CHAPTER 6  SECTION 4(F) AND 6(F)  EVALUATION

6.1 Introduction

6.1.1 Section 4(f)

Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. 303) is intended to avoid or minimize impacts to public park and recreational areas, wildlife and waterfowl refuges, and certain historic properties.

The legislation limits the ability of the United States Department of Transportation (USDOT) to approve any transportation program or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) unless:

1. There is no prudent or feasible avoidance alternative to the use of the land from the Section 4(f) property; and,
2. The program or project includes all possible planning to minimize harm to the Section 4(f) property resulting from the use.

Section 4(f) of the DOT Act of 1966 applies to all operating administrations of the USDOT. The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) implement Section 4(f) requirements through regulations established at 23 CFR 774. Joint FHWA and Federal Transit Administration (FTA) define an avoidance alternative as “not feasible” if such an alternative cannot be built as a matter of sound engineering judgment. Similarly, the regulations state that an avoidance alternative is “not prudent” if it compromises the project to such an extent that the stated purpose and need can no longer be met, if a project would result in unacceptable safety or operations problems, or if it were to result in severe impacts to people, the environment, or other resources (23 CFR 774.117).

As Section 4(f) properties include historic or archaeological sites, the potential use of such properties requires coordination with the State Historic Preservation Officer (SHPO), in addition to any coordination that may be mandated under Section 106 of the National Historic Preservation Act.

6.1.2 Section 6(f)

Established by Congress in 1965, the Land and Water Conservation Fund is a federal grant program intended to help finance the acquisition or improvement of federal, state, or local park and recreation areas. Section 6(f) of the enabling legislation restricts the conversion of land acquired or developed under these grants to a non-recreational purpose without explicit approval from the United States Department of the Interior (DOI).
Under Section 6(f), replacement lands of equal value (monetary), location, and usefulness must be provided to obtain DOI approval of a conversion of Section 6(f) lands for transportation projects.

6.1.3 | Project Summary

The project alternatives involve implementing Bus Rapid Transit (BRT) service along San Francisco’s Geary corridor, between 48th Avenue to the west and the Transbay Transit Center to the east.

The San Francisco County Transportation Authority (SFCTA), in coordination with the San Francisco Municipal Transportation Agency (SFMTA), developed and analyzed several alternatives toward achieving the project’s purpose and need. The alternatives considered herein are summarized in the following section. For complete descriptions of the No Build and build alternatives and associated project components, please see Chapter 2.

- **No Build Alternative**
  - No BRT service. Only previously planned/programmed transit and infrastructure improvements would occur on Geary corridor.

- **Alternative 2: Side-Lane BRT**
  - BRT service would replace 38 Geary Limited service and operate in dedicated bus-only lanes on the outside edges of the Geary corridor. Existing 38 Geary Local service would remain in place.

- **Alternative 3: Center-Lane BRT with Dual Medians and Passing Lanes**
  - West of Gough Street, BRT service would operate in dedicated bus-only lanes in the center of the Geary corridor. East of Gough Street, BRT service would operate in dedicated bus-only lanes on the outside edges of the Geary corridor (similar to Alternative 2). Existing 38 Geary Local service would remain in place.

- **Alternative 3-Consolidated: Center-Lane BRT with Dual Medians and Consolidated Bus Service**
  - Same as Alternative 3; however, BRT service would replace both 38 Geary Limited and 38 Geary Local service in a new consolidated configuration.
• Hybrid Alternative
  o Incorporates various physical features of Alternatives 2 and 3. BRT service would operate in dedicated bus only lanes in the center of the Geary corridor between 27th Avenue and Palm Street. All other locations along the Geary corridor would implement side-running bus-only lanes, except 48th Avenue to 34th Avenue, where no bus-only lanes would be constructed. The Hybrid Alternative also incorporates the transit operations of Alternative 3-Consolidated, namely the consolidation of 38 Geary Limited and 38 Geary Local service.

6.2 Section 4(f) Resources

6.2.1 Parks and Recreation Properties

As listed in Table 6-1 and shown in Figure 6-1, there are 38 park and recreational properties in or in close proximity (0.5 mile radius) to the Geary corridor. The ID numbers in the table correspond to those shown in the figure.

Five of these properties are located directly adjacent to the Geary corridor:

• Hamilton Recreation Center and Playground (ID #6)
• Raymond Kimbell Playground (ID #9)
• Japantown Peace Plaza and Pagoda (ID #17)
• Sergeant John Macaulay Park (ID #23)
• Union Square (ID #19)

One resource is perpendicular to Geary Boulevard: the discontinuous path within the greenway lining both sides of Park Presidio Boulevard. In general, the resources are under local jurisdiction and comprise a mix of urban parks, playground, and recreation centers. Two resources are under federal jurisdiction (National Park Service); these two resources have public recreation aspects and attributes.

Table 6-1 Park and Recreational Facilities within 1/2 mile of Geary Corridor

<table>
<thead>
<tr>
<th>ID</th>
<th>NAME</th>
<th>LOCATION</th>
<th>OFFICIAL WITH JURISDICTION</th>
<th>KEY SECTION 4(F) ATTRIBUTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Angelo J. Rossi Playground</td>
<td>2 Willard North St.</td>
<td>San Francisco Recreation and Park (SFRP)</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>2</td>
<td>Argonne Playground</td>
<td>18th Ave. &amp; Geary Blvd.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>3</td>
<td>Cabrillo Playground</td>
<td>858 38th Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>4</td>
<td>Dupont Tennis Courts</td>
<td>336 31st Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>5</td>
<td>Fulton Playground</td>
<td>855 27th Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>ID</td>
<td>NAME</td>
<td>LOCATION</td>
<td>OFFICIAL WITH JURISDICTION</td>
<td>KEY SECTION 4(F) ATTRIBUTES</td>
</tr>
<tr>
<td>----</td>
<td>-------------------------------------------</td>
<td>---------------------------</td>
<td>----------------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>Hamilton Playground and Recreation Center</td>
<td>1900 Geary Blvd.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>7</td>
<td>Laurel Hill Playground</td>
<td>251 Euclid Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>8</td>
<td>Margaret S Hayward Playground</td>
<td>1016 Laguna St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>9</td>
<td>Raymond Kimbell Playground</td>
<td>Geary Blvd. &amp; Steiner St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>10</td>
<td>Justin Herman Plaza</td>
<td>Steuart St. &amp; Market St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>11</td>
<td>Richmond Recreation Center</td>
<td>251 18th Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>12</td>
<td>Rochambeau Playground</td>
<td>238 25th Ave.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>13</td>
<td>Rossi Swimming Pool</td>
<td>600 Arguello Blvd.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>14</td>
<td>Sue Bierman Park</td>
<td>Washington St. &amp; Drumm St.</td>
<td>SFRP</td>
<td>Public park and recreation area</td>
</tr>
<tr>
<td>15</td>
<td>Tenderloin Recreation Center</td>
<td>570 Ellis St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>16</td>
<td>Buchanan Street Mall</td>
<td>Buchanan b/t Eddy &amp; Grove St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>17</td>
<td>Japantown Peace Plaza And Pagoda</td>
<td>Post St. &amp; Buchanan St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>18</td>
<td>Balboa Natural Area</td>
<td>Balboa St. at Great Highway</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>19</td>
<td>Union Square</td>
<td>Post St. &amp; Stockton St.</td>
<td>SFRP</td>
<td>Public recreation area</td>
</tr>
<tr>
<td>20</td>
<td>Cottage Row Mini Park</td>
<td>Sutter St. &amp; Fillmore St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>21</td>
<td>Father Alfred E. Boeddeker Park</td>
<td>295 Eddy St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>22</td>
<td>Jefferson Square</td>
<td>Eddy St. &amp; Gough St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>23</td>
<td>Sergeant John Macaulay Park</td>
<td>Larkin St. &amp; O'Farrell St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>24</td>
<td>Lincoln Park</td>
<td>34th Ave. &amp; Clement St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>25</td>
<td>Mini Park at 10th &amp; Clement</td>
<td>351 9th Ave.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>26</td>
<td>Mini Park at Fillmore &amp; Turk Sts.</td>
<td>Fillmore St. &amp; Turk St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>27</td>
<td>Mini Park at Bush &amp; Baker Sts.</td>
<td>Bush St. &amp; Baker St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>28</td>
<td>Mini Park at O'Farrell &amp; Beideman Sts.</td>
<td>O'Farrell St. &amp; Beideman St.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>29</td>
<td>Mini Park at Steiner &amp; Golden Gate Sts.</td>
<td>Steiner St. &amp; Golden Gate Ave.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>30</td>
<td>Mountain Lake Park</td>
<td>One 11th Ave.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
<tr>
<td>31</td>
<td>Muriel Leff (&quot;Arguello&quot;) Mini Park</td>
<td>419-435 7th Ave.</td>
<td>SFRP</td>
<td>Public park</td>
</tr>
</tbody>
</table>
### 6.2.2 Wildlife and Waterfowl Refuges

There are no wildlife or waterfowl refuges within the Geary corridor. The closest federal wildlife refuge is the Marin Islands National Wildlife Refuge (NWR), located on two islands in San Francisco Bay east of the City of San Rafael. This NWR is approximately 16 miles north of the Geary corridor.

The closest state wildlife area is the San Pablo Bay Wildlife Area in the mudflats and waters of San Pablo Bay near the mouth of the Petaluma River in Marin and Sonoma Counties. This area is approximately 30 miles northeast of the Geary corridor.

Given the distance between the above refuges and the Geary corridor, no use of any wildlife or waterfowl would foreseeably result from project implementation. Accordingly, such resources are not discussed further in this chapter.

### 6.2.3 Historic Sites

Properties that are on or eligible for the NRHP, including historic districts, buildings, structures, objects, and certain archaeological sites qualify for Section 4(f) protection.

#### 6.2.3.1 HISTORIC ARCHITECTURAL RESOURCES

Prior to conducting the Section 4(f) analysis, the process to identify and evaluate historic properties as required under Section 106 of the National Historic Preservation Act (NHPA) was completed for the proposed project and documented in a Historic Resources Inventory and Evaluation Report (HRIER) (JRP Historical Consulting, 2014).

Table 4.5-1 (in the Cultural Resources section) lists 53 eligible or potentially eligible historic architectural properties noted in the HRIER as being within the proposed project’s historic area of potential effect (APE). Figures 4.5-2 through 4.5-5 illustrate the locations of most of these properties. All 53 of these properties are considered Section 4(f) resources.
Figure 6-1  Park and Recreational Facilities within 1/2-mile of Geary Corridor

Jacobs, 2014 and Circlepoint, 2015
6.2.3.2 | ARCHAEOLOGICAL RESOURCES

The Archaeological and Native American Cultural Resources Sensitivity Assessment (ASA) investigated the Geary corridor APE for the potential presence of prehistoric and historic archaeological resources.

As the Geary corridor has been fully urbanized for nearly a century, there are no above-ground archaeological resources existing in the Geary corridor archaeological APE. The ASA identified eight previously recorded historic-era and nine previously recorded prehistoric era archaeological sites adjacent to, or in proximity to but outside of, the Geary corridor APE. These previously recorded sites yielded resources during prior excavation or other ground-disturbing activities.

In addition to these previously recorded sites, the ASA assessed the sensitivity of the entire Geary corridor for both historic- and prehistoric-era unrecorded resources. In terms of unknown prehistoric archaeological resources, the ASA noted that the eastern and western ends of the Geary corridor have relatively high potential to yield such resources. These are areas where blowing sand and sand dunes could have covered such resources. The ASA notes that if any such sites happen to be discovered in the course of construction, they would likely be eligible for the NRHP given the relative lack of documented prehistoric sites on the northern San Francisco peninsula.

In contrast, the ASA finds that most of the central part of the Geary corridor, as well as any areas underlain by bedrock, have no or very low potential to yield prehistoric archaeological resources.

As for historic-period archaeological resources, the ASA notes heightened sensitivity in the areas northeast of First Street and the portion of the Geary corridor between Masonic and Gough.

If excavation associated with the build alternatives were to uncover buried, unrecorded resources, it is possible that they would qualify as Section 4(f) properties. Such resources would be considered Section 4(f) properties only if they are found eligible for the NRHP under a criterion other than Criterion “D.” This type of NRHP eligibility means that a given resource has historical value that is closely connected to the physical location of the resource. (23 CFR 774.13 (b)(1)). Examples of archaeological resources that would potentially be considered Section 4(f) resources include pre-historic habitation sites or villages, rock art sites, and other similar resources whose specific location is an intrinsic part of the resource’s value.

In contrast, resources that have value only in terms of data that can be recovered from them are typically not considered Section 4(f) properties. These can include trash or debris scatters or other artifacts whose location of discovery does not add substantial cultural value to the resource in question.
6.3 Section 6(f) Resources

According to data compiled by the National Park Service, several parks in the City and County of San Francisco received grants from the Land and Water Conservation Fund (LWCF) dating as far back as 1967. The vast majority of LWCF grant funds were targeted at John McLaren Park and the Candlestick Point State Recreational Area (well outside Geary corridor).

The City and County received LWCF grants for “mini-park acquisition and development and park lighting” between 1968 and 1971. Table 6-1 above indicates the presence of several mini-parks within 0.5 mile of the Geary corridor. The mini park at Bush & Baker (#27) and the Willie “Woo Woo” Wong playground (#38) received LWCF funds, and thus are considered 6(f) resources. No other parks in the Geary corridor have been identified as receiving LWCF funding at any time.

6.4 Evaluation of Potential Impacts to Section 4(f) Properties

The Section 4(f) “use” of a resource is defined and addressed at 23 CFR 774.17. A “use” is classified in one of three ways: (1) as direct use/permanent incorporation, (2) temporary occupancy, or (3) as a constructive use. Section 4(f) uses are described in more detail below. In addition to these types of Section 4(f) use, the regulations also define a “de minimis” impact.

**Direct Use.** A direct use occurs when lands containing Section 4(f) resources will be permanently incorporated into a transportation facility.

**Temporary Occupancy.** A temporary occupancy occurs when the occupancy of the Section 4(f) resource is adverse in terms of the statute’s preservation purpose (i.e., the attributes of the resource that qualify it for Section 4(f) consideration). After the occupancy, the resource must be restored to the condition in which it was prior to construction.

A temporary occupancy (e.g., right-of-entry, construction, and other temporary easements) will not constitute a use of a Section 4(f) resource when all of the following conditions are met:

- Duration of the occupancy must be temporary (i.e., less than the time needed for construction of the project, and there should be no change in land ownership).
- Scope of the work must be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource are minimal).
- There are no anticipated permanent adverse physical impacts or interferences with the protected activities, features, or attributes.

---

• The land being used must be fully restored (i.e., the property must be returned to a condition that is at least as good as that what existed prior to the project).
• There must be documented agreement by the official(s) with jurisdiction over the resource regarding the previously described conditions.

Constructive Use. A constructive use of a Section 4(f) resource occurs when a transportation project does not permanently incorporate land from the resource, but the proximity of the project results in adverse impacts (e.g., noise, visual, access, and/or vibration impacts) so severe that the activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only if the protected activities, features, or attributes of the resource are substantially diminished, meaning that the value of the resource in terms of its 4(f) significance will be reduced or lost. This determination is made through the following process:

• Identification of the current activities, features, or attributes of the resource that may be sensitive to proximity impacts.
• Analysis of the potential proximity impacts on the resource.
• Consultation with the appropriate officials having jurisdiction over the resource.

Constructive use may include these examples:

• The projected noise level increase attributable to a proposed project substantially interferes with the use and enjoyment of a resource protected by Section 4(f).
• The proximity of a proposed project substantially impairs aesthetic features or attributes of a resource protected by Section 4(f), where such features or attributes are considered important contributing elements to the value of the resource.
• A proposed project results in a restriction of access to the Section 4(f) resource, which substantially diminishes or eliminates the utility or function of the resource.
• The vibration impact from operation of a proposed project would substantially impair the use of a Section 4(f) resource.

De Minimis Impact. Federal regulations define a de minimis impact to a public park, recreation area, or wildlife/waterfowl refuge as one that would not adversely affect the activities, features, or attributes of the property. For historic properties, federal regulations state that a de minimis impact is one that would result in a Section 106 determination of "no adverse effect" or "no historic properties affected."²

Guidance on the implementation of Section 4(f) states that a de minimis impact may be made for a permanent incorporation or a temporary occupancy of a Section 4(f) resource. Further, the guidance states that a de minimis impact determination is not a finding similar to a finding of a

² 23 CFR 774.117
direct, temporary, or constructive use. A determination that a project would result in a de minimis impact does not require the identification of avoidance alternatives since it is assumed that any de minimis effect is negligible in nature.\(^3\)

A de minimis impact determination requires agency coordination with the officials having jurisdiction over the Section 4(f) property and opportunities for public involvement, as well as concurrence from the official with jurisdiction, which may be the SHPO if the Section 4(f) property is eligible for the National Register.

### 6.4.1 Evaluation of Impacts to Park and Recreational Facilities

#### 6.4.1.1 Potential for Direct Use of Park and Recreational Facilities

The project would not permanently or temporarily incorporate any Section 4(f) resources, thus there would be no direct impacts. The project would not directly use any park or recreational facility since the project would be located within the existing Geary corridor or immediately adjacent sidewalk areas where no public parks or recreational facilities exist.

This conclusion takes into account the Park Presidio path, which exists within the greenway of Park Presidio Boulevard. Park Presidio Boulevard is lined on both its western and eastern sides by a discontinuous greenway, with a maintained dirt recreational path that runs within the eastern side of the greenway. The path is a Section 4(f) resource because it is a public, recreational amenity that links Golden Gate Park with the Presidio and Mountain Lake Park. As it exists today, the earthen path is discontinuous, interrupted by all streets perpendicular to Park Presidio Boulevard between Fulton Street and Lake Street, including Geary Boulevard.

The build alternatives would make alterations to the existing Geary Boulevard roadway that currently interrupts the Park Presidio path, but would not widen the existing roadway right-of-way and would not permanently incorporate any land from the Park Presidio path. With the project, as at present, recreational users of the path would be guided to cross Geary Boulevard at the existing crosswalk, some 50 feet to the west of the path. Therefore, the build alternatives would not directly use the Park Presidio Path.

Therefore, none of the build alternatives would have any potential for direct use of any park or recreation facility.

#### 6.4.1.2 Potential for Temporary Occupancy of Park and Recreational Facilities

While some temporary construction staging areas will be needed to implement the build alternatives, none would use any park or recreational spaces or access thereto. Construction activities that may occur adjacent to

---

\(^3\) FHWA, July 2012, *Section 4(f) Policy Paper*; FTA, November 2012, Memorandum of Associate Administrator Lucy Garliauskas; *FTA Use of the FHWA Section 4(f) Policy Paper*. 
park and recreation locations are expected to be of short duration and would be conducted in accordance with permit conditions to protect the physical urban environment, thus limiting potential impacts during construction. There would be no loss of access to any recreational facilities and the project would not directly impact any parks or recreation areas. For these reasons, these temporary impacts do not meet the criteria for a Section 4(f) temporary use and construction activities are not expected to require the temporary utilization of, or have adverse effects on, any Section 4(f)-protected properties.

6.4.1.3 | POTENTIAL FOR CONSTRUCTIVE USE OF PARK AND RECREATIONAL FACILITIES

Relative to potential constructive uses, the proposed changes associated with the build alternatives would not have an adverse effect on any park or recreational properties in the study area. The noise and vibration analysis conducted for this document (Section 4.11) concluded that application of standard mitigation measures would avoid or lessen construction period noise and vibration impacts. Adherence to these measures would preclude the potential occurrence of any substantial impairment of park and recreational facilities.

Moreover, operational period noise along the Geary corridor would remain below both the City’s and Caltrans’ impact threshold criteria. As the existing project area’s noise levels are typical for a dense urban environment, noise associated with the BRT system would not be substantially different from or out of character with the existing urban setting. Based on these study findings, it is expected that the project would cause no noise or vibration related proximity impacts to parks or recreational properties. Therefore, no constructive use of Section 4(f) parks and recreational properties would occur.

6.4.2 | Evaluation of Impacts to Cultural Resources

6.4.2.1 | HISTORIC ARCHITECTURAL RESOURCES

Within the Geary corridor right-of-way, which includes sidewalk areas, three potentially eligible historic architectural resources have been identified and are thus considered here as Section 4(f) resources.

First is a group of 21 of the so-called “Golden Triangle” light standards (streetlights), which the HRIER prepared for this project identified as likely eligible for the NRHP and thus is treated here as a Section 4(f) property. There are approximately 189 of these Beaux-Arts style streetlights in the Union Square area; 21 are within the architectural APE. Of these 21, 14 are adjacent to improvements associated with the build alternatives.

Second are lighting standards associated with the Japan Center. These lighting standards are located on the sidewalk on the north side of Geary Boulevard between Fillmore and Laguna Streets. The Japan Center building and grounds are a potentially eligible historic architectural resource. The lighting standards in adjacent public right-of-way areas are therefore assumed to be contributing elements to its eligibility.
Third is the auxiliary water supply system (AWSS), which consists of cisterns, pipes, valves, hydrants, and pump stations across San Francisco. As noted in Section 4.5, the Geary corridor APE includes a small percentage of all City-wide AWSS cisterns, pipes, valves, and hydrants. Cisterns, pipes, and valves are located below the ground surface. No AWSS pump stations are located within the Geary corridor APE.

At present, both sets of streetlights are part of the urban fabric and share sidewalk space with functional elements of the streetscape, such as trash receptacles, newspaper boxes, and the like.

The build alternatives would make streetscape improvements in the vicinity of both sets of streetlights, as well as components of the AWSS, potentially requiring the relocation of one or more streetlights and/or AWSS cisterns valves, or hydrants. Such relocations could be considered a direct use. The current level of design does not clearly indicate whether any specific streetlight or AWSS component must be relocated in order to implement one or more of the build alternatives. However, such relocation cannot be entirely ruled out at this stage. Section 4.5 of this document sets forth an avoidance measure (A-CUL-5) requiring that the design of any streetscape improvements in the vicinity of the streetlights or AWSS components seeks to avoid any relocation of these resources. A related minimization measure (MIN-CUL-6) states that if streetlight/AWSS relocation is ultimately deemed necessary, such work must adhere to appropriate standards (Secretary of the Interior) so as to maintain the historic integrity of the streetlights if moved to a different location. Accordingly, in terms of Section 4(f) analysis, the final impact determination regarding the potential relocation of the streetlights and components of the AWSS system would be subject to consulting with the official with jurisdiction and other consulting parties pursuant to Section 106 (likely the California SHPO).

Regarding the potential for temporary use, construction activities are not expected to require the temporary use of any Section 4(f) property. Construction activities that may occur adjacent to historic resources are expected to be of short duration and would be conducted in accordance with permit conditions to protect the physical environment, thus avoiding any potential temporary use.

Furthermore, with the implementation of noise and vibration mitigation measures, adverse effects to historic architectural resources would be avoided or minimized during construction. Accordingly, no Section 4(f) constructive uses are expected.

6.4.2.2 | ARCHAEOLOGICAL RESOURCES

As noted in Section 4.5 of this document, there are no archaeological resources above ground in the Geary corridor. A total of 26 formally recorded archaeological sites were documented in the vicinity of or adjacent to the Geary corridor, but none are documented as extending into the Geary corridor. Accordingly, none of the project alternatives would result in any disturbance to previously recorded (i.e., known) archaeological sites.
As set forth in Section 4.5, in the event that any previously unknown intact archaeological resources are inadvertently discovered during construction, a determination as to NRHP eligibility will be made. If any archaeological resources are subsequently determined to be eligible for the NRHP under Criterion D (in other words, to warrant preservation in place) SFCTA, in concert with FTA, will prepare separate Section 4(f) evaluations for such resources. Such evaluations would include determinations of direct, constructive, and/or temporary use, and, if warranted, avoidance alternatives and measures to reduce harm to any qualifying Section 4(f) resources. Only archaeological resources that are eligible for the National Register and warrant preservation in place will be considered under Section 4(f).

6.5 Measures to Minimize Harm

The project alternatives would not result in the direct, temporary, or constructive use of any parks or recreational facilities, wildlife or waterfowl refuge, or any historic architectural resource. The project alternatives would also not result in the use of any known archaeological resources. As set forth in Section 4.5 of this document, the project incorporates avoidance and minimization measures that are intended to enable the SHPO to make a finding of no adverse effect to historic architectural resources.

All of the project alternatives incorporate, to some extent, various amenities and landscape features to enhance the experience of residents, motorists, transit riders, cyclists, and pedestrians in the Geary corridor and visually blend the transportation improvements into the existing urban neighborhood setting in a manner that is compatible with its context and setting. These amenities are substantially greater for the build alternatives.

Opportunities for harmonizing the visual effects of project elements with adjacent historic properties will continue to be developed as the design consultation process goes forward. Design elements, appropriate lighting, compatible materials, and color choices that complement and do not visually compete or clash with the nearby historic properties and are sensitive to their surroundings will be identified. Design will be guided by the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards) to the extent applicable. For all design elements along Geary Boulevard, a consulting historic architect working on behalf of SFMTA will review project plans to assure design elements are compatible with the character-defining features of the historic district in terms of massing, size, scale, and architectural features.

The DOI’s Standards (36 CFR, Part 68), are, according to the agency’s website, “common sense principles in non-technical language [that] were developed to help protect our nation’s irreplaceable cultural resources by promoting consistent preservation practices.” The Standards provide guidance for maintaining, repairing, and replacing historic materials, as well as about designing new additions or making alterations to historic

resources, including related landscape features and the building’s site and environment, including adjacent or related new construction. The following principles are most relevant to the proposed project:

- The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Where project features will be located in proximity to historic structures, the Standards will serve as a guide to assure that new structures are compatible with and do not radically change, obscure, damage, or destroy character-defining materials or features associated with historic properties.

Finally, as outlined and discussed in Section 4.4, Visual Resources, though some project build alternatives would create slight visual changes in the vicinity of certain park and recreational properties, the incorporation of compatibility features in the project design would minimize any visual effects on Section 4(f) properties.

### 6.6 Evaluation of Potential Impacts to Section 6(f) Properties

The Bush and Baker mini-park and Willie “Woo Woo” Wong playground received LWCF funds and are located within 0.5-mile of the Geary corridor. However, none of the project alternatives could foreseeably result in any adverse permanent or temporary effect to either of these Section 6(f) resources as they are both located over three blocks north of the Geary corridor. Therefore, there would be no adverse effects to any Section 6(f) properties.

### 6.7 Coordination

The project’s evaluation of cultural resources began with the delineation of the architectural and archaeological APEs. The SHPO reviewed and commented on the adequacy of the architectural and archaeological APEs delineated for the project alternatives in May 2015.

As part of local agency coordination, draft cultural reports (the HRIER, FOE, and ASA) were provided to the City of San Francisco Planning Department (Historic Preservation Commission staff) for review and comment.
This evaluation of parks and recreation facilities eligible for Section 4(f) protection included contacting staff from the City and County of San Francisco Parks and Recreation Department to ensure accuracy of the data collected during field visits and from the City and County’s website.