection would degrade from ~~LOS E to LOS F in the a.m. peak hour and from~~ LOS C to LOS F in the p.m. peak hour as a result of the Project implementation. The intersection of Fourth/Bryant Streets would degrade from LOS B to LOS D in the a.m. peak hour and from LOS C to LOS D in the p.m. peak hour, but would continue to operate at acceptable levels of service. The intersections of Third/King (a.m. peak hour changes from LOS E to LOS F), Fourth/King, and Sixth Brannan would continue to operate at LOS E or LOS F in the peak hours. Cumulative unavoidable adverse impacts are expected to occur at Third Street/King Street (a.m. and p.m. peak hour), Fourth Street/Harrison Street (p.m. peak hour only), and Fourth Street/King Street (p.m. peak hour only) intersections. Implementation of light rail would exacerbate their congested operations at these locations

during the p.m. peak hours with either ~~of the~~ semi-exclusive or mixed-flow street configurations. These locations would experience greater delays in this alternative than in the No Project/TSM Alternative due to overall increases in traffic volumes, ~~as noted under Alternative 3A,~~ resulting in a considerable contribution to the cumulative impacts.

The LOS operating conditions at the critical intersections remain the same or degrade one level of service during the a.m. peak hours, and would also experience moderately longer delays than under the No Project/TSM Alternative, except at Fourth Street/King Street intersection where overall traffic volumes are less than those under the No Project/TSM Alternative. The increased traffic at the Third/King Streets intersection resulting from Alternative 3B will also result in a considerable contribution to the cumulative impacts.

The only differences in the level of service between the semi-exclusive and mixed-flow track lane options are at Fourth/King Streets and Fourth/Harrison Streets. In the a.m. peak, Fourth/King Streets performs at LOS E for the semi-exclusive track option, while it operates at LOS D in the mixed-flow option. In the p.m. peak, Fourth/Harrison Streets intersection performs at LOS F for the semi-exclusive option and LOS E for the mixed-flow option. The improvement in the level of service for the mixed-flow option could be attributed to the added capacity of the mixed-flow lane, which would be used by both the LRVs and automobile traffic.”

Table 3-16, page 3-60, as shown on the following page, is revised to correctly reflect the remaining parking spaces for the Townsend to Brannan and Bryant to Harrison Streets segments with the implementation of Alternative 3B and to incorporate new counts conducted by the Department of Parking and Traffic for the segment of Stockton Street between Washington and Jackson Streets.

The last sentence, last paragraph, page 3-62 is revised as follows:

“At the Chinatown Station on Stockton Street between Clay and Washington Streets, 6 of the ~~16-14~~ parking spaces would be lost due to the new emergency access hatch located on the west side of the street and the station emergency stairs.”

The last sentence, last paragraph, page 3-63 is revised as follows:

“The proposed location of the light rail tracks, platforms, and subway portal on Fourth Street would remove ~~82-76~~ of the 85 existing on-street parking spaces (east side and west side) under the semi-exclusive option and ~~81-73~~ spaces under the mixed-flow option between Townsend and Harrison Streets (refer to Table 3-16).”

TABLE 3-16
2030 PARKING CONDITIONS IN CORRIDOR

APPROXIMATE NUMBER OF ON-STREET PARKING SPACES								
SEGMENT	NO PROJECT / TSM ALTERNATIVE		ENHANCED EIS/EIR ALTERNATIVE		FOURTH / STOCKTON ALTERNATIVE OPTION A (LPA)		FOURTH / STOCKTON ALTERNATIVE OPTION B (MODIFIED LPA)	
Third Street - Total 92 Spaces								
	Spaces Remaining	Spaces Lost	Spaces Remaining	Spaces Lost	Spaces Remaining	Spaces Lost	Spaces Remaining	Spaces Lost
King to Townsend Streets	23	0	0	-23	23	0	23	-0
Townsend to Brannan Streets	35	0	35	0	35	0	35	-0
Brannan to Bryant Streets	34	0	0	-34	34	0	34	-0
Fourth Street - Total 85 Spaces								
King to Townsend Streets	0	0	0	0	0	0	0	-0
Townsend to Brannan Streets	20	0	20	0	2 NB/SB Portal	-18	Semi-Exclusive 0 -2	Semi-Exclusive -20 -18
							Mixed-Flow 5	Mixed-Flow -15
Brannan to Bryant Streets	36	0	0	-36	36	0	Semi-Exclusive 7	Semi-Exclusive -29
							Mixed-Flow 3 -7	Mixed-Flow -33 -29
Bryant to Harrison Streets	29	0	29	0	29	0	Both 0	Both -29
Stockton Street - Total 26 Spaces								
Geary to Post Streets	10	0	2	-8	5	-5	10	-0
Clay to Washington Streets	14	0	4	-10	8	-6	10	-4
<u>Washington to Jackson Streets</u>	<u>20</u>	<u>0</u>	<u>20</u>	<u>0</u>	<u>20</u>	<u>0</u>	<u>18</u>	<u>-2</u>
TOTAL CORRIDOR	204 <u>221</u>	0	90 <u>110</u>	-111	172 <u>192</u>	-29	Semi-Exclusive 149 <u>139</u>	Semi-Exclusive -82
							Mixed-Flow 120 <u>142</u>	Mixed-Flow -81 <u>79</u>
Source: San Francisco Department of Parking and Traffic, May 2007 and January 2008.								
NOTE: Under Alternative 3B up to three parking spaces would potentially be removed on the north side of Ellis Street to accommodate the expansion of the One Stockton Street (Apple Store) access/egress into the public sidewalk area.								

The first paragraph, page 3-64 is revised as follows:

“There would be a loss of three parking spaces on the north side of Ellis Street, west of Stockton Street, to accommodate the potential widening of the existing station access/egress at One Stockton Street (the Apple Store) and ~~four~~ six parking spaces near the Chinatown Station to accommodate emergency access to the station.”

The first sentence, second paragraph, page 3-64 is revised as follows:

“Overall, the Fourth/Stockton Alignment Option B (Modified LPA) would displace ~~82-79~~ parking spaces.”

The last sentence, first paragraph, page 3-65 is revised as follows:

“According to the results from the pedestrian counts, the existing pedestrian levels of service at all proposed station entrances, which currently operate at LOS A, would continue to operate at LOS A except on Stockton Street at Maiden Lane at the Union Square Station for Alternative 3A and along Stockton Street at the proposed Chinatown Station for Alternative 3B where sidewalks would operate at LOS B (see Table 3-17).”

Table 3-17, page 3-66 is revised as noted on the following page.:

The second to the last sentence, second paragraph, page 3-71 is revised as follows:

“Pedestrian analysis for future conditions indicates that the sidewalks on the east side of Stockton Street where the station access points are located would operate at LOS ~~A~~ B.”

The third sentence, first paragraph, page 3-78 is revised as follows:

“For Fire Station #1, the following locations will be upgraded with emergency preemption equipment: Third and Howard Streets, Third and Mission Streets, Fourth and Howard Streets, Fourth and Mission Streets, Geary Street and Grant Avenue, Geary and Powell Streets, and Geary and ~~Post-Stockton~~ Stockton Streets.”

TABLE 3-17
EXISTING AND PROJECTED PEDESTRIAN LEVEL OF SERVICE
AT PROPOSED STATION ENTRANCES

Alternative	Intersection	Corner	Street	Existing LOS	Existing 15-minute count ¹	3-hr PM Peak Period			Projected Total 15-min Ped Volume at Portal	Effective Walkway Width (ft)	Ped Unit Flow Rate (ped/min/ft)	LOS
						PM peak period count	Projected 2030 Pedestrian Volumes	Projected Ridership Volumes at Portal ²				
2	Market Street Station											
	Third/Market	SW	Market	A	431	5172	7086	3565-3250	888-861	22.00	2.61	A
	Third/Market	SE	Market	A	523	6276	8598	3565-3250	1014-987	16.50	4.10-3.99	A
	Union Square Station											
	Stockton/Maiden Lane	NE	Stockton	A	262	3144	4307	380-270	391-381	5.81	4.47-4.38	A
	Stockton/Maiden Lane	SE	Stockton	A	261	3132	4291	380-270	389-380	7.81	3.31-3.24	A
	Chinatown Station											
	Stockton between Sacramento and Clay	Mid	Stockton	A	179	2148	2943	1255-1350	350-358	7.00	3.33-3.41	A
Hang Ah Alley (south of Clay)	Mid	Hang Ah	A	27	324	444	1255-1350	142-149	11.00	0.86-0.81	A	
3A	Moscone Station											
	Fourth/Howard ³	NE	Fourth	A	121	1452	1989	0	166	7.60	1.43	A
	Fourth/Howard	NW	Fourth	A	96	1152	1578	600-570	182-179	13.00	0.93-0.92	A
	Fourth/Howard	NW	Howard	A	72	864	1184	600-570	149-146	14.00	0.71-0.70	A
	Union Square/Market Street Station											
	Stockton/Maiden Lane	NE	Stockton	A	262	3144	4307	380-1750	391-505	6.50	4.01-5.18	A-B
Stockton/Maiden Lane	SE	Stockton	A	261	3132	4291	380-1750	389-503	8.50	3.05-3.95	A-B	

TABLE 3-17 (CONTD.)
EXISTING PEDESTRIAN LEVEL OF SERVICE
AT PROPOSED STATION ENTRANCES

Alternative	Intersection	Corner	Street	Existing LOS	Existing 15-minute count ¹	3-hr PM Peak Period			Projected Total 15-min Ped Volume at Portal	Effective Walkway Width (ft)	Ped Unit Flow Rate (ped/min/ft)	LOS
						PM peak period count	Projected 2030 Pedestrian Volumes	Projected Ridership Volumes at Portal ²				
	Chinatown Station											
	Stockton between Sacramento and Clay	Mid	Stockton	A	179	2148	2943	1675-1950	<u>385408</u>	7.00	3.66-3.88	A
	Hang Ah Alley (south of Clay)	Mid	Hang Ah	A	27	324	444	1675-1950	<u>177-199</u>	11.00	1.07-1.21	A
3B	Chinatown Station											
	Stockton/Geary	NE	Geary	A	238	2856	3913	2990-2230	<u>575-512</u>	9.10	4.22-3.75	A
	Stockton/Washington	SW	Stockton	A	193	2316	3173	3130-3700	<u>525-573</u>	7.00	5.00-5.45	B
Note: Pedestrian Growth Factor = 1.37 ¹ Counts conducted April 2007. Analysis updated April 2008. ² Total projected station ridership (p.m. peak period) divided by the number of station exits. See Table E-11 (Appendix E) for total projected station ridership during the p.m. peak period. ³ Proposed station elevator location.												

Chapter 4.0 Affected Environment

The following text is added as a new paragraph following the fourth paragraph on page 4-6:

“Section 812.1.39b of the San Francisco Planning Code prohibits demolition of residential apartment units in the Chinatown Residential Neighborhood Commercial District. The Chinatown Station site at 933-949 Stockton Street is located in this zoning district and would require an amendment to the Planning Code for the demolition of the residential units at this location.”

Chapter 5.0 Environmental Consequences and Mitigation Measures

The last sentence, fourth paragraph, page 5-18 is revised as follows:

~~“If the Recreation and Parks Department does not make a~~ has concurred with the “de minimis” finding; for this alternative, which satisfies the Section 4(f) ~~report would be subject to review by the Department of Interior review requirements (see Appendix J).~~”

The text in the first sentence, second paragraph, page 5-31 is revised as follows:

“The Chinatown Stations would be centered on Clay Street at Stockton Street, and would have a mezzanine and ~~(concourse)~~ level and one platform level.”

The text of the first two sentences, last paragraph, page 5-37 is revised as follows:

“The same as for Alternative 2 above, the Chinatown Station entrance for Alternative 3A would be located on the east side of Stockton Street between Sacramento and Clay Streets in a new facility replacing an existing two-story building. The building above the new station would be limited to less than 40 feet tall to reduce possible shadows on the playground and tennis courts (Willie “Woo Woo” Wong Playground) to the east of the station ~~at~~ location.”

The text of the fourth sentence, last paragraph, page 5-39 is revised as follows:

“This underground station would have a mezzanine and ~~(concourse)~~ and one platform level for north and southbound trains.”

The last sentence, fifth paragraph, page 5-59 is revised as follows:

“Design measures to address groundwater flow to the Powell Street BART/Muni Metro Station would be incorporated into the Union Square/Market Street Station.”

The last sentence, second paragraph, page 5-60 is revised as follows:

“Design measures to address groundwater flow to the Powell Street BART/Muni Metro Station would be incorporated into the Union Square/Market Street Station.”

Chapter 6.0 Construction Methods, Impacts, and Mitigations

The second sentence, second paragraph, page 6-1 is revised as follows:

“The impacts discussion is organized by environmental topic in the same order as in Chapters ~~3.0~~ 4.0 and 5.0.”

The fifth paragraph, page 6-20 is revised as follows:

~~“Clementina Street and the adjacent~~ The lot at the southwest corner of Clementina and Fourth Streets (14,800 square feet) presently occupied by a gas station would serve as the staging area for the Moscone Station and the temporary construction shaft.”

The second sentence, fourth paragraph, page 6-34 is amended as follows:

~~“Although it is not feasible to~~ Temporary re-routing of the 30-Stockton and 45-Union/Stockton electric trolley bus lines to alternative streets during the ~~for the entire~~ construction period (six to eight months) ~~duration, temporary re-routing of these lines~~ may be required.”

The second paragraph, page 6-35 is revised as follows:

“Re-routing the 30-Stockton and the 45-Union/Stockton trolley coaches would require moving the existing overhead wires to allow the trolley buses to reach lanes not presently served, construction of new overhead wires, or temporary substitution of motor coaches for the trolley coaches; a cost that is included in the project cost estimates. Use of auxiliary power units (APUs) may be feasible for limited lengths traveling downhill on Stockton Street. ~~Moving the overhead wires would add substantial cost to the Project. Given the length of the construction and the length of travel, and the congestion in which the buses would have to maneuver, use of the auxiliary power units (APUs) would not be feasible for the buses to travel off-wire.~~”

The second sentence, sixth paragraph, page 6-35 is revised as follows:

“Overhead trolley lines for the 30-Stockton and the 45-Union/Stockton lines would need to be ~~removed temporarily~~ relocated for a period of six to eight months to facilitate installation of the shoring and decking.”

The second to last sentence, third paragraph, page 6-36 is revised as follows:

“Also, Stockton Street, between Geary and Ellis Streets may need to be closed completely for an estimated six to eight months for installation of the secant piles for the deep cut-and-cover platform section of the station.”

Table 6-2, page 6-50 is revised as shown on the following page.

TABLE 6-2
ACQUISITION AND RELOCATION REQUIREMENTS

LOCATION	REASON FOR ACQUISITION	ACQUISITION	RELOCATION	ALTERNATIVE
370 Third Street APN 3751-157	Subway alignment	60 square feet (easement underneath building)	No	Alternative 2
425 Fourth Street APN 3762-112	Subway alignment	150 square feet (easement underneath building)	No	Alternative 2
255 Third Street (Moscone Garage) APN 3735-060	Location of vent shafts for Moscone Station	Agreement/easement for placement of vent shafts on the southeast corner of building and elevators under the entrance at northwest corner	No	Alternative 2
Tehama Pedestrian Way	Location for entrance to Moscone Station on Third Street	None	Possible Vendor Relocation	Alternative 2
Hearst Garage 45 Third Street APN 3707-058	Location of vent shafts	Agreement/easement for locating vent shafts inside space in garage (30 parking spaces displaced).	No	Alternative 2
Union Square Garage APN 0308-001	Location of vent shafts and entrance to Union Square Station	Agreement for locating vent shafts and station entry in the Union Square terrace and plaza, (29 parking spaces displaced in Alternatives 2 and 3A; 34 parking spaces displaced in Alternative 3B)	No	Alternative 2 and Alternative 3A, Alternative 3B
814-828 Stockton Street APN 0225-014	Location of vent shafts and entrance to Chinatown Station	4,600 square feet (acquisition entire lot)	Yes	Alternative 2 and Alternative 3A
266 Fourth Street APN 3733-093	Location of vent shafts and entrance to Moscone Station on Fourth Street	14,800 square feet (entire gas station lot)	Yes	Alternative 3A Alternative 3B
790-798 Market Street APN 0328-002	Easement	Market Street tunnel	No	Alternative 3A Alternative 3B
801 Market Street APN 3705-048 (Old Navy)	Subway alignment	1,700 square feet easement underneath the building	No	Alternative 3A Alternative 3B
44 Stockton Street	Subway alignment	5 square feet (Easement A underneath building)	No	Alternative 3A

790-798 Market Street/2 Stockton Street APN 0328-002 and 37052-001 to 004 (Virgin Records)	Subway alignment	3,900 square feet <u>easement</u> for Option A and 3,300 square feet <u>easement</u> for Option B (Option A easement area underneath building)	No	Alternative 3A Alternative 3B
BART Entries on Market Street at Powell Station	Access to station	None – Use Agreement	No	Alternative 3A Alter native 3B
123 O’Farrell Street (Ellis/O’Farrell Garage) APN 0327-021	Location of vent shafts	Agreement for locating vent shafts in the parking garage. 24 parking spaces displaced	No	Alternative 3B
933-949 Stockton Street APN 0211-001	Location of vent shafts and entrance to Chinatown Station	10,100 square feet (acquisition of entire lot)	Yes	Alternative 3B
1455 Stockton Street	Subway alignment for North Beach Tunnel Construction Variant	1,400 square feet (easement underneath building)	No	Alternative 3A Alternative 3B
Sidewalk Basements – Various Locations	Station construction at Union Square and on Market Street between Third Street and the Montgomery Station (Alternative 2).	Revocation of permits for use of public right-of-way	No	All Alternatives
Source: PB/Wong, 2007				

The following new paragraph is added following the fifth paragraph, page 6-47 is revised as follows:

“An amendment of the Planning Code, which prohibits the demolition of residential apartment units in the Chinatown Residential Neighborhood Commercial District, would be required for the Chinatown Station. The impacts would be the same as those discussed in Section 6.5.2, Property Acquisition.”

The third sentence, paragraph five, page 6-53 is revised as follows:

“The Department of Recreation and Parks would need to authorize ~~a long-term encroachment permit~~ for the use of Union Square ~~plaza and a Section 4(f) approval~~ would ~~also be required.~~”

The following text is added at the end of the last paragraph, page 6-53:

“An amendment to the San Francisco Planning Code would be required for the demolition of the residential apartment units at this station site and the mitigation measures would be the same as those proposed for acquisition of the parcels.”

The first sentence, third paragraph, page 6-76 is revised as follows:

“Although this would not be considered a mitigation ~~measure~~ to a less-than-significant effect, if the historic building at 814-828 Stockton Street is demolished, then it would be

standard practice to perform Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation.”

The first sentence, first paragraph, page 6-79 is revised as follows:

“...Street served the immediate need for lodging and shop space by Chinese merchants in the aftermath of ~~a~~the 1906 natural disaster.”

The first sentence, second paragraph, page 6-79 is revised as follows:

“Within the block (Block 211), the three remaining buildings on the west side of Stockton Street are also contributing elements to the historic district, and other important buildings are nearby, including the Commodore School, the Chinese Methodist Episcopal Church, Presbyterian Church in Chinatown, and the Gum Moon Residence.”

The first sentence, second paragraph, page 6-82 is revised as follows:

Although this would not be considered a mitigation ~~measure to a less-than-significant effect~~, if the historic building at 933-949 Stockton Street is demolished, then it would be standard practice to perform Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation “.”

Chapter 7.0 CEQA Considerations

The last two paragraphs on page 7-8 are revised as follows to incorporate the revised traffic analysis prepared by DPT:

“Under the No Project/TSM Alternative, traffic congestion and delays would increase at all of the five intersections analyzed. The Third/King ~~and Fourth/Harrison Streets~~ intersections would degrade from LOS D to LOS E, the Fourth/King Streets intersection would continue to operate at LOS E, and Sixth/Brannan Streets intersection would experience increased delays at LOS F in the a.m. peak hour. In the p.m. peak hour, the Third/King, Fourth/King, and Sixth/Brannan Streets intersections would continue to operate at LOS F. Under all Build Alternatives, the Third/King, Fourth/King, and Sixth/Brannan Streets intersections would operate at LOS F in the a.m. or p.m. peak hours. The Project would have a cumulatively considerable contribution to the 2030 adverse cumulative impact at the following locations: Sixth/Brannan Streets intersection for Alternative 2; and Third/King, ~~and Fourth/King for Alternatives 3A and 3B~~, and

Fourth/Harrison Streets intersections for Alternative 3A and 3B (see Tables E-12 and E-13 in Appendix E). This determination was based on the examination of traffic volumes for the traffic movements which determine overall LOS intersection performance.

For Alternative 2, ~~two~~three of the five intersections analyzed would operate at LOS E or F conditions for Cumulative 2030 conditions during the a.m. peak hour and three of the five intersections analyzed would operate at LOS ~~E or~~ F conditions for Cumulative 2030 conditions during the p.m. peak hour. There would be a project-specific significant traffic impact at the Third/King intersection compared to No Project/TSM conditions due to a deterioration of LOS from ~~D-E~~E to F for the a.m. peak hour. The Project's share of future traffic growth at the Sixth/Brannan Streets intersection would constitute a cumulatively considerable contribution to adverse 2030 cumulative traffic conditions for the p.m. peak hour. Alternative 2 contributions to adverse cumulative conditions were found to be significant, in particular, as under Alternative 2 project-related traffic would constitute substantial percentages for critical volume movements that would operate with adverse conditions. As project-related traffic would represent a”

The Transit, Operation/Cumulative Impacts in Table 7-2, page 7-10 are revised as noted on the following pages.

The Traffic, Operation/Cumulative Impacts and Mitigation Measures in Table 7-2, page 7-11 and 7-12 are revised as noted on the following pages.

The Parking, Operation/Cumulative Impacts for Alternative 3B in Table 7-2, page 7-14 is revised as noted on the following pages.

The Land Use Construction Impacts for Alternative 3B in Table 7-2, page 7-18 is revised as noted on the following pages.

The Socioeconomic Construction Impacts for Alternative 3B in Table 7-2, page 7-19 is revised as noted on the following pages.

The first sentence, third paragraph, page 7-46 is revised as follows:

“For Alternative 3A, there would be a project-specific significant traffic impact at the Third/King Streets intersection compared to No Project/TSM conditions due to a deterioration of LOS from ~~D-E~~E to F for the a.m. peak hour and Fourth/Harrison Streets due

to a deterioration of LOS C to LOS ~~F~~E in the p.m. peak hour compared to No Project/TSM conditions.”

The second paragraph, page 7-47 is revised as follows:

“For Alternative 3B, the impacts would be the same as described for Alternative 3A, except ~~that at the Fourth/Harrison Streets intersection there would also be a Project-specific impact in the a.m. peak hour where level of service would degrade from LOS E to~~

TRANSIT

Operation/Cumulative	<u>Less-than-Significant Impact:</u>	<u>Less-than-Significant Impact:</u>	<u>Less-than-Significant Impact:</u>	<u>Less-than-Significant Impact:</u>
	1. Muni Metro rail service on the Embarcadero and the 9AX San Bruno express buses are projected to experience capacity issues by 2030. The capacity constraints on the Embarcadero rail line between Market Street and Folsom Street would preclude capacity improvements for the rail service.	The Central Subway rail service and the 9AX/ BX San Bruno express buses are projected to experience capacity issues by 2030.	Same as Alternative 2.	The Central Subway rail service and the 9AX San Bruno Express are is -projected to experience capacity issues by 2030.

TRAFFIC

Environmental Area/Impacts	Alternative 1 -No Project/TSM	Alternative 2 - EIS/EIR Enhanced Alignment	Alternative 3A - Fourth/Stockton Alignment Option A	Alternative 3B - Fourth/Stockton Alignment Option B
Operation/Cumulative	<i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at all of the five intersections evaluated as a result of cumulative traffic growth. Third/King (a.m. peak only). Streets intersection would degrade from LOS E to LOS F in the a.m. peak hour and would continue to operate at LOS F in the p.m. peak hour. Fourth/King, and Sixth/Brannan Streets intersections would continue to operate at LOS E or F conditions in the a.m. and p.m.	<i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at three out of the five intersections evaluated. The Project would have a significant traffic impact at the Third/King Streets intersection in the a.m. peak hour due to degradation in LOS from D-E to F when compared to the No Project/TSM Alternative and a cumulatively considerable contribution to the cumulative traffic impacts at the Sixth/Brannan Streets intersection during the p.m. peak hour in 2030.	<i>Significant Impacts:</i> Increases in traffic congestion and delays would occur in 2030 at three out of the five intersections evaluated. The Project would have a significant traffic impact at the Third/King Streets intersection in the a.m. peak hour due to a degradation in LOS from D-E to F and at the Fourth/Harrison Streets intersection in the p.m. peak hour due to a degradation in LOS from C to E when compared to the No Project/TSM Alternative. This alternative would have a	<i>Significant Impacts:</i> 1. Same as Alternative 3A, except the Project would also have a significant impact at the Fourth/Harrison Streets intersection during the a.m. peak hour when compared to the No Project/TSM Alternative and a cumulatively considerable impact on the cumulative traffic impacts at the King Street and Third Streets intersection during a.m. peak hour and the Fourth/Harrison Streets intersection during the p.m. peak hour in 2030. 2. In addition, the portal at

<p>peak hours. The intersection of Fourth and Harrison Streets would degrade from LOS B to LOS E when compared to the existing conditions.</p> <p><i>Mitigation Measure:</i> Restriping the southbound curb lane of Fourth Street to accommodate a shared through/right turn lane to Harrison Street would mitigate the impacts to LOS B resulting in a less than significant impact.</p> <p><i>Significant environmental effects which can not be avoided:</i> None of the remaining traffic impacts could be reasonably mitigated. The traffic impacts at Third/King, Fourth/King, and Sixth/Brannan Streets intersections could not be reasonably mitigated to a less-than-significant level.</p>	<p><i>Significant environmental effects which can not be avoided:</i> The traffic impacts at Third/King and Sixth/Brannan Streets intersections could not be reasonably mitigated to a less-than-significant level.</p>	<p>cumulatively considerable contribution to the adverse cumulative traffic impacts at the King Street intersections with Third and Fourth Streets and the Fourth/Harrison Streets intersection during the p.m. peak hour in 2030.</p> <p><i>Mitigation Measure:</i> Restriping the southbound curb lane of Fourth Street to accommodate a shared through/right-turn lane to Harrison Street would mitigate the impacts to LOS B resulting in a less-than-significant impact.</p> <p><i>Significant environmental effects which can not be avoided:</i> The traffic impacts at the Third/King and Fourth/King Streets intersections could not be reasonably mitigated to a less- than-significant level.</p>	<p>Fourth Street under I-80 may restrict access to the proposed bus storage facility at Perry Street and large truck movements onto Stillman Street.</p> <p><i>Mitigation Measures:</i> Same as Alternative 3A, except MTA will explore design modifications to the portal with the TJPA and Golden Gate Transit options that will permit bus access to Perry Street and truck access to Stillman Street that will to reduce the impacts to a less-than-significant level.</p> <p><i>Significant environmental effects which can not be avoided:</i> Same as Alternative 3A.</p>
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PARKING

<p>Operation/Cumulative</p>	<p>No operation or cumulative impacts.</p>	<p><u><i>Less-than-Significant Impact:</i></u> This alternative would eliminate 111 on-street parking spaces and 59 off-street parking spaces.</p>	<p><u><i>Less-than-Significant Impact:</i></u> This alternative would eliminate 29 on-street parking spaces and 29 off-street parking spaces.</p>	<p><u><i>Less-than-Significant Impact:</i></u> This alternative would eliminate 82 on-street parking spaces for the semi-exclusive option and 8179 spaces for the mixed-flow option and 59 off-street parking spaces. <u>An additional 3 spaces</u></p>
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				<p><u>may be removed on the north side of Ellis Street to accommodate emergency exiting.</u></p>
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EMERGENCY VEHICLE ACCESS

<p>Operation/Cumulative</p>	<p>No operation or cumulative impacts</p>	<p><u>Less-than-Significant Impact:</u> The introduction of a single-track median in the middle of Fourth Street would require fire trucks exiting Fire Station #8 on Bluxome Street to cross the entire trackway to travel contra-flow on Fourth Street.</p> <p><i>Improvement Measures;</i> DPT will be upgrading traffic signals with emergency vehicle preemption equipment in order to minimize the emergency response time and improve signal operations.</p>	<p><u>Less-than-Significant Impact:</u> Same as Alternative 2, except there would be a double-track median to cross in Fourth Street.</p> <p><i>Improvement Measures;</i> Same as Alternative 2.</p>	<p><u>Less-than-Significant Impact:</u> Same as Alternative 3A, except the trackway would be about 3 feet wider than under Alternative 2 <u>and with two-way operation on Fourth Street, there would be no contra-flow travel.</u></p> <p><i>Improvement Measures;</i> Same as Alternative 2.</p>
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LAND USE

<p>Construction</p>	<p>No construction impacts.</p>	<p><u>Less-than-Significant Impact:</u> Construction would not cause a change in land use patterns or neighborhood character, but would temporarily disrupt access to the adjacent uses as described under Transportation.</p> <p><i>Improvement Measures:</i></p>	<p><u>Less-than-Significant Impact:</u> Same as Alternative 2, but would have a lesser area of surface disruption.</p> <p><i>Improvement Measures:</i> Same as Alternative 2.</p>	<p><u>Less-than-Significant Impact:</u> Same as Alternative 3A, except that the surface area of disruption would be greater than under Alternative 3A <u>and an amendment of Planning Code would be required to allow the demolition of residential apartment units.</u></p>
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		Public information programs and signage will be used to minimize impacts to adjacent land uses during construction.		<i>Improvement Measures:</i> Same as Alternative 2.
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SOCIOECONOMIC (POPULATION AND HOUSING)

Construction	No construction impacts.	<u>Less-than-Significant Impact:</u> The Project would create temporary construction-related jobs that would not be expected to have a substantial effect on the regional population.	<u>Less-than-Significant Impact:</u> Same as Alternative 2.	<u>Less-than-Significant Impact:</u> Same as Alternative 2, <u>except an amendment of Planning Code would be required to allow the demolition of residential apartment units.</u>
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~~LOS F and the LOS would degrade from LOS C to LOS F in the p.m. peak hour the Project's share of future traffic growth would also constitute a cumulatively considerable contribution to adverse 2030 cumulative traffic conditions at the Third/King Streets intersection in the a.m. peak hour."~~

The first sentence, last paragraph, page 7-47 is revised as follows:

"Alternatives 2 and 3A would result in the displacement of 10 small businesses (10 or fewer employees per business) ~~and 1 or 2 residential units~~ in the Chinatown neighborhood at 814-828 Stockton Street for construction of the proposed Chinatown Station."

Chapter 8.0 Financial Feasibility

The second through fourth sentences, first paragraph, page 8-1 are revised as follows:

~~"The primary basis for this section is the MTA's Central Subway FY 2008-2009 New Starts Report, Financial Plan, which was prepared in 2006-2007, although this section also includes in addition to updated costs estimates and revenue projections for Project alternatives, which that have been provided by the MTA and its consultants. The analysis is not required for CEQA environmental review, but is presented for informational purposes as a financial plan is an important element of the federal and local project approval process. Total forecast Operating and capital costs are compared to operating and non-operating revenues from federal, state and local sources to determine the financial feasibility of the Project alternatives."~~

The last sentence, second paragraph, page 8-1 is revised as follows:

~~"The MTA expects to update the Project financial plan in September 2007-2008."~~

The fifth paragraph, page 8-4 is revised as follows:

~~"Preliminary estimates predict that utility relocations for the Central Subway will commence in 2010-2009 with heavy construction scheduled to begin in 2011-2010. The start of revenue service Completion of construction is scheduled for 2016 for Alternative 3B and 2017 for Alternative 2 and Alternative 3A."~~

The second sentence, second paragraph, page 8-5 is revised as follows:

“Alternative 3B is similar to Alternative 3A, but its cost estimates differ in part because of a shorter tunnel (with a longer surface line), four stations (the fourth is a surface platform), and a shorter (~~one year~~ six months less) construction period than the other build alternatives.”

The first sentence, last paragraph, page 8-5 is revised as follows:

“Other differences in Alternative 2 that affect the alternatives cost estimates include: operation as a surface line on both Third and Fourth Streets, south of Harrison Street; two portals (one on Third Street and one on Fourth Street) rather than one portal; a tunnel under Third Street ~~instead of in addition to~~ in addition to Fourth Street, and five stations (four underground and one surface).”

The second through the fourth sentences, paragraph one, page 8-6 are revised as follows:

~~“A second independent line (The T-Third Short Line) is anticipated to operate between Chinatown and a turnaround loop near 18th Street and the T-Third Very Short Line is planned to operate between Chinatown and Fourth and Berry Streets. Service levels are planned for single car trains on the T-Third Long and Short lines and two-car trains on the T-Third Very Short Line operating at five-six-minute peak period and 10-minute midday frequencies on each line. For Alternative 3B (the LPA as selected in February 2008), tThis would require three additional LRVs, plus one spare, for a total of four additional LRVs in 2030. For Alternative 2, it would require six additional LRVs (five peak plus one spare) and for Alternative 3A, it would require three additional LRVs (two peak plus one spare).”~~

The second through the fourth paragraphs, page 8-6 are revised as follows:

“Basis for Rail Estimating Operation and Maintenance Costs

~~Light rail operating expenses were estimated in four major cost categories: vehicle operations, vehicle maintenance, non vehicle maintenance, and general and administrative. Total MTA costs including the Central Subway Project were estimated by using FY2005 MTA data to calculate cost ratios (e.g., \$37.13 per train revenue hour for vehicle operator salaries and wages) for subcategories of the four major categories and multiplying the ratios by an appropriate cost driver (e.g., revenue car miles, number~~

~~of service and inspection yards, etc.). The MTA has assumed that rail operating and maintenance (O&M) costs increase at a rate of 3.5 percent per year on average.~~

Basis for Other Costs

~~MTA system operating expenses for motor bus, trolley bus, and cable car were estimated using the same major cost categories and methodology as rail costs. Similar to the rail costs, the MTA has assumed that bus and cable car O&M costs increase 3.5 percent per year on average.~~

The system wide Operations and Maintenance (O&M) expenses were estimated by applying the results of an O&M cost model developed for the Transit Effectiveness Project (TEP) and the FY 2009 Central Subway New Starts Report submission to the FTA.

The O&M cost model is disaggregate and resource build-up in structure, consistent with the approach suggested by the Federal Transit Administration (FTA). Line item costs are determined according to the quantity of service supplied and other system characteristics. Expenses are classified as fixed and/or variable (a driving variable drives the variable costs). Costs are broken out by class so appropriate inflation rates can be applied to project future costs for labor, fringes, and energy costs, which historically have varied significantly from each other.

The O&M cost model was calibrated and unit costs computed based on the SFMTA FY 2006 actual operating expenses, staffing costs, and levels of service provided. The following inflation factors were applied to FY 2006 dollars to forecast unit costs in year-of-expenditure dollars.

- Salaries and Wages: San Francisco Consumer Price Index - All Urban Consumers (CPI-U) + 0.5%, based on historical growth in salaries and wages
- Health Benefits: Historical growth in healthcare expenses of 10%
- Other Benefits: San Francisco CPI-U - All Items
- Fuel and Lubes: Crude Oil Price: West Texas Intermediate - Sweet Wellhead
- Materials & Supplies: San Francisco CPI-U - All Items

- Propulsion Electricity: San Francisco CPI-U - Electricity
- Other: San Francisco CPI-U - All Items

Factors That May Alter Operating Cost Estimates

~~Altering the following variables in the operating plan for the Central Subway Project would change the operating cost forecasts: number of peak cars; car revenue miles; train revenue hours; subway stations; one way route miles; and number of service and inspection yards. The O&M cost model estimates unit costs using a variety of variables, including peak vehicles, revenue bus/train hours, weekday peak revenue bus/train hours, revenue vehicle miles, ridership, manned stations, wayside or surface platforms, maintenance garages, power sub-stations, miles of trolley wire lines, and track miles. Some of these variables were broken out to associate mode-specific costs to the mode-specific variable. Any change in the value of these variables would affect the forecast of O&M costs for the baseline and the build alternatives.”~~

The first two paragraphs and Table 8-2, page 8-7 are revised as follows:

“The projected incremental operating costs for both the T-Third line (IOS) and Central Subway Alternatives are summarized in Table 8-2 in year of expenditure dollars (YOE). ~~All Project a~~ Alternatives 3A and 3B are expected to result in a net operating cost savings relative to the No Project/TSM Alternative, however, Alternative 2 would result in a net-operating increase. The 2016 figures represent the cost at the startup of the Central Subway operations, while the 2030 figures are for a selected forecast year.

Comparative Discussion

Due to a faster and more direct alignment, Alternative 3A creates an annual reduction of ~~2,400~~ 40,300 LRV car hours on the Central Subway Corridor and a system-wide annual ~~reduction~~ increase of 27,800-11,900 car hours when compared to the No Project Alternative. Alternative 3A would also reduce the number of system-wide annual bus hours by 76,400. Alternative 3B would save the same number of annual bus hours, however, it would ~~increase-reduce the~~ annual LRV car hours by ~~6,000-39,000~~ on the Central Subway Corridor while ~~reducing-increasing~~ by ~~19,400-13,200~~ system-wide LRV hours compared to the No Project/TSM Alternative. Alternative 2 would result in yields-an annual increase-decrease of 7,100-33,100 LRV car hours, a

system-wide annual ~~reduction~~ increase of ~~18,300~~ 19,100 car hours, and would reduce the number of system-wide annual bus hours by 76,400 when compared to the No Project/TSM Alternative.”

	No Project/TSM Alternative	Alternative 2	Alternative 3A	Alternative 3B
2016	\$707.9 <u>\$852.61</u>	\$693.4 <u>\$852.73</u>	\$693.0 <u>\$849.65</u>	\$693.2 <u>\$849.41</u>
2030	\$1,145.9 <u>\$1,261.49</u>	\$1,122.3 <u>\$1,262.13</u>	\$1,121.7 <u>\$1,257.77</u>	\$1,122.1 <u>\$1,258.31</u>
Difference from No Project/TSM Alternative				
2016	N/A	(\$14.5) <u>\$.011</u>	(\$14.9) <u>\$2.96)</u>	(\$14.7) <u>\$3.20)</u>
2030	N/A	(\$23.6) <u>\$0.64</u>	(\$24.2) <u>\$3.72)</u>	(\$23.8) <u>\$3.18)</u>
Note: YOE is Year of Expenditure. Source: MTA, May 2007-AECOM Consult, Inc. April 2008.				

The last paragraph, page 8-7 and continuing on to page 8-8 is revised as follows:

“A total of ~~\$432.2~~ \$473 million in state and local capital funding has been committed to the Central Subway Project. In addition, the MTA is currently seeking \$762.2 million in federal “New Starts” funding, for a total of ~~\$1,194.4~~ \$1,235 million in capital funding identified for the Project. These sources are discussed in this section. Only Alternative 3B is fully funded; and the steps that the MTA is taking to overcome the capital funding shortfalls for the other alternatives are discussed in Section 8.1.4. MTA’s funding plan for the Central Subway Project alternatives is displayed in Table 8-3.”

Table 8-3, page 8-8 is revised as follows:

Source	Amount
Federal – 5309 New Starts	\$762
State	\$306
Local	<u>\$126167</u>
Total	<u>\$1,1941,235</u>
Source: MTA Central Subway FY2008 9 New Starts Financial Plan	

The first through third sentences, third paragraph, page 8-8 is revised as follows:

“The MTA is seeking a minimum of \$762.2 million in Section 5309 New Starts funding. The MTA started receiving New Starts funds for the Central Subway Project in FY 2003.

To date, the MTA has received \$45.3 million in New Starts funds as follows: \$1.5 million in 2003; \$8.9 million in 2004; \$9.9 million in 2005; ~~and \$25 million in 2006, and \$11.74 million approved for 2008.~~ These funds were allocated for preliminary engineering and environmental review. The Central Subway Project ~~still~~ needs to complete Preliminary Engineering and enter Final Design before it is eligible to receive an FFGA, and the federal government's allocation of New Starts funding to-date does not guarantee that the Central Subway Project will receive an FFGA."

The last sentence, third paragraph, page 8-8 is revised as follows:

"In FTA's FY 2008~~9~~ New Starts Report to Congress, the Central Subway Project (Alternative 3A~~B~~) received a "Medium" Overall Rating, a "Medium" Local Financial Commitment Rating, a "Medium" Project Justification Rating, a "Medium-Low" Cost Effectiveness Rating, and a "High" Transit Supportive Land Use Rating."

The second sentence, sixth paragraph, page 8-9 is revised as follows:

~~"Muni-~~The MTA has either planned, programmed, or been awarded funding for all capital projects in the State of Good Repair CIP, which includes the capital projects needed to maintain the current level of service as well as the Central Subway Project Alternative 3A~~B~~."

Pages 8-12 and 8-13 are revised as follows:

"Operating Sources

Project Specific Transit Farebox and Non-farebox Operating Revenue Sources

~~In 2030 -~~The MTA's estimates ~~that the~~ of additional annual fare revenues ~~by~~ ~~from~~ the Central Subway Project ~~would be~~ ~~is~~ \$9.0-7.0 million ~~per year~~ for Alternative 3A, based on the estimated change in ridership and an increase in the average fare that is consistent with the MTA's estimate for inflation (~~3.2~~ 2.3 percent per year). Alternative 3B is ~~predicted~~ projected to generate slightly less incremental annual revenues of \$8.8-6.6 million and Alternative 2 is expected to generate \$11.6-5.6 million more than the No Project/TSM Alternative. The operating revenue estimates are shown in Table 8-7. MTA has assumed that the Central Subway Project will generate the same non-farebox operating revenue as the No Project/TSM Alternative."

TABLE 8-7**2030 CENTRAL SUBWAY OPERATING REVENUES (NOMINAL\$)**

	Alternative 2	Alternative 3A	Alternative 3B
Boardings with Central Subway	283,284,830	281,333,060	281,151,420
Boardings for No Project/TSM Alternative	274,528,660	274,528,660	274,528,660
Change in Boardings	8,756,170	6,804,405	6,622,764
Average Fare	\$1.33	\$1.33	\$1.33
Fare Revenue Generated by Central Subway	\$11,645,710	\$9,049,860	\$8,808,280
Note: Estimates developed using MTA methodology from MTA Central Subway FY2008 New Starts Financial Plan, Figure 15 and updated MTA boarding estimates.			

TABLE 8-7
2030 CENTRAL SUBWAY OPERATING REVENUES (YOES)

	<u>Alternative 2</u>	<u>Alternative 3A</u>	<u>Alternative 3B</u>
<u>Light Rail, Bus Trolley Bus, and Historic Streetcar</u>			
Boardings with Central Subway	<u>262,855,770</u>	<u>265,115,520</u>	<u>264,783,700</u>
Boardings for No Project/TSM Alternative	<u>259,444,570</u>	<u>259,447,570</u>	<u>259,447,570</u>
Change in Boardings	<u>3,408,200</u>	<u>5,66,950</u>	<u>5,336,130</u>
Average Fare	<u>\$0.98</u>	<u>\$0.98</u>	<u>\$0.98</u>
Fare Revenue Generated by Central Subway	<u>\$3,325,750</u>	<u>\$5,530,840</u>	<u>\$5,207,040</u>
<u>Cable Car</u>			
Boardings with Central Subway	<u>11,717,740</u>	<u>11,591,460</u>	<u>11,573,020</u>
Boardings for No Project/TSM Alternative	<u>11,329,200</u>	<u>11,329,200</u>	<u>11,329,200</u>
Change in Boardings	<u>388,540</u>	<u>262,260</u>	<u>243,820</u>
Average Fare	<u>\$5.79</u>	<u>\$5.79</u>	<u>\$5.79</u>
Fare Revenue Generated by Central Subway	<u>\$2,250,580</u>	<u>\$1,519,120</u>	<u>\$5,579,950</u>
<u>Total Change in Boardings</u>	<u>3,796,740</u>	<u>5,930,210</u>	<u>5,579,950</u>
<u>Total Fare Revenue Generated by Central Subway</u>	<u>\$5,576,330</u>	<u>\$7,049,950</u>	<u>\$6,619,330</u>
Note: YOE is Year of Expenditure. Estimates developed using MTA methodology from MTA Central Subway FY2009 New Starts Financial Plan and updated MTA boarding estimates.			

“Systemwide

The MTA has estimated the amount of revenue available for operating and maintaining the New Starts Project while maintaining the existing and proposed level of service.¹ This estimate is shown in Table 8-8. It also assumes two new revenue measures ~~requiring third party approval~~. The first of these is an increase to the parking tax of 10 percent, from the current rate of 25 percent to a proposed rate of 35 percent. ~~The MTA’s analysis assumes it would be approved by voters in FY2008 that was approved by voters in November 2007 and will begin to generate additional revenues in FY2009.~~ The second new revenue source MTA staff is currently pursuing is ~~the development of a Transit Operations fee.~~ proactive management of parking collections in on-street meters and off-street parking facilities generating an expected increase of \$30 million annually.

~~The MTA’s operating financial plan is based on its estimates of long term growth trends rather than the budget estimate or requirements for any given year.² — The MTA has~~

1 Maintaining existing service levels is required to receive a Federal New Starts Full Funding Grant Agreement.

2 ~~MTA Central Subway FY2008 New Starts Financial Plan, p.10-27.~~

DELETED TABLE 8-8
MTA 20-YEAR FINANCIAL PLAN INCLUDING CENTRAL SUBWAY ALTERNATIVE 3A
(YOY \$MILLIONS)

	Total	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23	FY24	FY25
SOURCES																					
Operating																					
Fare Revenues	\$4,152	\$131	\$159	\$159	\$159	\$179	\$179	\$179	\$197	\$197	\$197	\$216	\$216	\$216	\$236	\$236	\$236	\$259	\$259	\$259	\$284
Parking Revenues	4,847	173	177	182	190	196	202	211	218	225	234	242	249	260	268	277	288	298	307	320	330
Parking Tax Increase	198	0	0	0	9	9	10	10	10	10	11	11	12	12	12	13	13	13	13	14	15
New Cong. Mgmt/Trans. Imp. Fee	221	0	0	0	10	10	11	11	11	12	12	12	13	13	14	14	15	15	16	16	17
Charges for Service	137	5	5	5	5	6	6	6	6	6	6	7	7	7	8	8	8	8	8	8	9
Intergovernmental Revenue	3,032	91	114	151	122	125	129	133	137	141	146	151	155	160	166	171	176	182	188	194	200
Miscellaneous Revenue	755	14	29	30	31	32	33	34	35	36	37	38	40	41	42	44	45	46	48	49	51
Gen. Fund Cont. - Prop E Form.	4,150	140	154	160	167	172	178	184	189	195	202	208	215	222	229	236	244	252	260	268	276
Use of Carryforward Fund Bal.	9	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Interdepartmental Recoveries	419	15	16	16	17	17	18	18	19	20	20	21	22	22	23	24	25	25	26	27	28
Departmental Transfer Adj.	(256)	(9)	(10)	(10)	(10)	(11)	(11)	(11)	(12)	(12)	(12)	(13)	(13)	(14)	(14)	(15)	(15)	(15)	(16)	(16)	(17)
Dedicated Paratransit Funding	351	16	16	16	16	16	16	17	17	17	17	18	18	18	19	19	19	19	19	20	20
Special Revenue - TIDF	247	10	10	10	10	10	10	11	11	11	12	12	13	13	13	14	14	15	15	16	16
Total Operating Sources	18,262	586	679	720	726	764	781	802	839	859	882	923	945	970	1,015	1,040	1,068	1,117	1,144	1,175	1,229
Capital - State of Good Repair																					
Federal	2,763	106	79	111	90	173	170	160	140	165	218	206	172	167	87	84	110	126	107	132	160
State	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Local	1,232	42	50	61	89	133	95	108	58	58	95	108	25	17	50	63	11	11	45	61	51
Total Capital Sources	3,996	148	129	172	181	306	264	269	198	223	313	314	198	184	137	148	121	137	152	194	212
Total Sources	22,259	734	808	893	906	1,069	1,046	1,071	1,037	1,082	1,195	1,237	1,143	1,154	1,152	1,187	1,188	1,254	1,296	1,368	1,441
USES																					
Operating																					
Platform Salaries	4,124	128	144	150	156	162	169	176	183	190	198	206	214	222	231	240	250	260	270	281	293
Other Salaries	4,357	157	168	172	174	180	186	192	198	204	211	217	224	232	239	247	254	263	271	280	289
Fringe Benefits	6,795	114	131	144	158	174	191	210	231	254	280	308	339	373	410	451	496	545	600	660	726
Overhead	191	7	7	7	8	8	8	8	9	9	9	10	10	10	10	11	11	12	12	12	13
Non-Personal Services	3,201	109	121	125	129	133	137	141	146	151	155	160	165	171	176	182	188	194	200	206	213
Materials and supplies, incl. fuel	1,041	35	39	41	42	43	45	46	47	49	51	52	54	56	57	59	61	63	65	67	69
Capital/Facilities Expenditures	162	3	25	28	5	5	5	5	5	6	6	6	6	6	7	7	7	7	8	8	8
Services of Other Departments	1,039	36	39	40	42	43	44	46	47	49	50	52	54	55	57	59	61	63	65	67	69
Debt Service	171	8	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Allocated Charges	(381)	(14)	(14)	(15)	(15)	(16)	(16)	(17)	(17)	(18)	(18)	(19)	(20)	(20)	(21)	(22)	(22)	(23)	(24)	(24)	(25)
Appropriated Rev. - Res. & Des.	202	1	10	10	10	10	10	11	11	11	11	11	11	11	11	11	11	11	11	11	11
Repay Breda Money	7	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0
Service Plan Changes	(57)	0	0	0	0	5	5	5	5	5	5	(8)	(8)	(8)	(8)	(9)	(9)	(9)	(9)	(10)	(10)
Transfer to Unapprop. Fund Bal.	23	0	0	9	8	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Operating Uses	20,875	586	679	720	726	764	794	833	875	919	966	1,003	1,058	1,116	1,178	1,245	1,316	1,394	1,477	1,566	1,663
Capital - State of Good Repair																					
Fleet	1,684	23	16	14	10	40	42	85	38	64	154	155	72	128	108	110	83	99	114	156	174
Infrastructure	2,239	98	80	148	169	265	222	184	159	159	159	159	126	56	29	38	38	38	38	38	38
Facilities	49	7	31	10	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Projects	24	20	3	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Capital Uses	3,996	148	129	172	181	306	264	269	198	223	313	314	198	184	137	148	121	137	152	194	212
Total Uses	\$24,872	\$734	\$808	\$893	\$906	\$1,069	\$1,058	\$1,102	\$1,072	\$1,142	\$1,279	\$1,318	\$1,255	\$1,299	\$1,315	\$1,392	\$1,437	\$1,530	\$1,629	\$1,760	\$1,875
Projected Surplus (Deficit)	(\$2,613)	\$0	\$0	(\$0)	\$0	\$0	(\$12)	(\$31)	(\$36)	(\$60)	(\$84)	(\$81)	(\$113)	(\$145)	(\$162)	(\$205)	(\$249)	(\$277)	(\$333)	(\$392)	(\$434)

Note: Data reflects the combined total for the Municipal Transportation Agency, which includes Muni and DPT.

Source: MTA, 2007

~~indicated that deficits or surpluses shown in Table 8-8 are for planning purposes only, and are intended to flag years in which revenue”~~

The first paragraph, page 8-14 is revised as follows:

~~“enhancements or cost cutting measures are needed, or to alert the MTA to years in which contributions to a Contingency Fund or service enhancements may be possible. By law, the MTA must have a balanced operating budget every year.”~~

The first sentence, second paragraph, page 8-14 is revised as follows:

~~“The surplus/deficit line annual cash balance is not an indication that the MTA has the ability to build up a capital reserve or channel surplus operating revenues into capital projects.”~~

The third and fourth paragraphs, page 8-14 are revised as follows:

~~“Based on the MTA’s estimates of the capital cost for Alternative 3B, this is the only alternative that is fully funded. Both Alternative 2 and 3A would have funding shortfalls based on the current funding plan. 3A, \$424 million in local capital funding is still unidentified. The Central Subway is expected to result in a net operating surplus on a project level basis.~~

~~If the MTA identifies \$424 million in local capital funding, it estimates that it will have sufficient funds for its 20-year State of Good Repair Capital Improvement Program, which includes the capital cost of the Central Subway Project (Alternative 3A). Alternative 3B is estimated to have a lower capital cost and would therefore result in a smaller shortfall whereas Alternative 2 would result in a larger shortfall due to its higher capital cost.”~~

The first two sentences, fifth paragraph, page 8-14 are revised as follows:

~~“Systemwide, the MTA estimates that Muni will have an not experience operating shortfalls beginning in 2011 that continues through the end of the evaluation period. Although a cumulative 20-year budget deficit of \$2.6 billion is shown in Table 8-8, tThe MTA is required to have a balanced operating budget every year pursuant to the City Charter.”~~

The second sentence, second paragraph, page 8-15 is revised as follows:

~~“FTA considers the amount of Section 5309 New Starts funding available when it signs a Full Funding Grant Agreement, and outside of New York City, the largest FFGA awarded has been \$750 million.”~~

The last sentence, fourth paragraph, page 8-15 is revised as follows:

“Two general sales tax measures failed a public vote in 2004; however, the reauthorized Proposition K sales tax dedicated to transit was approved by 75 percent of voters in 2003 and Proposition A, which secured parking revenues for use by the MTA was passed in November 2007.”

The following text is added to the end of the first paragraph, page 8-16:

“In addition, as a result of Proposition E, the MTA would receive a base amount of revenue from the General Fund annually, which stabilizes the annual budgeting process.”

The last paragraph, page 8-16 and continuing to the top of page 8-17 is revised as follows:

~~“As discussed in Section 8.1.3, the Central Subway Project must improve its receive a federal New Starts Cost Effectiveness Rating from “Medium-Low” to of “Medium” from the FTA to receive a Full Funding Grant Agreement (FFGA), which is needed to and receive a significant portion of the Project’s capital funding. The MTA is working to reduce the Project’s capital cost as well as preparing an Action Plan to resolve issues that the Federal Transit Administration has indicated need to be addressed. Even with a Medium rating for Costs Effectiveness, there is no assurance of New Starts funding. The New Starts program is scheduled to expire in 2009 unless it is reauthorized by Congress, and many other projects nationwide are competing for available funds. The level of New Starts funding the MTA is seeking for the Project is unprecedented outside of New York City. Finally a New Starts FFGA does not guarantee that the annual grant for Even if the MTA receives a New Starts funding commitment form FTA, there is also a risk that New Starts funds will be appropriated by Congress in accordance with the funding schedule in the FFGA.”~~

The first sentence, third paragraph, page 8-17 is revised as follows:

“Proposition E, approved by the San Francisco voters in 2000, created a Municipal Transportation fund that is dedicated to transit operations.”

The first two sentences, fourth paragraph, page 8-17 is revised as follows:

~~“The MTA has indicated~~ if federal capital funds are not received according to the amounts or schedule as planned, or if the federal funding stream is lengthened beyond the projected cash flow, the MTA ~~would~~ will pursue additional bond financing through the City and County of San Francisco and/or financing through the SFCTA.”

The last paragraph, page 8-17 is revised as follows:

~~“Additional finance risk lies mostly in variations in interest rates, construction costs, and ridership on the existing system that could affect the total capital cost estimate. Both long term and short term borrowing are dependent on this variable. These risks can be mitigated through staging the construction of the project, controlling the growth of service, raising fares, redefining the scope of the project, and introducing short and long term financing strategies.”~~

The first paragraph, page 8-18 is revised as follows:

~~“A downside sensitivity analysis on the MTA 20-year Financial Plan, with operating and capital revenue reduced by 5 percent and operating and capital expenditures increased by 5 percent was developed. These projections increase the 20-year budget shortfall from \$2.6 billion to \$5.0 billion. An upside sensitivity analysis on the 20-year Financial Plan with revenues increased by 5 percent and expenditures decreased by 5 percent shows the MTA with a 20-year deficit of \$0.3 billion. An uncertainty analysis using a “Monte Carlo” simulation was undertaken to assess the financial risks of the project on MTA over a 30-year period. This simulation tool provides a probability distribution of potential project financing out-comes that reflects all possible outcomes of risk variable values. The Monte Carlo simulation determined that the mean of the average annual revenue required over the 30-year period of analysis is \$134 million for a mean 30-year total future capital revenue of \$4 billion required to sustain MTA programs. The MTA would not experience a deficit over this period.”~~

Chapter 9.0 Evaluation of Alternatives - Environmental Benefits

A New Starts Evaluation Process Update has been inserted at the beginning of Chapter 9.0. Refer to Volume I of the complete text.

Table 9-2, page 9-4 is revised as follows:

TABLE 9-2
SUMMARY OF MOBILITY IMPROVEMENTS EVALUATION

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
FTA Performance Measures				
Hours of Transportation User Benefits	○	●	●●	●●
Low Income Households Served	●	●	●	●
Employment Near Stations	●	●	●	●
Local Performance Measures				
Daily Linked Transit Trips	○	●	●●	●●
Exclusive ROW for Transit	○	●	●	●
Travel Time Between Selected Origins & Destinations	○	●	●	●
Average Operating Speed for Transit	●	●	●	●
Compatibility with SFTA's <i>Four-Corridor Plan</i>	○	●	●	●
● -High, ● -Medium High, ● -Medium, ○ -Medium Low, ○ -Low				

The second sentence, last paragraph, page 9-4 is revised as follows:

“The No Project/TSM Alternative would result in the greatest travel times for Muni passengers between Fourth and King Streets and Chinatown and transit ridership in the Corridor would be ~~about nine percent~~ at least 10 minutes slower than if the Central Subway was implemented.”

The text on page 9-5 and continuing to the first line of page 9-6 is revised as follows:

“these factors, the weekday transit ridership of ~~147,450~~ 124,200 passengers under the No Project/TSM Alternative would be the lowest of any alternative.

Alternative 2 - Enhanced EIS/EIR Alignment

The Enhanced EIS/EIR Alignment would have in-vehicle travel time savings of ~~6.1~~ 5.8 minutes from Fourth/King Streets to Third and Market Streets and 10.0 minutes from Fourth/King Streets to the Chinatown Station compared to the No Project/TSM Alternative due to the more direct route and the addition of 1.75 miles of exclusive right-

of-way. The Enhanced EIS/EIR Alignment would improve service to the substantial number of low income households and employment centers along the Corridor resulting in an increase of ~~15,160~~ 21,000 transit riders over the No Project/TSM Alternative to a total of ~~162,610~~ 145,200 average daily transit riders, including ~~89,790~~ 76,300 rail passengers. The split of service between the Third and Fourth Street corridors in the South of Market would slightly extend the market reach to low income households. The Enhanced EIS/EIR Alignment would be fully compatible with citywide and area-specific plans.

Alternative 3 - Fourth/Stockton Alignment Option A (LPA)

The Fourth/Stockton Alignment Option A would have the greatest travel time savings (12.4 minutes over the No Project/TSM Alternative from Fourth/King to Chinatown Station and ~~7.3~~ 7.0 minutes to Market Street) and would add approximately 1.7 miles of exclusive right-of-way for transit. The Fourth/Stockton Alignment Option A would attract about ~~14,660~~ 19,000 new weekday riders over the No Project/TSM Alternative, for a total average weekday ridership of ~~162,110~~ 143,200, which would be slightly lower than the ridership increases achieved with the Enhanced EIS/EIR Alignment. This would include ~~88,840~~ 77,600 rail passengers. This alternative would see the greatest increase in rail ridership among the alternatives. While, the Fourth/Stockton Alignment Option A would not serve quite as many low income households and employment centers as the Enhanced EIS/EIR Alignment, the benefits in travel time savings would partially offset the potential negative of a smaller service area. This alternative would be fully compatible with the *Four Corridor Plan* and other citywide and area-specific plans.

Alternative 3 - Fourth/Stockton Alignment Option B (Modified LPA)

The Fourth/Stockton Alignment Option B would have a travel time savings of 10.7 minutes from Fourth/King Streets to Chinatown Station and ~~6.0~~ 5.6 minutes to Market Street when compared to the No Project/TSM Alternative. Similar to Option A, approximately 1.7 miles of new exclusive transit right-of-way would be added to the Muni System and approximately ~~14,840~~ 18,400 new daily transit riders would be added to the Corridor, for an average daily ridership of ~~162,290~~ 142,600 passengers in the Corridor including ~~99,230~~ 76,600 rail passengers. This alternative would see the greatest increase in rail ridership among the alternatives.”

Table 9-4, page 9-7 is revised as shown on the following page:

TABLE 9-4
SUMMARY OF ENVIRONMENTAL BENEFITS EVALUATION

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
FTA Performance Measures				
Change in Regional Air Pollutant Emissions	○	●	●	●
Change in Greenhouse Gases	○	●	●	●
Change in Regional Energy Consumption	○	●	●	●
EPA Air Quality Designation	○	○	○	○
Local Performance Measures				
Partial and Full Property Acquisitions	●	○	○	○
Affected Parkland/Cultural Sites	●	○	○	●
Visual, Noise, and Vibration	●	○	●	●
Displaced Parking During Construction	●	○	○	○
● -High, ● -Medium High, ● -Medium, ○ -Medium Low, ○ -Low				

Table 9-5, page 9-9 is revised as follows:

TABLE 9-5
CRITERIA FOR EVALUATING OPERATING EFFICIENCIES

Criteria/Objective	Performance Measure
FTA Criteria	
Operating Efficiencies	Operating Cost per Passenger Mile
Local Criteria	
Maximize Transit Operating Efficiency While Accommodating 2030 Demand	Operating Cost per Passenger Operating Cost per <u>Revenue</u> Bus Hour Operating Cost per <u>Revenue</u> Train Hour

Tables 9-6 and 9-7, page 9-10 are revised as follows:

TABLE 9-6
OPERATING EFFICIENCIES - 2030

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
FTA Performance Measures				
Systemwide Operating Cost per Passenger Mile ⁽¹⁾	\$0.57-\$1.24	\$0.58-\$1.25	\$0.57-\$1.24	\$0.57-\$1.24
Local Performance Measures				
Systemwide Operating Cost per Passenger ⁽¹⁾	\$1.82-\$2.34	\$1.63-\$2.31	\$1.56-\$2.29	\$1.52-\$2.29
Bus Operating Cost per <u>Revenue</u> Bus Hour ⁽²⁾	\$254.00-\$140.02	\$209.00-\$140.34	\$209.00-\$140.32	\$209.00-\$140.32

Light Rail Operating Cost per Revenue Train Hour ^(2,3)	\$303.00-\$248.20	\$298.00-\$260.32	\$305.00-\$259.98	\$299.00-\$259.84
Sources: 2030 base system ridership – San Francisco Model, January 2007 2008, and MTA, May 2007 AECOM Consult Inc., March 2008.				
Notes: (1) Includes Cable Car mode.				
(2) Excludes Cable Car mode				
(3) Includes Historic Street Cars				

TABLE 9-7
SUMMARY OF OPERATING EFFICIENCIES

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
FTA Performance Measures				
Systemwide Operating Cost per Passenger Mile	●	○	●	●
Local Performance Measures				
Systemwide Operating Cost per Passenger	○	○	●	●●
Bus Operating Cost per Revenue Bus Hour	●●	●○	●	●
Light Rail Operating Cost per Revenue Train Hour	●●	●○	●○	●
● -High, ● -Medium High, ○ -Medium, ○ -Medium Low, ○ -Low				

The last sentence, last paragraph, page 9-10 is revised as follows:

“The No Project/TSM Alternative would have the highest operating cost per passenger (~~\$1.82-\$2.34~~), ~~and but would have the highest-lowest~~ operating cost per revenue bus hour (~~\$254.00-\$140.02~~) and per revenue train hour (~~\$248.20~~) when compared to all the Build Alternatives ~~and would have a higher operating cost per train hour (\$303.00) than the Enhanced EIS/EIR or Fourth/Stockton Option B alignments.~~”

The last paragraph, page 9-10 and continuing as the first paragraph on page 9-11 is revised as follows:

“The Enhanced EIS/EIR Alternative would provide faster and more reliable transit service than the No Project/TSM Alternative, ~~generally without a some~~ loss in operating efficiency. The operating costs per passenger (~~\$1.63-\$2.31~~) would go down, while the operating costs per revenue bus hour (~~\$209.00-\$140.34~~), and per revenue train hour (~~\$298.00 \$260.32~~) would ~~all go down-increase~~ when compared to the No Project/TSM. The service would be of higher quality and capacity compared to the No Project/TSM Alternative; however, the operating cost per passenger (~~\$0.58-\$1.25~~) would marginally increase.”

The second and third paragraphs page 9-11 are revised as follows:

“Alternative 3 - Fourth/Stockton Alignment Option A (LPA)

The Fourth/Stockton Alignment Option A would provide some systemwide improvements in operational efficiency compared to both the No Project/TSM Alternative and the Enhanced EIS/EIR Alternative. The operating cost per passenger (~~\$1.56~~ \$2.29) would be lower, ~~and~~ the operating cost per passenger mile (~~\$0.57~~ \$1.24) about the same, and the operating cost per bus hour (~~\$209.00~~ \$140.32) would be ~~about the same~~ slightly lower than Alternative 2, though higher than the No Project/TSM Alternative, with no perceptible decrease in operating efficiency. ~~This alternative would have t~~The highest operating cost per revenue train hour would be \$259.98, which falls between the other two Build Alternatives.

Alternative 3 - Fourth/Stockton Alignment Option B (Modified LPA)

The Fourth/Stockton Alignment Option B ~~has the greatest overall operating efficiencies are comparable to Alternative 3A for passenger and passenger mile costs and for bus operating costs per revenue bus hour. With the highest ridership, this alternative generates the lowest operating cost per passenger (\$1.52). The operating costs per passenger mile (\$0.57) and per bus hour (\$209.00) are comparable to other Build Alternatives. The~~ This alternative has the lowest operating cost per revenue train hour (\$299.00-\$259.84) falls just below the Enhanced EIS/EIR Alignment and is lower by \$6.00 than for Option A of all the Build Alternatives.”

The second sentence, first paragraph, including footnote 2, page 9-12 is revised as follows:

“The Table 9-9 incremental costs were calculated from Operations and Maintenance (O&M) forecasts developed in ~~2006-2008~~ consistent with all of the evaluations performed for the SEIS/SEIR.²

² Updated Operations & Maintenance costs have been performed for Alternative 3B (Modified Locally Preferred Alternative) only and are included in the Fiscal Year 2009 New Starts Report. The Fiscal Year 2007 numbers used in Table 9-9 are to be only used for comparing one alternative against another. These are different from the numbers submitted in the Fiscal Year 2009 New Starts Report. The New Starts Report reflects the most current ridership numbers and cost effectiveness for the modified LPA (Alternative 3B) and should be used for all other circumstances. See Appendix H for ~~updated~~ further discussion of cost-effectiveness numbers.”

Table 9-9, page 9-12 is revised as follows to incorporate updated cost effectiveness benefits:

TABLE 9-9
SUMMARY OF COST EFFECTIVENESS

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives			
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B	
		FY 2007 9 New Starts	FY 2007 9 New Starts	FY 2007 9 New Starts	FY 2009 New Starts
Incremental Cost per Hour of Transportation System User Benefit	--	\$33.58 <u>\$30.37</u>	\$22.73 <u>\$21.12</u>	\$18.36	\$20.60 <u>\$21.24</u>
● High, ● Medium High, ● Medium, ● Medium Low, ○ Low					
Note: An updated cost effectiveness index was calculated for Alternative 3B as part of the Fiscal Year 2009 New Starts Report submitted to FTA in September 2007. The cost-effectiveness index for all other alternatives is based on the Fiscal Year 2007 2009 New Starts Report. For the Final SEIS/SEIR, the cost effectiveness index will be updated for all alternatives.					

The last paragraph, page 9-12 is revised as follows:

“Alternative 2 has the highest incremental cost per hour of transportation system-user benefit (~~\$33.58~~ \$30.37) of all of the build alternatives and would be assigned a low cost effectiveness rating based on the FTA criteria. The MTA 2030 projected systemwide ridership would be ~~higher~~ lower in Alternative 2 than in other alternatives, but the Central Subway Corridor ridership would be higher. ~~and~~ ~~the~~ MTA revenues generated from this alternative would ~~also be highest~~ lowest among alternatives; however, relative operating costs per revenue bus and train hour for this alternative are also ~~high~~ low, though without comparable user benefits. This alternative would generate a higher level of Central Subway ridership than either Alternative 3A or 3B, but would ~~generate lower ridership on the Central Subway line than under Alternative 3B and would result in the highest travel times of all Build Alternatives.~~”

The first two paragraphs, page 9-13 are revised as follows:

“Alternative 3 - Fourth/Stockton Alignment Option A (LPA)

Alternative 3A has an incremental cost per hour of transportation system-user benefit (~~\$22.73~~ \$21.12), which is an improvement over Alternative 2. This cost would receive a medium cost-effectiveness rating based on FTA criteria. This alternative would have the lowest projected ridership on the Central Subway line of all Build Alternatives, ~~and would rank behind Alternative 2~~ but would rank the highest in systemwide MTA ridership and projected revenues. While travel times are the fastest for this alternative, by providing only three stations, the accessibility to the system is less with Alternative 3A.

Alternative 3 - Fourth/Stockton Alignment Option B (Modified LPA)

Alternative 3B has ~~the lowest~~ a slightly higher incremental cost per hour of transportation system-user benefit (~~(\$18.36-\$21.24)~~) than Alternative 3A, but would also achieve a medium rating, ~~but would rank above the other two Build Alternatives~~ with respect to the FTA cost-effectiveness criteria. This alternative achieves the second highest projected ridership of all Build Alternatives, falling just below Alternative 3A. It improves by improving travel times over the No Project/TSM Alternative and Alternative 2 and also provides a high level of system accessibility. ~~The resulting user benefits offset the higher systemwide costs and lower systemwide revenues projected for Alternative 3B.~~ These factors give Alternative 3B the best overall performance in operating efficiencies (refer to Table 9-6).

Table 9-13, page 9-16 is revised as follows:

TABLE 9-13
SUMMARY OF OTHER LOCAL EVALUATION FACTORS

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
Travel Time from Fourth/King to Market/Third/Fourth	○	●●	●	●●
Travel Time from Fourth/King to Stockton/Washington	○	○	●	●
Parking supply and on-street loading zones on or near Third/Fourth Streets and Stockton Street	●	○	●	○
Community Acceptance and Political Support	○	○	●	●
● -High, ● -Medium High, ○ -Medium, ○ -Medium Low, ○ -Low				

The second and third sentences, third paragraph, page 9-17 are revised as follows:

“The Fourth/Stockton Alignment Option B would result in a net loss of 82 on-street parking spaces along the Central Subway Corridor (79 with mixed-flow operations) and 59 off-street spaces at the Ellis/O’Farrell and Union Square garages. In terms of the community acceptance and political support objective, the Fourth/Stockton Alignment Option B likely have the greatest public support of the Build Alternatives as it provides the highest level of ridership, ~~and~~ the greatest level of accessibility by improving the direct

connections between Visitacion Valley and Chinatown, and minimizes the impact on park lands.”

Table 9-15, page 9-18 is revised as follows:

**TABLE 9-15
SUMMARY OF LOCAL FINANCIAL COMMITMENT**

Performance Measures	No Project/TSM Alternative	Central Subway Alternatives		
		Enhanced EIS/EIR Alignment	Fourth/Stockton Alignment Option A	Fourth/Stockton Alignment Option B
FTA Performance Measures				
Stability and Reliability of Capital Financing Plan	--	●	●	●
Stability and Reliability of Operating Financing Plan	○	●	●	●
Local Share to Project Costs	--	●	●	●
Capital Costs Compared to Funding	--	●	●	●●
Operating Costs Compared to Funding	●	●	●	●
●-High, ●-Medium High, ●-Medium, ○-Medium Low, ○-Low				

The second and third sentences, last paragraph, page 9-19 are revised as follows:

~~“Funding for this alternative would fall just short of the funds required to implement the Project. Additional funds would need to be secured to address escalation costs for implementation of the Project (see Chapter 8.0, Financial Feasibility, for a more detailed discussion of the Project cost escalation factors). This alternative is the only alternative that is fully funded.”~~

Chapter 10.0 Section 4(f)

The second and third paragraphs, page 10-29 are revised as follows:

“Noise, dust, and vibration would temporarily affect the recreational enjoyment of the eastern portion of Union Square until the initial station excavation is decked over and construction activities can occur below the surface. It would take approximately two months for the ~~station to be excavated and~~ excavation to be decked over.

The decked cut and cover excavation of the subway station at Union Square would require the closure of two lanes (out of four) on Stockton Street for the duration of station

construction, approximately ~~66~~36 months. Spoils generated from excavation of Union Square Station and the guideway tunnels north of Union Square would be hauled to surface streets for off-site disposal. Overall construction at Union Square for Alternative 2 is ~~66~~48 months. No portion of the park would be used as a construction staging area.”

The bullet at the bottom of page 10-31 is revised as follows:

- “The sidewalk on the western side of Stockton Street along the Square would be closed for the duration of station construction (~~66~~54 months).”

The last sentence, second paragraph, page 10-32 is revised as follows:

“The entire duration of construction for this alternative would be 66 months.”

The last sentence, second paragraph, page 10-34 is revised as follows:

“The overall construction duration for the alternative is ~~52~~60 months.”

The last sentence, first paragraph, page 10-37 is revised as follows:

“Excavation, ground support, and structural work for the station would require approximately ~~66~~36 months.”

The second to last sentence, first paragraph, page 10-39 is revised as follows:

“Construction of the Chinatown Station and tail track tunnel would require approximately ~~66~~36 months.”

The first sentence, last paragraph, page 10-39 is revised as follows:

“The ~~north-east~~ elevation wall of the demolished building would be left in tact or a temporary noise barrier would be constructed during the subway station construction to minimize noise and dust effects on the adjacent alleyway and playground.”

The last sentence, second paragraph, page 10-42 is deleted as noted below:

~~“Concurrence from the SHPO of “de minimis” effects has been requested.”~~

The second to the last sentence, first paragraph, page 10-43 is revised as follows:

“If impacts to a resource have been determined “de minimis,” the Section 4(f) evaluation process is considered complete for that resource once concurrence is obtained from officials with jurisdiction over the Park, recreation area, ~~and from the SHPO [concurrence is needed].”~~

The last sentence, second paragraph, page 10-43 is replaced with the following text:

~~“ These avoidance alternatives would be deleted from this section of the Final SEIS/SEIR if concurrence for “de minimis” impacts occurs between Draft and Final SEIS/SEIR. The Recreation and Parks Commission concurred with the de minimis finding on February 21, 2008 (see Appendix J), therefore the following avoidance alternatives are not applicable.”~~

The following text is added after the third sentence, first paragraph,, page 10-44:

“The preferred alternative was also reviewed with the Union Square Association and the Union Square Merchants Association, and at public meetings.”

The last sentence, second paragraph, page 10-46 is revised as follows:

“Measures to minimize harm to Section 4(f) resources will be ~~finalized~~included in the Final SEIS/SEIR and will be included in the Mitigation and Monitoring Plan and in construction specifications and plans for the project.”

The potential feasible and prudent alternatives for Washington Square identified in Table 10-6, page 10-48 are revised as follows:

Washington Square	Local landmark	Air quality, vibration and noise impacts associated with construction. Access limited temporarily on the Columbus Avenue side of Park.	<u>Consider relocation of Relocate</u> excavation shaft to the North or South of park along Columbus Avenue	Minimize noise and dust impacts with buffer walls; off-haul during non-peak hours
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The last sentence, second paragraph, page 10-49 is deleted as noted below:

~~“Concurrence with this finding by the SHPO and City Historic Preservation Officer has been requested.”~~

The last sentence, fourth paragraph, page 10-49 is revised as follows:

“Detailed measures to minimize harm to historic resources ~~will be developed during~~ are part of the Final Section 106 and SEIS/SEIR phase.”

Chapter 11.0 Coordination and Consultation

The following Community Outreach Presentations and Briefings are added to the end of Table 11-3, page 11-7:

<u>Asian Heritage Street Celebration</u>	<u>05-1-2007</u>	<u>Folsom Street near Fourth Street</u>
<u>S.F. Arts Commission Civic Design Committee</u>	<u>05-21-2007</u>	<u>25 Van Ness Avenue, Suite 70</u>
<u>S. F. Arts Commission Visual Arts Committee</u>	<u>06-11-2007</u>	<u>25 Van Ness Avenue, Suite 70</u>
<u>SPUR</u>	<u>06-20-2007</u>	<u>312 Sutter Street, 5th Fl</u>
<u>Market Street Association, Board of Directors</u>	<u>06-25-2007</u>	<u>SMWM Offices, 989 Market, 3rd Fl</u>
<u>Metropolitan Transportation Commission</u>	<u>06-27-2007</u>	<u>MTC Offices</u>
<u>Transportation Forum with Mayor Newsom</u>	<u>06-30-2007</u>	<u>Jean Parker Elementary School 840 Broadway at Powell Street</u>
<u>Sierra Club Executive Board</u>	<u>07-16-2007</u>	<u>SPUR 312 Sutter Street, Suite 500</u>
<u>Senior Action Network, Pedestrian Safety Committee</u>	<u>07-18-2007</u>	<u>965 Mission Street</u>
<u>Mayor’s Pedestrian Safety Advisory Council</u>	<u>07-23-2007</u>	<u>City Hall, Room 408</u>
<u>Women’s Transportation Seminar</u>	<u>7-26-2007</u>	<u>Atrium, 101 California</u>
<u>Building Owners & Managers Association – Gov’t & Public Affairs Committee</u>	<u>08-01-2007</u>	<u>233 Sansome Street, 8th Floor</u>
<u>SF Chamber of Commerce-Public Policy Forum</u>	<u>08-09-2007</u>	<u>235 Montgomery, 12th Fl</u>
<u>Chinatown Station Location Site Meeting</u>	<u>08-09-2007</u>	<u>City Hall</u>
<u>Bayview District Advisory Council Meeting</u>	<u>08-10-2007</u>	<u>Bayview Police Station 201 Williams St.</u>
<u>S.F. Recreation & Park Commission</u>	<u>08-16-2007</u>	<u>City Hall, Room 416</u>
<u>Central Subway Community Advisory Group Meeting</u>	<u>08-22-2007</u>	<u>SFMTA, One S. Van Ness Ave., 3rd Floor</u>
<u>District 3 Democratic Club Transportation Forum</u>	<u>09-10-2007</u>	<u>Bocce Café 478 Green Street at Grant</u>
<u>North Beach Chamber of Commerce, Board of Directors Meeting</u>	<u>09-11-2007</u>	<u>Citibank Building, 580 Green St, Mezzanine</u>
<u>Telegraph Hill Dwellers</u>	<u>09-11-2007</u>	<u>TBD</u>
<u>S.F. Convention & Visitors Bureau Executive Staff</u>	<u>09-14-2007</u>	<u>Central Subway Project Office</u>
<u>SF Immigration Rights Summit</u>	<u>09-15-2007</u>	<u>Bill Graham Civic Center Auditorium</u>
<u>Live Chinese Radio Interview with Nat Ford</u>	<u>09-18-2007</u>	
<u>SFMTA Board of Directors Meeting</u>	<u>09-18-2007</u>	<u>City Hall, Room 400</u>
<u>Autumn Moon Festival</u>	<u>09-23-2007</u>	<u>Booth is in Chinatown</u>
<u>RENEWSF Board of Directors (Revitalize and Energize the Northeast and Waterfront of San Francisco)</u>	<u>10-04-2007</u>	<u>Central Subway Project Office</u>
<u>Mary Peters, US DOT Secretary Project Briefing</u>	<u>10-16-2007</u>	<u>TBA</u>
<u>Transportation Authority, Plans & Programs Committee</u>	<u>10-16-2007</u>	<u>City Hall, Room 263</u>
<u>SF Landmarks Preservation Advisory Board</u>	<u>10-17-2007</u>	<u>City Hall, Room 400</u>
<u>Environmental Document Release Press Conference</u>	<u>10-17-2007</u>	<u>Four Seas Restaurant 731 Grant Avenue</u>
<u>SOMA/Union Square/Downtown Community Meeting</u>	<u>10-30-2007</u>	<u>Pacific Energy Center 851 Howard Street</u>
<u>Yerba Buena Alliance (Community Meeting)</u>	<u>11-01-2007</u>	<u>UCB Extension 965 Third Street</u>
<u>SF Planning Commission</u>	<u>11-01-2007</u>	<u>City Hall, Room 400</u>
<u>Chinatown Families Economic Self-Sufficiency Coalition</u>	<u>11-02-2007</u>	<u>17 Walter Lum Place (the alleyway facing Portsmouth Square).</u>
<u>SF Landmarks Preservation Advisory Board</u>	<u>11-07-2007</u>	<u>City Hall, Room 400</u>
<u>Chinatown Station Site Workshop</u>	<u>11-07-2007</u>	<u>City Hall</u>

<u>Chinatown/North Beach Community Meeting</u>	<u>11-08-2007</u>	<u>Gordon J. Lau Elementary School 950 Clay Street</u>
<u>Central Subway Community Advisory Group Meeting</u>	<u>11-13-2007</u>	<u>SFMTA Office One South Van Ness, 3rd Main Conference</u>
<u>SF Convention & Visitors Bureau Board of Directors Meeting</u>	<u>11-14-2007</u>	<u>Firehouse, At Fort Mason Entrance at Marina Blvd & Buchanan Street</u>
<u>SF Planning Commission Meeting</u>	<u>11-15-2007</u>	<u>City Hall, Room 400</u>
<u>Senator Boxer's Aide Project Visit</u>	<u>11-16-2007</u>	
<u>Chinese Consolidated Benevolent Association</u>	<u>12-01-2007</u>	<u>843 Stockton Street</u>
<u>Chinatown Presbyterian Church</u>	<u>12-02-2007</u>	
<u>Central Subway Art Program Presentation</u>	<u>12-12-2007</u>	<u>Chinese Cultural Foundation</u>

The following name is added to the Chinatown representation from the Community Advisory Group:

“David Chiu - Grassroots Enterprise”

APPENDICES

The following three appendices are added following Appendix H:

- I. MITIGATION MONITORING AND REPORTING PROGRAM**
- J. SECTION 4(F) “DE MINIMIS” CONCURRENCE LETTERS FROM RECREATION AND PARKS DEPARTMENT AND FTA**
- K. SHADOW ANALYSIS, ALTERNATIVE 3B, CHINATOWN STATION**

See Volume I for text of new appendices.

Tables E-1 through E-4, pages E-4 to E-7 and Table E-7, page E-10 are revised as noted on the following pages.

Tables E-9 to E-11, pages E-11 to E-13 are revised as noted on the following pages.

TABLE E-1
ESTIMATED WEEKDAY A.M. PEAK HOUR TRANSIT RIDERSHIP COMPARISON

LRT/BUS LINE	2000	2030 NO PROJECT /TSM	2030 Enhanced EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
CORRIDOR BOARDINGS					
RAIL					
T Long Line (1)	n/a	8,050 5,650	8,400 6,350	8,370 6,460	9,120 6,320
T Short Line	n/a	n/a	5,050 3,240	4,670 3,200	5,520 3,190
T Very Short Line	n/a	n/a	2,900	2,850	2,850
Subtotal		8,050 5,650	13,450 12,490	13,040 12,510	14,640 12,360
BUS					
Line 15 ⁽²⁾	3,680 3,930	n/a	n/a	n/a	n/a
Lines 9X, 9AX, 9BX	4,620 1,720	5,100 3,320	5,540 3,290	5,090 2,970	3,880 3,070
Lines 30, 45 ⁽³⁾	12,700 7,220	5,010 10,950	3,170 5,070	3,310 5,060	3,220 5,060
Subtotal	14,320 12,870	10,110 14,270	8,710 8,360	8,400 8,030	7,100 8,130
TOTAL IN CORRIDOR:	14,320 12,870	18,160 19,920	22,160 20,850	21,440 20,540	21,740 20,490
Increase Over Existing:	0	3,840 7,050	7,840 7,980	7,120 7,670	7,420 7,620
Increase Over No Project/TSM:	0	0	4,000 930	3,280 620	3,580 570
SYSTEM BOARDINGS					
RAIL	20,590 19,620	32,360 26,690	35,650 36,760	37,060 37,540	38,180 37,390
BUS	61,350 70,200	68,500 76,720	65,590 70,530	64,060 70,460	62,740 70,480
TOTAL SYSTEM:	81,940 89,820	98,160 103,710	101,240 107,290	101,120 108,000	100,920 107,870
Increase Over Existing:	0	16,220 13,980	19,300 17,470	19,180 18,180	18,980 18,050
Increase Over No Project/TSM:	0	0	3,080 3,580	2,960 4,290	2,760 4,160
n/a Not Applicable Source: San Francisco Model, January 2007. Revised January 2008. Notes: ¹ Central Subways T-Third long-line to Visitacion Valley and T-Third short-line to 18 th and Third Streets. ² 15-Third Line shifts to 9X-San Bruno or to the T-Third line. ³ 45 Union/Stockton extended into Mission Bay.					

TABLE E-2
ESTIMATED WEEKDAY P.M. PEAK HOUR TRANSIT RIDERSHIP COMPARISON

LRT/BUS LINE	2000	2030 NO PROJECT /TSM	2030 Enhanced EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
CORRIDOR BOARDINGS					
RAIL					
T Long Line (1)	n/a	<u>6,720</u> <u>4,290</u>	<u>7,370</u> <u>4,980</u>	<u>7,270</u> <u>5,040</u>	<u>7,850</u> <u>4,960</u>
T Short line	n/a	n/a	<u>4,530</u> <u>2,630</u>	<u>4,080</u> <u>2,640</u>	<u>4,810</u> <u>2,620</u>
T Very Short Line	n/a	n/a	2,370	2,350	2,350
Subtotal		<u>6,720</u> <u>4,290</u>	<u>11,900</u> <u>9,980</u>	<u>11,350</u> <u>10,030</u>	<u>12,660</u> <u>9,930</u>
BUS					
Line 15(2)	<u>3,500</u> <u>7,510</u>	n/a	n/a	n/a	n/a
Lines 9X, 9AX, 9BX	<u>1,300</u> <u>3,180</u>	<u>3,160</u> <u>1,980</u>	<u>3,190</u> <u>1,820</u>	<u>3,630</u> <u>1,730</u>	<u>2,490</u> <u>1,770</u>
Lines 30, 45(3)	<u>11,190</u> <u>5,020</u>	<u>4,710</u> <u>8,560</u>	<u>2,550</u> <u>3,860</u>	<u>2,640</u> <u>3,810</u>	<u>2,500</u> <u>3,790</u>
Subtotal	<u>12,490</u> <u>15,170</u>	<u>7,870</u> <u>10,540</u>	<u>5,740</u> <u>5,680</u>	<u>6,270</u> <u>5,540</u>	<u>4,990</u> <u>5,560</u>
TOTAL IN CORRIDOR:	<u>12,490</u> <u>15,170</u>	<u>14,590</u> <u>14,830</u>	<u>17,640</u> <u>15,660</u>	<u>17,620</u> <u>15,570</u>	<u>17,650</u> <u>15,490</u>
Increase Over Existing:	0	<u>2,100</u> <u>2,340</u>	<u>5,150</u> <u>3,170</u>	<u>5,130</u> <u>3,080</u>	<u>5,160</u> <u>3,000</u>
Increase Over No Project/TSM:	0	0	<u>3,050</u> <u>830</u>	<u>3,030</u> <u>740</u>	<u>3,060</u> <u>660</u>
SYSTEM BOARDINGS					
RAIL	<u>18,780</u> <u>16,690</u>	<u>27,130</u> <u>21,780</u>	<u>30,840</u> <u>29,600</u>	<u>31,350</u> <u>30,120</u>	<u>32,620</u> <u>30,120</u>
BUS	<u>49,950</u> <u>51,400</u>	<u>56,100</u> <u>58,830</u>	<u>57,650</u> <u>52,250</u>	<u>54,750</u> <u>52,310</u>	<u>53,340</u> <u>52,260</u>
Increase Over Existing:	0	<u>14,510</u> <u>12,520</u>	<u>19,760</u> <u>13,760</u>	<u>17,370</u> <u>14,430</u>	<u>17,230</u> <u>14,290</u>
Increase Over No Project/TSM:	0	0	<u>5,250</u> <u>1,240</u>	<u>2,860</u> <u>1,910</u>	<u>2,720</u> <u>1,770</u>
n/a Not Applicable Source: San Francisco Model, January 2007. Revised January 2008. Notes: ¹ Central Subways T-Third long-line to Visitacion Valley and T-Third short-line to 18 th and Third Streets. ² 15-Third Line shifts to 9X-San Bruno or to the T-Third line. ³ 45 Union/Stockton extended into Mission Bay.					

TABLE E-3**ESTIMATED DAILY TRANSIT RIDERSHIP****SUMMARY OF ORIGIN-DESTINATION PATTERNS FOR 15-THIRD BUS LINE**

		Vis Valley– Crocker-Amazon	Bayview-Hunters Point	Mission–Bernal	Potrero– Mission-Bay	SOMA	Financial District – Civic Center	Chinatown– North Beach	Superdistrict 2	Superdistrict 3	Superdistrict 4	South Bay	East Bay	North Bay	Total
FROM	Vis Valley– Crocker-Amazon	744	754	79		762	262	476	101	262	187	284			3,911
	Bayview-Hunters Point	640	1,010	9	163	1,775	945	666	139	110	121	94	27		5,701
	Mission–Bernal	115	264		28	37				27	48				520
	Potrero– Mission-Bay		155		32	107	260	75	39	24					692
	SOMA	250	825		182	57	230	553	74	24	116	75	88		2,473
	Financial District – Civic Center	289	543		195	74	48	566	44			207	59	28	2,054
	Chinatown–North Beach	200	700	408	136	976	909	935	107	112	45	314	112		4,954
	Superdistrict 2	305	312			61		321				61			1,060
	Superdistrict 3	24	370			135		184	27			58			797
	Superdistrict 4	243	99			28		14							384
	South Bay	91	139			192	230	43	27	64	16	75			878
	East Bay	529	174		28							75			805
	North Bay	30							30						60
	Total	3,460	5,346	496	764	4,204	2,885	3,832	589	623	533	1,243	286	28	24,289

TABLE E-4
ESTIMATED DAILY TRANSIT RIDERSHIP
SUMMARY OF ORIGIN-DESTINATION PATTERNS FOR ALL CORRIDOR ROUTES
(9AX, 9BX, 9X, 15, 30, 45)

		Vis Valley– Crocker Amazon	Bayview Hunters Point	Mission–Bernal	Potrero– Mission Bay	SOMA	Financial District – Civic Center	Chinatown– North Beach	Superdistrict 2	Superdistrict 3	Superdistrict 4	South Bay	East Bay	North Bay	Total
FROM	Vis Valley– Crocker Amazon	1,935	821	263	45	1,587	1,064	1,684	252	434	295	335	116	-	8,831
	Bayview Hunters Point	694	1,010	9	163	2,268	1,064	1,356	155	232	121	94	27		7,194
	Mission–Bernal	211	264		54	219		246		91	48				1,133
	Potrero– Mission Bay	82	155	64	42	347	519	551	39	105					1,905
	SOMA	1,070	883	7	601	1,324	1,433	2,791	282	915	116	356	148		9,926
	Financial District – Civic Center	568	658		560	337	237	1,487	94	1,750	22	261	59	28	6,061
	Chinatown–North Beach	2,783	758	674	280	4,012	2,633	3,273	276	2,904	251	387	173		18,405
	Superdistrict 2	356	312			247		530		147		88			1,681
	Superdistrict 3	135	580	330	134	2,220	2,768	7,404	48	841	115	281	292		15,149
	Superdistrict 4	276	99			103		133		16					626
	South Bay	141	139		16	485	404	321	27	153	16	82			1,782
	East Bay	594	174		28			339		196		75			1,406
	North Bay	30						109	30						169
	Total	8,874	5,855	1,347	1,924	13,150	10,122	20,223	1,203	7,784	983	1,959	815	28	74,268

TABLE E-9
EXISTING PARKING CONDITIONS

SEGMENT	APPROXIMATE NUMBER OF ON-STREET PARKING SPACES			NUMBER AND PERCENTAGE OCCUPIED		NOTES
	WEST	EAST	TOTAL	NO.	%	
Third Street:						
King to Townsend Streets	13	10	23	20	87	
Townsend to Brannan Streets	19	16	35	20	57	
Brannan to Bryant Streets	21	13	34	25	74	
Subtotal (Third Street)	53	39	92	65	71	
Fourth Street:						
King to Townsend Streets	0	0	0	0	0	
Townsend to Brannan Streets	5	15	20	14	70	
Brannan to Bryant Streets	20	16	36	30	83	
Bryant to Harrison Streets ¹	17	12	29	N/A	N/A	
Subtotal (Fourth Street)	42 (25)	43 (31)	85 (56)	-- (44)	-- (79)	With Bryant and Harrison (Without Bryant and Harrison)
Stockton Street:						
Geary to Post Streets	0	10	10	4	40	
Clay to Washington Streets	11	3	14	11	79	
Washington to Jackson Streets	8	12	20	18	90	
Subtotal (Stockton Street)	14 19	13 25	24 44	15 33	63 75	
TOTAL CORRIDOR ²	106 114 (89) (97)	95 107 (83) (95)	201 221 (172) (192)	-- (109) (142)	-- (74)	With Bryant and Harrison (Without Bryant and Harrison)
Source: San Francisco Department of Parking and Traffic, October 2006 and May 2007. Revised January 2008.						
¹ This segment of Fourth Street was under construction during the recent counts. Therefore, no parking occupancy data was available.						

TABLE E-10
2030 PARKING CONDITIONS

SEGMENT	APPROXIMATE NUMBER OF ON-STREET PARKING SPACES			
	NO PROJECT / TSM ALTERNATIVE	ENHANCED EIS/EIR ALTERNATIVE	FOURTH / STOCKTON ALTERNATIVE OPTION A (LPA)	FOURTH / STOCKTON ALTERNATIVE OPTION B (MODIFIED LPA)
<i>Third Street:</i>				
King to Townsend Brannan Streets	23	0	23	23
Townsend to Brannan Streets	35	35	35	35
Brannan to Bryant Streets	34	0	34	34
Subtotal (Third Street)	92	35	92	92
<i>Fourth Street:</i>				
King to Townsend Streets	0	0	0	0
Townsend to Brannan Streets	20	20	2	Semi-Exclusive 0 <u>2</u>
				Mixed-Flow 5
Brannan to Bryant Streets	36	0	36	Semi-Exclusive 7
				Mixed-Flow 3 <u>7</u>
Bryant to Harrison Streets	29	29	29	<u>Both</u> 0
Subtotal (Fourth Street)	85	49	67	Semi-Exclusive 7 <u>9</u>
				Mixed-Flow 8 <u>12</u>
<i>Stockton Street:</i>				
Geary to Post Streets	10	2	5	10
Clay to Washington Streets	14	4	8	10
<u>Washington to Jackson Streets</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>18</u>
Subtotal	24 <u>44</u>	6 <u>26</u>	13 <u>33</u>	20 <u>38</u>
TOTAL CORRIDOR	201 <u>221</u>	90 <u>110</u>	172 <u>192</u>	Semi-Exclusive 149 <u>139</u> Mixed-Flow 120 <u>142</u>
Source: San Francisco Department of Parking and Traffic, October 2006 and May 2007. <u>Revised January 2008.</u>				

TABLE E-11
ESTIMATED PM PEAK PERIOD RIDERSHIP
BY CENTRAL SUBWAY STATION
2030 CONDITIONS

STATION	2030 NO PROJECT /TSM	2030 ENHANCED EIS/EIR ALIGNMENT	2030 FOURTH / STOCKTON ALIGNMENT OPTION A (LPA)	2030 FOURTH / STOCKTON ALIGNMENT OPTION B (MODIFIED LPA)
Fourth and King	---	9,580 8,200	9,750 9,800	9,400 8,900
Fourth and Brannan	---	---	---	3,840 1,500
Third (between King and Townsend)	---	4,880 1,800	---	---
Moscone	---	2,830 2,400	4,800 1,700	4,740 1,300
Market Street	---	7,130 6,500	8,370 7,000	8,960 6,700
Union Square	---	1,140 800		
Chinatown	---	2,510 2,700	3,350 3,900	3,130 3,700
TOTAL IN CORRIDOR:	---	25,070 22,400	23,270 22,400	27,070 22,100

Source: San Francisco Model., January 2007. Revised January 2008.

NOTE: Under Alternative 3B up to three parking spaces would potentially be removed on the north side of Ellis Street to accommodate the expansion of the One Stockton Street (the Apple Store) access/egress into the public sidewalk area.