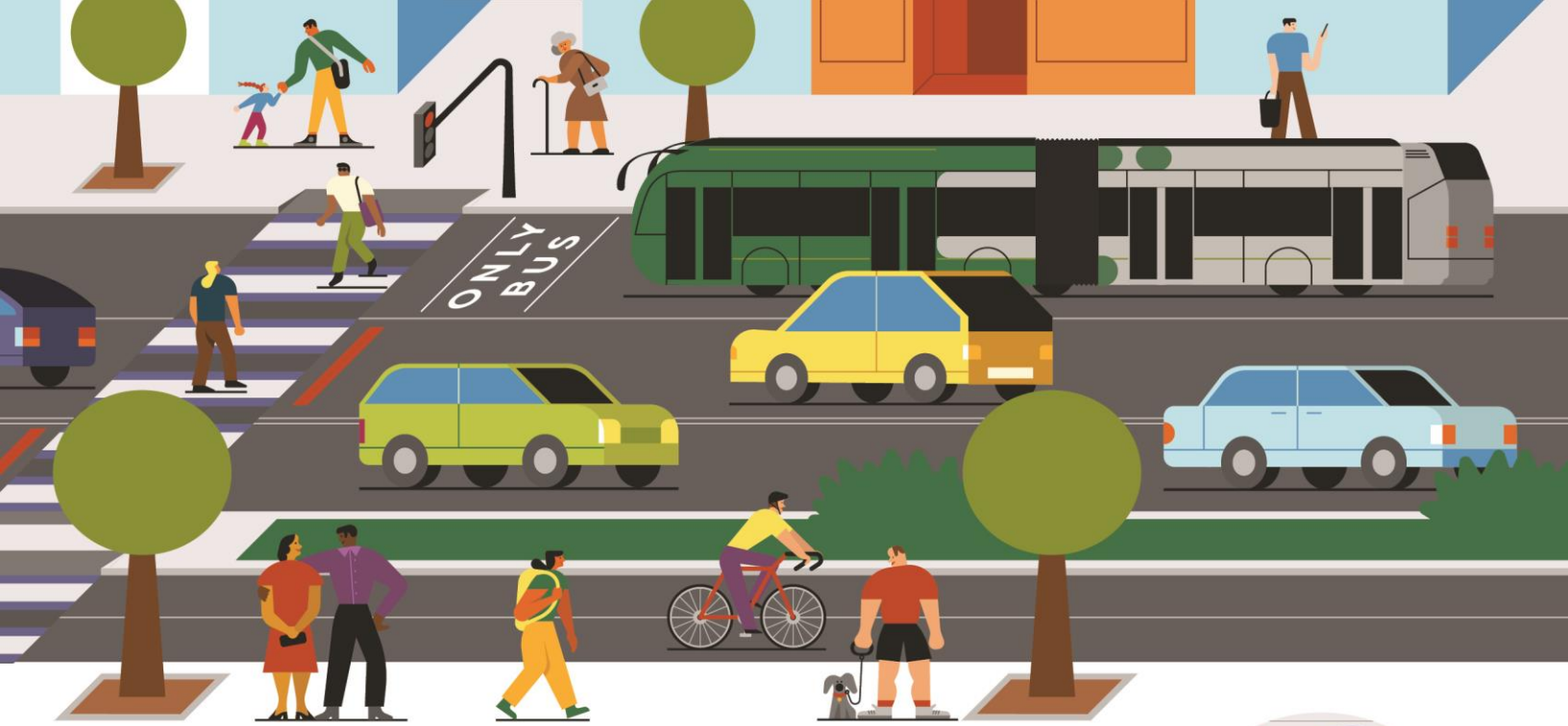

DOCUMENTED CATEGORIAL EXCLUSION

ADVANCED RAPID TRANSIT (ART) EAST/WEST CORRIDOR PROJECT

November 2025

(Version 5)

VIA RAPID

CONTENTS

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APPENDICES

1 PROJECT DESCRIPTION

Project Name: VIA Advanced Rapid Transit East/West Corridor Project
Sponsoring Agency: VIA Metropolitan Transit
Point of Contact: Maricela Diaz-Wells, Special Projects Manager, VIA Metropolitan Transit
Anticipated Source of Federal Funds: Federal Transit Administration (FTA)

The Federal Transit Administration (FTA) has initiated the National Environmental Policy Act (NEPA) compliance for VIA Metropolitan Transit's (VIA) Advanced Rapid Transit (ART) East/West Corridor Project (the "Project"). On August 13, 2024, FTA determined that the probable NEPA class of action for the Project is a Categorical Exclusion (CE). FTA has also determined that the Project is a Federal undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and is the type of activity that has the potential to cause effects on historic properties.

The Project is an approximately 7.3-mile bus rapid transit line within the City of San Antonio, Texas. The Project corridor extends from General McMullen Drive in the west, through Downtown, to Coca-Cola Place in the east, along the following roadways: Commerce Street, Buena Vista Street, Dolorosa Street, Market Street, Cherry Street, and East Houston Street (see **Appendix A** for **Project Location Map**). This corridor evaluated in this CE represents the area where construction activities are planned. The proposed bus rapid transit service is planned to extend beyond the 7.3-mile corridor to connect to the Kel-Lac Transit Center to the west and the future Eastside Transit Center to the east. No construction activities are anticipated outside of the 7.3-mile capital limits. NEPA compliance will apply exclusively to this 7.3-mile segment defined by the capital limits.

The Project includes transit signal priority and is proposed to operate in a mix of center dedicated lanes, curbside dedicated Business Access and Transit (BAT) lanes, and in mixed traffic. Based on the conceptual design, approximately 5.10 miles (70%) of the route will feature dedicated lanes, including 2.15 miles (30%) of center dedicated lanes and 2.95 miles (40%) of curbside dedicated BAT lanes. The remaining 2.20 miles (30%) will operate in mixed traffic.

Within the capital limits, the Project includes 18 new or modified station areas. Stations are planned to include amenities such as off-board fare collection, real-time arrival information, security cameras, lighting, and platforms for level boarding. In general, VIA plans to minimize significant ground disturbance or construction impacts in downtown by including stops with

limited amenities. Sidewalk improvements are planned to provide pedestrian and Americans with Disabilities Act access to the transit stations.

The Project currently includes 18 new or modified station areas[1] . Stations are planned to include amenities such as off-board fare collection, real-time arrival information, security cameras, lighting, and platforms for level boarding. In general, VIA plans to minimize significant ground disturbance or construction impacts downtown by including stops with limited amenities. Sidewalk improvements are planned to provide pedestrian and Americans with Disabilities Act (ADA) access to the transit stations. **Appendix A** depicts the alignment and station locations of the proposed Project and provides visualizations of the typical sections representing center-running lanes, BAT lanes, and mixed traffic lanes. Actual lane configuration and widths will vary based on the corridor dimensions.

The Project will include the procurement of low emission compressed natural gas vehicles to provide frequent service. Service will be provided seven days a week between 4:00 AM and 1:00 AM. On weekdays, trips will depart every 10 minutes from 6:00 AM to 9:00 PM and every 30 minutes at other times. On weekends, service will operate every 15 minutes from 6:00 AM to 7:00 PM and every 30 minutes at other times.

2 PROJECT CLASSIFICATION QUESTIONNAIRE

Will the Project have a significant effect on the Project area or its resources?

☐ Unknown, contact FTA. This project may not qualify for a categorical exclusion.

☐ Yes, contact FTA. This project may not qualify for a categorical exclusion.

☑ No.

Is the Project likely to generate intense public discussion, concern, or present extraordinary circumstances which may pose a significant effect?

☐ Unknown, contact FTA.

☐ Yes, contact FTA. This project may still be categorically excluded.

☑ No.

Will the Project involve property acquisition?

☐ We already own the property. Contact FTA regarding eligibility for Federal funding.

[1] Stations on one-way pairs are counted as one station area

☑ Yes, we intend to acquire property. Note that FTA generally prohibits property acquisition prior to the completion of NEPA.

☐ No, no property acquisition has or will be done for the Project.

Assuming historic properties are present in the Project area, is the Project the type of activity that has the potential to cause effects on historic properties?

☐ Unknown, contact FTA.

☑ Yes, contact FTA regarding consultation under Section 106 of the National Historic Preservation Act.

☐ No.

Does the Project involve the use of land from publicly owned parks, recreation areas, wildlife and waterfowl refuges, or public or private historic sites?

☐ Unknown, contact FTA.

☐ Yes, contact FTA regarding requirements under Section 4(f) of the DOT Act of 1966.

☑ No.

Will the Project be located within a 100-year floodplain?

☐ Unknown, contact FTA.

☑ Yes, contact FTA regarding further evaluation under Executive Order 11988.

☐ No, continue.

3 SUPPORTING DOCUMENTATION ON AREAS OF CONCERN

3.1 Property Acquisition/Relocation

If real property is to be acquired, describe it (the land, structures, location, etc.), the type of acquisition, and any relevant site assessment reports.

The proposed Project is anticipated to require approximately 0.48 acres (about 20,975 square feet) of new right-of-way (ROW) from 62 parcels along the Project corridor. Acquisition will be limited to narrow strips and corner cuts of properties along the existing ROW, which will be necessary to accommodate the proposed improvements. More information on the potential acquisitions can be found in the **Community Impacts Analysis Report** provided in **Appendix B**.

Where an acquisition requires the displacement of businesses or individuals, document compliance with the Uniform Relocation Act.

The Project will not result in any displacement along the corridor. No relocation will be required.

For this Project, VIA will comply with all applicable property-related regulations and policies, including:

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 including amendments (Uniform Relocation Act), which provides policies for federally funded projects that require real property acquisition, including protections for residential and commercial owners.
- VIA Real Estate and ROW policies, which outline VIA's approach to real property acquisition.

Describe any temporary effects (e.g., any temporary easements needed).

The Project will require temporary construction easements to facilitate construction activities, including staging equipment, storing material, and accessing work areas. These easements are anticipated to be short-term in duration and will not result in permanent impacts on the affected properties. Upon completion of construction, all temporarily affected areas will be restored to a condition comparable to their pre-construction state and suitable for their original use.

3.2 Land Use and Zoning Effects

Document that the Project is consistent with surrounding land use and zoning.

The Project travels through downtown San Antonio where zoning/land uses are largely residential, commercial, retail, office, and some industrial districts. An Existing Zoning map can be found in the **Community Impacts Analysis Report** provided in **Appendix B** for more details on surrounding land use.

The Project is not expected to change current land use/zoning along the corridor given that it will operate within the existing street network and mainly enhance the VIA transit system that is already in place. Partial acquisitions, limited to narrow strips and corner cuts of properties along the existing ROW, will not result in changes that will be inconsistent with current zoning.

The Project will also be consistent with the San *Antonio Tomorrow* (*SA Tomorrow) Comprehensive Plan* (City of San Antonio [COSA] 2016a) and the *VIA Vision 2040 Long Range Plan* (VIA 2016) to promote multimodal connections and encourage high-capacity transit, particularly along the Commerce-Houston street corridor. The Project design will meet many of

the goals of the *SA Tomorrow Multimodal Transportation Plan* (COSA 2016b), including the mobility goal, safety and security goal, and more. A more detailed analysis of the Project's potential impacts on land use, zoning, and community disruption is provided in **Appendix B Community Impacts Analysis Report**.

3.3 Transportation Effects

Document potential traffic and parking effects.

A traffic analysis was completed that assessed the potential effects on roadway traffic operations along the Project's corridor. (See **Appendix C Traffic Operational Analysis Report).** The results of the traffic analysis suggest that the application of the Project is not expected to have a significant impact on general traffic operations as it relates to intersections along the study area.

The Project is estimated to result in the removal of 66 commercial off-street parking spaces from 14 parcels along the Project alignment due to ROW acquisition. For motorists, the permanent removal of 32 on-street parking spaces on Buena Vista Street, due to station platforms, may result in some inconvenience but most on-street parking will be maintained.

Indicate whether the existing roadways have adequate capacity to handle increased vehicular traffic, if any, and identify level of service.

A Level of Service (LOS) is assigned to represent the existing or anticipated quality of service experienced by drivers during the peak travel hours. LOS A represents the best operating conditions during analysis periods, and LOS F represents the worst conditions. Per the Texas Department of Transportation (TxDOT) Roadway Design Manual (2024), heavily developed urban areas may necessitate the use of LOS D for the design. LOS E, which represents near capacity and when congestion is imminent during busier times of the day/year, is typically accepted for multimodal projects.

For the Project, traffic impacts were assessed by comparing the Build Alternative LOS with the No Build Alternative LOS at study intersections along the Project corridor. The LOS for study intersections are summarized in **Table 3.3-1**.

As shown in **Table 3.3-1**, under the No Build Alternative, all signalized intersections along the Project corridor are projected to operate at an acceptable level of service (LOS D or better). Under the Build Alternative, minor traffic impacts are anticipated at two intersections during the PM peak hour, where operations are expected to degrade to LOS E. However, these impacts are not anticipated to result in substantial degradation of overall corridor operations. General

traffic operations are expected to benefit from transit priority signals implemented by the Project along the corridor. In addition, traffic conditions and road user safety are expected to improve with the Project through the addition of new signalized intersections, installation of medians and PHBs, and modifications to signal phasing at various locations.

Table 3.3-1: LOS Results for Study Intersections

Level of Service (LOS)	Signalized Intersections					
	Existing Scenario		No Build Alternative (2029[2])		Build Alternative (2029)	
	AM	PM	AM	PM	AM	PM
D or Better	56	56	56	56	58	56
E	0	0	0	0	0	2
F	0	0	0	0	0	0
Total	56	56	56	56	58	58

Source: VIA, 2025

Is there any loss of parking? Loss of general-purpose travel lane?

The Project is estimated to result in the removal of 66 commercial off-street parking spaces from 14 parcels along the Project alignment due to ROW acquisition associated with pavement widening and station platform at intersections. These include approximately 17 spaces at the northwest corner of General McMullen Drive and Commerce Street, 34 spaces at the northwest, northeast, and southwest corners of 24th Street and Commerce Street, and 15 spaces at New Braunfels Street and Houston Street. These affected parking spaces are not associated with any community facilities, and their loss is not expected to impair the accessibility or functionality of the associated businesses or adjacent properties. Thirty-two on-street parking spaces on Buena Vista will be removed due to new station platforms, but most on-street parking along the corridor will be maintained. More information on parking impacts can be found in the **Community Impacts Analysis Report** provided in **Appendix B**.

The conversion of general-purpose lanes to dedicated transit-only lanes is proposed for approximately 5.1 miles (70%) of the corridor. This will result in the loss of a general-purpose

[2] The Traffic Operational Analysis Report was completed based on the Project's original opening year of 2029. The schedule has since been updated to show revenue service beginning in 2030, but no updates are anticipated to the traffic model, as any forecasted traffic growth over that time period would be considered negligible when compared to 2029 Build Scenario volumes.

travel lane along the corridor except at locations where mixed traffic lanes are proposed at Commerce Street and Buena Vista Street between Colorado Street and Frio Street, Market Street between Alamo Street and Bowie Street, Tower of the Americas Way, Commerce Street between Bowie Street and Cherry Street, and Houston Street between Pine Street and Coca Cola Place (See **Appendix A Project Location Map**). Although the Project will reduce the number of through lanes at most locations to accommodate a dedicated transit lane or BAT lane, it is not expected to adversely affect overall traffic operations along the corridor. The Project includes proposed improvements such as new sidewalks, PHBs, and enhanced traffic signal timing at key intersections. These improvements will maintain acceptable traffic flow and intersection performance throughout the corridor and increase overall connectivity and safety for all transportation modes. Pedestrians and transit users will be able to transition between modes more conveniently and safely due to the Project. Detailed analysis of traffic operations can be found in the **Traffic Operational Analysis Report,** provided in **Appendix C.**

Describe connectivity to other transportation facilities, modes, and relevant agencies.

The Project will improve the overall access and mobility in the Project corridor by providing faster and more reliable ART services and offering better connectivity to key destinations throughout the region—particularly benefiting individuals without access to a private vehicle. The proposed Frio Street station, located approximately 300 feet from VIA's Centro Plaza Transit Center, one of VIA's busiest transit centers, will strengthen connections between this corridor and the broader regional transit network through local, Express, frequent routes, and Link, VIA's mobility on demand service. The corridor also intersects a number of frequent routes, including the ART North/South Corridor project, which is currently under construction. Additionally, local service is planned to extend beyond the Project limits – connecting west to the Kel-Lac Transit Center, another of VIA's highest-ridership transit centers, and east to a future Eastside Transit Center. The Project will connect directly to Link throughout Downtown and at the future Eastside Transit Center.

The Project will make the corridor more pedestrian and bicycle-friendly with improvements to sidewalks, curb ramps, and some bicycle facilities, upgrading crosswalks and intersections to meet ADA guidelines, and installing new crosswalk beacons. These improvements will increase overall connectivity and safety for all transportation modes. Pedestrians and transit users will be able to transition between modes more conveniently and safely due to the Project.

3.4 Air Quality

Document that requirements of the Clean Air Act have been met.

The Project is located in Bexar County, which is in attainment for all criteria pollutants except for ozone. The Project is currently listed in the Alamo Area Metropolitan Planning Organization's (AAMPO) conforming Metropolitan Transportation Plan (MTP) 2050 (Mobility 2050) (2023) and FY 2023-2026 Transportation Improvement Program (TIP) (2022); therefore, it regionally conforms to the goals of the State Implementation Plan (SIP) with regards to regional air quality conformity and will not cause or contribute to an exceedance of the National Ambient Air Quality Standards (NAAQS).

Describe any effects to air quality resulting from the Project.

An air quality analysis was conducted for the Project. The analysis determined that construction and operation of the Project will not produce any potentially adverse air quality effects under NEPA:

- As mentioned above, the Project is included in the region's transportation plans and programs and is expected to conform to regional air quality goals.
- The Project location is in attainment for Carbon Monoxide (CO) and particulate matter; therefore, it does not require a detailed project-level analysis to demonstrate that there will be no exceedance of NAAQS. A CO hot spot analysis is not required.
- According to the Federal Highway Administration's (FHWA) tiered approach to determine the level of analysis for Mobile Source Air Toxics (MSAT), the Project falls within the Tier 1 category - projects with no potential for meaningful MSAT effects - and therefore, no MSAT analysis is required

Additionally, the Project will shift passenger vehicle traffic to transit use, resulting in a decrease in regional on-road daily vehicle miles traveled (VMT) in San Antonio metropolitan area. The decrease in VMT will eliminate emissions of criteria air pollutants and MSAT that will have otherwise been produced by passenger vehicle travel. Therefore, implementation of the proposed Project will provide environmental and community benefits through reducing emissions and facilitating enhanced accessibility to multimodal transportation options via an efficient ART network. The detailed **Air Quality Analysis Report** is provided in **Appendix D**.

Is the Project located in an Environmental Protection Agency-designated non attainment or maintenance area? If so, indicate the criteria pollutant below and contact FTA to determine if a hot spot analysis is necessary.

☐ Carbon Monoxide (CO)

☑ Ozone (O3)

☐ Particulate Matter (PM2.5)

☐ Particulate Matter (PM10)

☐ Nitrogen Dioxide (NO2)

☐ Sulfur Dioxide (SO2)

The Project is located in an attainment area for CO, $PM_{2.5,}$ and PM_{10}. As such, the Project is exempt from localized project-level conformity analyses. A CO hot spot analysis is not required.

Does the Project require conformity analysis?

☑ No, it is exempt from conformity analysis under 40 CFR 93.126

☐ Yes

As mentioned above, the Project is included in AAMPO's MTP and TIP and is expected to conform to regional air quality goals**.**

If the non-attainment area is also in a metropolitan area, was the Project included in the MPO's Transportation Improvement Program air quality conformity analysis?

☐ N/A

☐ No

☑ Yes

3.5 Historic/Cultural Resources

3.5.1 Above-Ground Historic Resources

Document compliance with Section 106 of the National Historic Preservation Act.

FTA determined that the Project constitutes an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and has the potential to affect historic properties. In compliance with Section 106, all historic resources within the Area of Potential Effects (APE), both eligible and ineligible for listing on the National Register of Historic Places (NRHP), were identified and evaluated for potential effects.

Public involvement conducted as part of the NEPA process also satisfied the public involvement requirements under Section 106. Opportunities for public input were provided through public meetings, project website updates, and comment periods, allowing interested parties and members of the public to learn about the Project and provide feedback on potential effects to historic properties. See **Section 3.16** for more information on the public involvement efforts that VIA conducted. Tribal consultation was conducted in accordance with Section 106 government-to-government consultation requirements, led by FTA.

A summary of all coordination activities is provided in the following sections with full documentation included in the **Above-Ground Historic Resources Survey Report** in **Appendix E.**

Describe any historic resources that are in or around the immediate vicinity of the Project.

VIA conducted a review of historic resources within the Project APE. Within the APE, there are approximately 44 properties listed in or previously determined eligible for the NRHP. In addition, the COSA Office of Historic Preservation (OHP) lists 44 landmarks and historic districts in the APE (see the **Above-Ground Historic Resources Survey Report** in **Appendix E** for a list of the historic resources in the APE).

In addition, VIA conducted a historic resources survey for the Project APE and documented all resources within the APE constructed in 1980 or earlier (“historic-age”), 45 years before the proposed construction-letting date of 2027. Results of the survey are further described in the **Findings** subsection that follows.

Describe the potential for the Project to affect that resource. Attach any relevant documentation and correspondence.

Direct physical impacts to individual historic properties are summarized in **Table 3.5-1** and brief descriptions of effects follow for these properties and historic districts. For all NRHP-eligible or listed properties, including historic districts, a determination of no adverse direct physical effect is recommended. For additional details, see the **Above-Ground Historic Resource Survey Report** in **Appendix E**.

Table 3.5-1: Direct Physical Impact Summary for Individual Historic Resources

Resource No.	Address	NRHP Status	ROW Acquisition Acreage
167	2424 Buena Vista St	Recommended contributing to NRHP Buena Vista Historic District	0.01
372B	1731 E Houston St	Recommended contributing to NRHP Dignowity Hill Historic District	<0.01
376	430 N Olive St	Recommended contributing to NRHP Dignowity Hill Historic District	0.02
671	1534 E Houston St	Recommended contributing to NRHP Dignowity Hill Historic District	0.01
698A&B	2403 E Houston Street	Recommended contributing to NRHP Harvard Place Eastlawn-Jefferson Heights Historic District	<0.01

Source: VIA, 2025

The Project will not introduce substantial visual, auditory, or vibratory elements that will diminish the integrity of location, design, setting, materials, workmanship, feeling, or association of any historic property or district within or overlapping the APE.

The Project will introduce 18 new or modified stations that will include platforms, shelters, canopies, seating, signage, lighting, and/or other streetscape improvements. The stations will remain along the roadway consistent with the placement of current VIA bus stops. New stations and transit traffic along the existing transportation corridor will not result in a substantive change in setting for the historic properties.

To optimize the visual impacts, VIA plans to do the following:

- VIA will use station designs standardized under VIA's first ART project, the ART North/South Corridor Project. For that project, the stations resemble standard shelter design with a minimal and light structural design, which are used throughout the transit system and have been granted Certificates of Appropriateness by City of San Antonio Office of Historic Preservation (COSA OHP) for use throughout the city. VIA will seek a Certificate of Appropriateness for all stations. As part of this process, VIA will meet with community members in local historic districts.
- Through the VIA Art in Transit program, windscreen panel designs will be solicited from students by working with the schools along the East/West corridor. The artwork for the

panels can reflect the historic, cultural and artistic expressions of the specific station areas.

- In the Downtown segment, existing stops will be retrofitted with new equipment. In St. Paul Square (Hoefgen Station) and in the Zona Cultural (Frio Station), the existing approved shelter design will be used and there will be no platform or ramps. The Frio Station, along with several other stops in the Zona Cultural, will include artwork that aligns with the historic area's brand.

Overall, the proposed station design is a fairly transparent design with a cantilevered canopy that reduces the sense of enclosure. As such, the structure will offer components (windscreen art panels, horizontal structure band) that can reflect local station iconography, while allowing the existing historic fabric to 'read through' the station environment. Station renderings are provided in the **Above-Ground Historic Resources Survey Report** in **Appendix E.**

Additionally, noise and vibration impacts will not substantially increase as a result of the Project and future changes in these levels will not inhibit the properties from conveying their significance. Furthermore, no reasonably foreseeable effects caused by the Project that may occur later in time, be farther removed in distance, or be cumulative were identified in this effects assessment. Thus, for the proposed Project, a determination of no adverse visual, indirect, cumulative, or reasonably foreseeable effects was recommended.

Document any consultation and determinations or findings made.

Consultation

The Texas Historical Commission (THC) was consulted with as a consulting party. In addition to THC, on February 7, 2025, FTA contacted six Native American tribes with an invitation to help identify places that may be impacted by the Project that may have traditional religious and cultural importance to their tribal organizations. No response was received. Furthermore, in May 2025, VIA invited 13 additional potential consulting parties to participate in the Section 106 process, including COSA OHP, the San Antonio Conservation Society, and 11 neighborhood associations along the Project corridor. Of these 13 parties, four responded and confirmed their interest in serving as consulting parties: COSA OHP, the San Antonio Conservation Society, the San Antonio Downtown Neighborhood Association, and the Dignowity Hill Neighborhood Association.

On August 13, 2025, VIA distributed the above-ground historic resources and archaeological resources reports to the consulting parties for review. Subsequently, on August 28, 2025, VIA

conducted a Section 106 consulting party meeting to discuss findings of the studies on above-ground historic and underground archeological resources.

The list of potential consulting parties their comments, and public input gathered through the Section 106 and public involvement process are included in the **Above-Ground Historic Resources Survey Report**, provided in **Appendix E**.

Findings

The findings and recommendations of the above-ground historic resources survey are summarized below. The details of the methodology used for the findings and recommendations, as well as additional details regarding the properties, can be found as part of the **Above-Ground Historic Resources Survey Report** in **Appendix E**.

As a result of the survey, five resources are recommended individually eligible for listing in the NRHP including:

- Resource 263: Two-story Italianate, early twentieth-century commercial building
- Resource 282: The O. Henry House
- Resource 321A: The Lila Cockrell Theater
- Resource 352: Tucker's Kozy Corner
- Resource 466A: The Freeman Coliseum

Additionally, 26 are recommended contributing to historic districts listed or previously determined eligible for the NRHP and are listed in section 7.3.1.1 of the **Above-Ground Historic Resources Survey Report** in **Appendix E**

Three COSA OHP local historic districts—Cattleman Square, HemisFair, and Dignowity Hill—are recommended as eligible for listing in the NRHP. A boundary expansion is recommended for one existing NRHP-eligible historic district (Buena Vista Historic District). Furthermore, one new historic district, Harvard Place Eastlawn – Jefferson Heights, is recommended eligible for listing in the NRHP, including 69 properties contributing to the district within the Project APE. Finally, two bridges were recommended exempt from Section 106 per Program Comment 77 FR 68790:

- Resource 050: a 1975 concrete continuous slab bridge carrying West Commerce Street over Apache Creek
- Resource 201: a 1963 concrete continuous slab bridge carrying West Commerce Street over Alazan Creek

Photos and maps depicting these properties and districts can be found in the **Above-Ground Historic Resources Survey Report** in **Appendix E**.

Based on the findings of the historic resources survey, FTA determined the eligibility of properties within the APE for listing in the NRHP. On July 31, THC concurred with FTA's eligibility determination. Subsequently, FTA determined that the Project would have no adverse effect on historic properties, with THC concurring on this effect determination on October 8, 2025 (see **Appendix E** for letter from THC).

3.5.2 Archaeology

Document compliance with Section 106 of the National Historic Preservation Act.

VIA conducted an archeological desktop review to identify known or potential archaeological resources within the Project APE, in compliance with Section 106 NHPA and Antiquities Code of Texas (ACT). More details on methodology used to conduct the archeological desktop review can be found in the **Archaeological Desktop Overview**, provided in **Appendix F**.

Describe any cultural, historic, or archaeological resources that are in or around the immediate vicinity of the Project.

Based on the archeological desktop review, 31 archaeological sites are located within or overlap portions of the APE. Of these archaeological sites, one is listed on the NRHP, three are recommended eligible for listing on the NRHP, 13 are ineligible for listing on the NRHP, five have undetermined eligibility, and nine have not been assessed for listing on the NRHP. Additionally, one vicinity historic cemetery (BX-C339) is recorded adjacent of the Project APE. The recorded archaeological sites, surveys and the historic cemetery are also depicted in the map exhibit in the **Archaeological Desktop Overview** in **Appendix F**.

Describe the potential for the Project to affect that resource. Attach any relevant documentation and correspondence.

The archeological desktop review identified numerous previously recorded archeological sites within the APE. These archaeological sites may still contain intact cultural material, likely beneath the disturbances from current and past infrastructure. There is potential for both prehistoric- and historic-age sites to be encountered if construction extends below the existing street surfaces and subgrade.

In addition, during consultation with THC, THC identified the area near the historic cemetery as a high-probability area for unmarked graves and recommended archaeological scraping in this area to identify potential unmarked graves.

Document any consultation and determinations or findings made.

Consultation

THC is a consulting party for the archeological review. As described above for above-ground resources, VIA and FTA invited consulting parties to review the findings of the studies on underground archeological resources. Consultation with THC and consulting parties is documented in **Archeological Desktop Overview**, provided in **Appendix F.**

Findings and Recommendations

In order to avoid an adverse effect to archeological resources during construction, FTA and VIA, in consultation with THC and the consulting parties developed a Construction Monitoring and Inadvertent Discovery Plan (see **Appendix G**) in accordance with 36 CFR 800.16.

In addition, THC recommended archaeological scraping for unmarked graves that may be near the area of proposed construction. FTA and VIA, in consultation with THC, developed a scraping plan to ensure full compliance with Chapter 711 of the Texas Health and Safety Code. The specific areas for scraping will be defined in consultation with THC and COSA OHP once project plans identify the full extent of ground disturbances. The scraping procedures are included in the **Construction Monitoring, Mechanical Scraping and Inadvertent Discovery Plan** provided in **Appendix G**. Based on the conditions set forth in the document, FTA determined that the Project would result in no adverse effect to archeological sites. On October 8, 2025, THC concurred with this determination (see **Appendix G** for letter from THC).

3.6 Section 4(f)

Document compliance with Section 4(f) of the Department of Transportation Act of 1966.

In accordance with Section 4(f) of the Department of Transportation Act of 1966, as amended (23 CFR 774-codified in 49 U.S.C. 303 and generally referred to as “Section 4(f)”), VIA has evaluated the potential effects of the Project on the following properties of national, state, or local significance:

- Publicly owned, publicly accessible parklands and recreational lands;
- Publicly owned wildlife/waterfowl refuges, regardless of public access; and
- Historic sites, regardless of public or private ownership.

If the Project is located in or adjacent to a publicly owned park, recreation area or wildlife or waterfowl refuge, or a publicly or privately owned historic district/ property, document any use of that resource.

The Project does not occur within a publicly owned and accessible park, recreation area and wildlife refuge. While parks or recreation areas were identified adjacent to the Project area, no impacts or ROW acquisition will occur at the parks or recreation areas.

At five historic properties (see Table 3.6-1), the proposed Project will require a small amount of ROW. The acquisition will not affect contributing resources or the properties' ability to convey their significance.

Table 3.6-1: Affected Section 4(f) Historic Properties

Resource No.	Address	ROW Acquisition Acreage	Section 106 Effect	Use	*De Minimis?*
167	2424 Buena Vista St	0.01	No adverse effect	Direct	Yes, *de minimis*
372B	1731 E. Houston St.	<0.01	No adverse effect	Direct	Yes, *de minimis*
376	430 N. Olive St.	0.02	No adverse effect	Direct	Yes, *de minimis*
671	1534 E. Houston St	0.01	No adverse effect	Direct	Yes, *de minimis*
698A&B	2403 E. Houston St.	<0.01	No adverse effect	Direct	Yes, *de minimis*

Source: VIA, 2025

Describe the potential effects so FTA can make a Section 4(f) finding.

The Project is not located within any publicly owned and accessible park, recreation area, or wildlife refuge. Therefore, no impacts to such resources are anticipated.

As noted above, the acquisition of a small amount of ROW from the historic properties itemized in **Table 3.61** above will not affect contributing resources and will not affect the properties' ability to convey their significance. The impact would be *de minimis* as the proposed Project would have no adverse effect under Section 106 of NHPA. The Project will not result in a temporary occupancy at any of these properties or substantially impair the features or attributes that qualify the resources for protection under Section 4(f). The impacts on all other historic districts/properties that are adjacent to the Project are discussed in more detail in the **Historical Resources Survey Report** provided in **Appendix E** and in **Section 3.5** of this document.

3.7 Hazardous Materials

Describe the analysis used to determine whether hazardous materials were present.

A Phase I Environmental Site Assessment (ESA) was conducted to support environmental due diligence and identify potential environmental conditions that may affect the design, permitting, or construction of transit improvements along the Project corridor. The assessment was performed in general conformance with American Society for Testing and Materials (ASTM) Practice E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM 2021). The analysis included a review of historical land use within the corridor, federal and state regulatory databases, and a visual reconnaissance of the Project area.

Is there any known or potential contamination of the Project site?

Based on regulatory database reviews and site reconnaissance, VIA identified Recognized Environmental Conditions (RECs) at 21 properties along the Project corridor. The locations of these properties and details of the RECs are provided in the **Phase I Environmental Site Assessment Report** in **Appendix H**.

Describe mitigation and clean-up measures that will be taken to remove hazardous materials. If the Project includes property acquisition, a Phase I Environmental Site Assessment may be required for the land to be acquired.

Among the properties identified with RECs, the following five will be subject to partial acquisition to accommodate ROW expansion or deep excavation, and construction activities related to signal pole installation along the corridor:

- Superior Convenient Stop, 3931 W Commerce Street
- Central Auto Transmission, 3502 W Commerce Street
- Butcher Supply Shop (former Firestone Auto/USA Auto), 1715 W Commerce Street
- Coyote Express/Diamond Shamrock, 1602 W Commerce Street
- CD Tire Corporation, 1503 W Commerce Street / 105 N Colorado Street

Further assessment of environmental conditions, including additional research and, if necessary, Phase II investigations, should be conducted to evaluate and address any potential environmental concerns associated with these properties.

3.8 Noise/Vibration

Document whether the Project has the potential for noise or vibration effects.

A noise and vibration impact analysis were conducted for the Project in accordance with the FTA's Transit Noise and Vibration Impact Assessment Manual (FTA Manual) (2018). The analysis indicates that the Project is not expected to result in any operational noise or vibration impacts. Details of the noise and vibration assessment are provided in the **Noise and Vibration Impact Assessment Report** in **Appendix I**.

Identify receptors within the screening distance.

The FTA Manual classifies noise-sensitive land uses into three categories:

- Category 1: Tracts of land where quiet is an essential element in their intended purposes.
- Category 2: Residences and buildings where people normally sleep.

  Category 3: Institutional land uses with primarily daytime and evening use.

Using the FTA Manual as guidance, noise-sensitive receptors within 500 feet of the Project corridor were identified including Category 2 and Category 3 land uses; no Category 1 receptors were identified.

Describe effects, proposed mitigation measures, and remaining effects after mitigation.

Noise Impacts

A noise impact assessment was conducted using the FTA General Noise Assessment procedures described in Section 4.4 of the FTA Manual. Noise measurements were taken at twenty-four sensitive locations along the corridor to represent existing noise conditions at the nearest receptors. Project noise from ART operations was then predicted using FTA source reference levels, preliminary engineering plans, and information on speeds, headways, and vehicle types. FTA noise criteria were applied to determine whether the predicted noise increase will result in an impact. The noise impact assessment indicated that no noise impacts are anticipated from operations of Project. Details are provided in the **Noise and Vibration Impact Assessment Report** in **Appendix I**. Details of the noise and vibration assessment are provided in the **Noise and Vibration Impact Assessment Report** in **Appendix I**.

Vibration Impacts

Existing and future vehicle vibration generated by the Project are not anticipated to generate perceptible levels of vibration at surrounding land uses. As such, no vibration impacts are anticipated during operation of the Project.

Mitigation

The Project is predicted to have no noise and vibration impacts from operations of the Project. Therefore, noise and vibration mitigation measures will not be required. Construction impacts and mitigation are detailed in **Section 3.16**.

3.9 Floodplain Effects

Document compliance with U.S. Department of Transportation (USDOT) Order 5650.2, Floodplain Management and Protection, as revised.

The Project area crosses 100-year floodplains (see the Floodplains Map in Map in the **Natural Resources Report** provided in **Appendix J**). The Project is subject to Executive Order 11988 on Floodplain Management. However, because most Project activities involve restriping with minimal construction on already disturbed or paved areas within the floodplain, it will not significantly encroach on the floodplains or disrupt transportation facilities. Overall, it is not anticipated to increase the potential for property loss or increase the potential for hazard to life within the floodplain.

3.10 Biological Resources

Describe if there are any species located within the Project vicinity that are listed as threatened or endangered under the Endangered Species Act.

A **Natural Resources Report** (**Appendix J**) has been prepared to determine the potential effects on biological resources. VIA reviewed the United States Fish and Wildlife Service (USFWS) and the Texas Parks and Wildlife Department (TPWD) databases and identified several federally and state-listed species with potential to occur within the Project area. However, the Project is located in densely developed urban area, where habitat is limited and generally unsuitable for most of these identified species.

Document project effects on protected wildlife and plant species and/or their habitats.

The Project activities are not expected to affect any federally or state-listed species. While habitats within the Project area are likely suitable for some migratory bird species, long-term maintenance activities will include mitigation measures to ensure a “no take or kill” outcome for

all migratory birds. No suitable habitat for Bald Eagles, which are protected under the Bald and Golden Eagle Protection Act, exists within the Project area.

A desktop review and field survey identified a few trees that may qualify as significant or heritage trees under COSA's Tree Preservation Ordinance. A detailed survey will be conducted after environmental clearance to confirm species and assess potential impacts. If protected trees may be affected, mitigation measures will be implemented.

The short-term construction impacts and mitigation measures for biological resources are described in **Section 3.17 Construction Effects** of this document.

Describe any critical habitat, essential fish habitat or other ecologically sensitive areas within or near the Project area.

According to USFWS IPaC and the National Oceanic and Atmospheric Administration (NOAA), there are no critical habitats or essential fish habitats within the Project area. The Project is located in Karst Zone 4b (USFWS, 2024), so a full geologic or karst survey was not required. The Project area is also located more than 500 feet from higher-priority Karst Zones or Karst Fauna Regions.

3.11 Water Resources

Document that requirements of the Clean Water Act have been met.

VIA assessed the Project's compliance with the Clean Water Act (CWA), which regulates activities that discharge into Waters of the U.S. (WOTUS) and activities within impaired waters. Overall, the Project is not anticipated to involve any regulated activities within any WOTUS, including wetlands. A permit from the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA is not anticipated. Furthermore, since this Project will not require a permit under Section 404 of CWA, it is not required to comply with Texas Commission on Environmental Quality (TCEQ) Water Quality Certification project. Moreover, a stormwater pollution prevention plan (SWP3) will be developed to ensure that the Project will comply with Section 402 of CWA and to prevent any temporary impacts to water quality.

Describe the Project's potential to affect water quality, including during construction.

Given the minimally disruptive nature of the long-term operational activities of the Project, surface water, groundwater, and overall water quality are not anticipated to be significantly impacted. The Project's proposed short-term activities mostly involve ART station upgrades and new installations, lane widening, drainage improvements, and restriping efforts with minimal

construction taking place on previously disturbed or paved areas outside of the existing water crossings. However, construction activities are temporary and SWP3 mitigation measures will be implemented to minimize and avoid such temporary impacts.

Describe potential effects and best management practices that will be in place.

During the field survey, VIA identified seven National Hydrography Dataset (NHD) stream segments and one unlisted stream segment within the Project area. Maps depicting water resource within the Project area can be found in the **Natural Resources Report** in **Appendix J**

The Project is not anticipated to impact any of the streams identified within the Project area because there will be no work proposed at the water crossings. The Project is not anticipated to impact on any regulated wetlands, given no wetlands were observed within the Project area.

The Project will not involve constructing any obstacles in any port, harbor, canal, navigable water, or other U.S. waters located outside fixed harbor lines or in areas where no harbor line exists. There will be no construction, expansion, alteration, or modification of bridges or any other USACE Civil Works as part of the proposed work. Thus, the Project is not anticipated to require any authorization or permitting under the Rivers and Harbors Act of 1899.

Since no significant impacts or encroachment of water resources are anticipated in the long-term operation of the proposed Project, no mitigation measures are recommended.

Water quality may be affected temporarily in the short term, but this is the only potential impact to water resources overall. SWP3 mitigation measures will be implemented during the construction phase. These measures may include, but are not limited to, silt fences, sediment traps, and/or erosion control logs.

Will there be an increase in new impervious surface or restored pervious surface?

The Project is anticipated to add approximately 0.5 acre of impervious surface through construction of sidewalks in new locations over disturbed, mowed and maintained grassy areas.

Describe potential effects and proposed treatment for storm water runoff.

For stormwater runoff, a SWP3 will be developed to ensure that the Project will comply with Section 402 of CWA and to prevent any temporary impacts to water quality. SWP3 mitigation measures will be implemented during the construction phase. These measures may include, but are not limited to, silt fences, sediment traps, and/or erosion control logs.

Document whether the Project will affect on-site or adjacent wetlands. Include any findings by the U.S. Army Corps of Engineers.

The National Wetland Inventory (NWI) data depicted riverine wetland types at all water crossings within the Project area. The NWI Map can be found in the **Natural Resources Report** provided in **Appendix J**. However, during the field survey, VIA did not observe wetlands within the Project area.

Is the Project located near an EPA-designated sole source aquifer? Provide the name of the aquifer which the Project is in and describe any potential effects to the aquifer. Also, include the approximate amount of new impervious surface created by the Project.

The Project is located near the Edwards Aquifer, which is a sole source aquifer (SSA). The Edwards Aquifer Map can be found in the **Natural Resources Report** provided in **Appendix J**. The San Antonio River crosses the Project area and is fed by spring waters from the Edwards Aquifer. Given the minimally disruptive nature of proposed Project activities within floodplains and around water crossings, groundwater and overall water quality are not anticipated to be significantly impacted.

The Project is anticipated to add approximately 0.5 acre of impervious surface. Appropriate drainage treatment measures will be implemented to manage stormwater runoff from the new impervious areas.

3.12 Visual and Aesthetics Effects

Describe the Project's effects on the existing visual/aesthetic character or quality of the site, its surrounding, and/or recognized view sheds.

The Project corridor is an active urban street with numerous modern features that define its visual character, including existing transit stops, street lighting, traffic signals, signage, utility poles, and other common streetscape elements. These contribute to the corridor's already complex visual environment.

Adjacent land uses include commercial, residential, urban open space, and industrial areas. The inventory of visual resources considers the area of visual effect—the area where the Project corridor is visible—shaped by surrounding topography, vegetation, and structures. Key views within the corridor include both representative streetscapes and notable architectural landmarks—structures or features of aesthetic, artistic, cultural, or historical interest. Two primary viewer groups were considered:

- Neighbors: Viewing the corridor from adjacent properties

- Travelers: Experiencing the corridor while moving through it

The Project will introduce 18 new or modified stations with platforms, shelters, canopies, seating, signage, lighting, and other streetscape improvements. Stations will be located along the roadway, consistent with existing VIA bus stops, designed with local aesthetic considerations, and will not substantially change the visual setting for neighbors or travelers. Additionally, the stations and transit traffic will not result in substantive changes to the visual setting of historic properties (see **Section 3.5** for details).

3.13 Utilities and Energy

Describe any relocation to utility lines or facilities and identify the responsible party.

Along the Project corridor, there are 18 utility owners, including providers of telecommunications, water and sanitary sewer, gas, and electric services. The design may require the relocation of certain telecommunication lines, gas lines, electric lines and water pipelines to accommodate proposed improvements. VIA will be responsible for ensuring proper relocation of utilities throughout the construction phase.

Describe coordination done with utility providers.

To date, coordination with utility owners has involved regular communication through emails, monthly project updates distributed to utility companies, geographic data shared by the utility owners, and dedicated project meetings with utility representatives, including a page-by-page review of anticipated utility conflicts. VIA will execute utility relocation reimbursement agreements with utility owners, comparable to those for the ART North/South Corridor Project. Coordination with all utility companies will continue throughout the detailed design and construction phases.

Describe the energy requirements and conservation potential of the Project.

The Project is designed to improve energy efficiency and reduce overall energy consumption through several measures:

- Efficient Vehicle Technology: The Project will use compressed natural gas (CNG) buses along the corridor. Improved Transit Operations: ART features—including dedicated transit lanes, transit signal priority (TSP), and limited-stop service—reduce idling, stops, and delays, allowing buses to operate more efficiently and use less energy per passenger mile.

- Increased Transit Ridership: By providing faster, more reliable, and convenient service, the Project is expected to attract more riders from private vehicles, which reduces overall energy consumption and emissions from single-occupancy vehicle trips.
- Optimized Traffic Flow: Coordinated signal priority and dedicated lanes improve corridor traffic flow, reducing fuel waste from congestion and stop-and-go traffic.

Overall, the Project is anticipated to conserve energy by increasing the efficiency of transit operations, encouraging mode shift from private vehicles, and employing clean, efficient vehicle technology.

3.14 Safety/Security

Describe all measures that will be taken to ensure the safe and secure operation of the Project (e.g., pedestrian and traffic hazards, as well as user and employee security issues).

The long-term operational activities of the Project are not expected to negatively affect the safety or security of pedestrians, cyclists, motorists, transit users, or transit employees. On the contrary, the Project has the potential to enhance safety and security throughout the corridor.

Key safety improvements include:

- Dedicated transit lanes, sidewalks, and bicycle lanes, along with curb repairs, ADA ramps, pedestrian signals, and traffic signals (from guy wires to mast arms), collectively reduce hazards for all roadway users.
- Proposed medians and intersection restriping, which may lower crash risk and improve pedestrian safety.
- Bus stations with pedestrian walkways, lighting, shelters, security cameras, and emergency blue light phones, contributing to a safer environment for transit users.
- Dedicated transit lanes, which allow buses to safely stop without disrupting traffic and can be used by emergency vehicles or other vehicles during incidents such as crashes or severe weather events.

Additionally, VIA reviewed COSA's Vision Zero Action Plan (2024) and incorporated relevant treatments into the Project design. Crime Prevention Through Environmental Design (CPTED) principles were also applied to further enhance safety and security considerations. Additional details on safety and security are provided in the **Community Impacts Analysis Report (Appendix B)**.

3.15 Construction Effects

Describe temporary effects associated with construction activities, such as noise, air quality, sidewalk and road closures, traffic detour/access change, construction schedules.

Noise

Construction of the Project will require the use of heavy equipment that generates relatively high noise levels. The noise levels generated by construction equipment vary greatly on factors such as the type of equipment, the equipment model, the operation being performed, and the condition of the equipment.

The Project construction noise will be temporary and intermittent and will cease once construction is complete. All construction activities will be carried out in compliance with specifications and the applicable noise limits of the City of San Antonio Code of Ordinances.

Vibration

Construction of the Project may generate temporary vibration from the use of heavy equipment and machinery. Pile driving, which typically produces the highest levels of vibration at sensitive receivers, is not anticipated to occur during construction. Annoyance from ground borne noise and vibration is generally not an issue because of the short-term duration of most construction activities, and the main concern is potential damage to buildings. It is not expected that the construction of the Project will result in ground borne vibration levels of 0.3 in./sec peak particle velocity (PPV) or greater, resulting in a potential damage risk to the buildings along the corridor.

Hazardous Materials

Construction of the Project has the potential to encounter hazardous materials in soils, groundwater, or existing infrastructure. Impacts may include exposure risks to workers, soil and water contamination, and the need for specialized handling and disposal.

Safety and Security

Construction activities may temporarily exacerbate traffic flow conditions throughout the corridor, which may pose a safety and security threat for pedestrians, cyclists, motorists, transit users, or transit employees. There could be a higher risk for crashes in heavily congested areas. Emergency response times may be delayed slightly due to the temporarily exacerbated traffic flow conditions.

Biological Resources

Short-term construction activities may affect protected species through the potential destruction of nests, dens, or homes, and may cause injury or death. Vegetation removal could impact habitats for migratory birds in the area. Construction may also affect significant and/or heritage trees as defined by the COSA. A closer inspection of trees will be needed post environmental clearance and finalization of design elements to verify the exact species of each tree with qualifying DBH and to determine if they will in fact be impacted by construction.

Water Resources

Although construction will occur outside existing water crossings, it could temporarily affect water quality through stormwater runoff, erosion, and sedimentation.

Cultural Resources

Construction of the Project may result in temporary impacts to above-ground historic properties, including effects on their visual context, or access. Underground archaeological resources may be affected by ground disturbance, excavation, or grading, which could unintentionally damage or destroy subsurface cultural materials, including artifacts, features, or human remains.

Describe mitigation measures to address the impacts.

Noise

The contractor will develop a Noise Control Plan demonstrating how the local ordinance construction noise limits can be achieved. The Noise Control Plan must be approved by VIA prior to initiating construction. If construction is planned during nighttime hours from 10:00 p.m. and 7:00 a.m., Sundays or legal holidays, the contractor will need to obtain a noise variance. Construction noise-reducing methods that may be implemented, as necessary, include the following:

- Use low-noise emission equipment
- Use broadband backup warning devices on all vehicles
- Implement noise-deadening measures for truck loading and operations
- Conduct monitoring and maintenance of equipment to meet noise limits
- Use acoustic enclosures, shields, or shrouds for equipment and facilities
- Install high-grade engine exhaust silencers and engine-casing sound insulation
- Minimize the use of generators

- Use movable noise barriers at the source of the construction activity

Vibration

Building damage from construction vibration is not anticipated due to the type of construction and the distances to nearby structures; therefore, no mitigation measures are expected to be required.

Hazardous Materials

During construction, contractors will be advised of the following requirements for hazardous materials:

- If hazardous materials are used during construction, they will be required to be managed and disposed of according to applicable rules and regulations.
- Accidental hazardous material spills will be reported, contained, and remediated using safe work practices to prevent contamination.
- If unanticipated hazardous materials are encountered, work will stop in the affected location until appropriate hazardous material specialist can document, contain, and remediate the location using safe work practices.
- Prior to moving or altering transformers, the owner and/or utility should be contacted to inquire about the polychlorinated biphenyls (PCB) content of the transformer fluids.

Safety and Security

To maintain traffic flow conditions, detours with alternative routing and appropriate signage will be provided to maintain access for pedestrians, bicyclists, motorists, transit users, and transit employees. Street and intersection closures will be limited in duration to prevent exacerbation of traffic conditions. Detailed maintenance of traffic plans will be developed during final design in coordination with COSA Department of Public Works (DPW) to ensure safety during construction and to ensure that emergency vehicle access is not impeded.

Biological Resources

The potential short-term effects to protected species will be mitigated through implementing the following recommended mitigation measures during construction:

- Tree removal, especially removal of oak trees, palm trees, and other landscaped deciduous trees within the project area, should be avoided to the extent practicable for construction.

- Disturbance (beyond regular mowing and maintenance of grassy areas) should be limited to those areas where paving and construction of the Project is required.

Given the migratory birds with potential for occurrence in the Project area, VIA will implement short-term mitigation measures to ensure that all migratory bird species will have a “no take or kill” call. Short-term mitigation measures will include:

- Avoiding removal or destruction of active bird nests except through federal or state approved options.
- Avoiding construction activities during breeding season if possible.
- Using measures to prevent or discourage birds from building nests on man-made structures within portions of the project area planned for construction.
- Minimizing project creep by clearly delineating and maintaining project boundaries (including staging areas).
- Maximizing use of disturbed land for all project activities (i.e., siting, lay-down areas, and construction).
- Implementing standard soil erosion and dust control measures. This may include:
    - Establishing vegetation cover to stabilize soil
    - Using erosion blankets to prevent soil loss;
    - Watering bare soil to prevent wind erosion and dust issues

To the extent practical, VIA will refine design to completely avoid and/or minimize impacts to trees identified as significant and heritage trees under COSA’s Tree Preservation Ordinance. If the design is unable to avoid impacts to protected trees, VIA will coordinate with COSA and follow all applicable requirements.

Water Resources

A SWP3 will be included in the plans to ensure that the proposed Project will comply with Section 402 of CWA. The mitigation measures given in SWP3 will be implemented during the construction phase. These measures may include, but are not limited to, silt fences, sediment traps, and/or erosion control logs. Since no significant effects/impacts or encroachment of water resources are anticipated, no other mitigation measures besides those in the SWP3 are recommended.

Cultural Resources

To minimize potential effects, construction near historic properties will be carefully managed. Mitigation measures include vibration monitoring and protective barriers for above-ground resources. For underground archaeological resources, monitoring will be conducted in high-probability areas, with professional archaeologists present during excavation and the authority to halt work if cultural materials are encountered. Additionally, a Construction Monitoring and Inadvertent Discovery Plan, developed in consultation with FTA and THC, will guide actions if archaeological materials or human remains are uncovered during construction.

3.16 Public Involvement

Public involvement activities conducted under the NEPA process also satisfied the public involvement requirements of Section 106. During these community meetings and outreach efforts, project information—including potential effects on historic properties—was shared with the public, and opportunities were provided to comment. Feedback received through these efforts was considered as part of the Section 106 consultation process.

Three series of Community Conversations occurred between January 2024 and July 2025:

- The first series occurred in January 2024 at three locations along the corridor with a total of 119 attendees. Residents and stakeholders were informed about the preliminary Project plans and given the opportunity to provide input. As of part of Section 106 process, VIA provided an interactive environmental map of the Project area showing existing environmental resources, including cultural resources, and gathered input from the public on known or potential cultural resources.
- The second series was held in September 2024, also at three corridor locations with total of 76 attendees, where residents and stakeholders offered additional comments and feedback on the preliminary design and proposed station locations. During the meeting, VIA introduced the Section 106 process and continued public related to cultural resources in the Project area.
- The third series took place in June and July 2025 at three locations along the corridor with total of 121 attendees. During these meetings, residents and stakeholders received updates on revisions to the preliminary design made in response to earlier public input, including adjustments to station sizing and locations to better align with community

feedback. For Section 106 purpose, VIA also provided updates on the progress of the cultural resources effects assessment and Section 106 consultation.

In addition to Community Conversations, VIA has actively sought meetings with stakeholders such as community organizations, businesses, and neighborhood associations. VIA conducted grass-roots outreach along the entire corridor to businesses and residents. VIA also launched a project-specific website, where public meeting materials were published ahead of the meetings and where the public can provide feedback at any time.

Major feedback themes received through written comments and on-site dialogue included:

- Support for the proposed Project
- Questions and discussions around VIA's Better Bus Program
- Request for secure bicycle facilities/amenities at stations and on buses
- Safety and security concerns focused on areas near the stations
- Request for more frequency on existing routes
- Request for more accommodations for the deaf
- Concerns about pedestrian safety on sidewalks and access to the stations.
- Recommendation for wider sidewalks, sidewalk improvements, more tree shade along sidewalks leading up to station and traffic calming measures.
- Concern about potential displacement for nearby residents, rise in property taxes, construction and overall impact on businesses.
- Recommendation to create design of stations according to cultural distinction.
- Concerns about distance between stops along the corridor, particularly near the H-E-B on the Westside and in relation to the mobility of the aged population.
- Desire for lighting around VIA Rapid stations and transit centers.
- Concern for parking at transit centers.
- Request for bicycle and other multi-modal connectivity to bus stops.
- Need for quicker, more dependable public transportation.
- Appreciation for the project team's informational support at the public meetings.

VIA addressed community concerns by updating the Project design to improve pedestrian safety and access at stations to include signals, crosswalks, sidewalks, and lighting; provide bicycle accommodations on stations and buses; moving the Zarzamora Street station east so that it is closer to the H-E-B on W. Commerce Street on the Westside; moving the 24th Street Station two blocks east to Picoso Street to adjust the station spacing; and providing access to trail connections at Apache Greenway and Commerce Street Greenway. VIA will continue to provide opportunities for meaningful public engagement as the Project advances. Community outreach efforts are detailed and analyzed further in the VIA ART East/West Corridor Project Community Conversation Summary Report (VIA 2025).

In addition to engaging the public, VIA coordinated closely with its partner agencies for the Project. A Technical Advisory Committee (TAC) was established in September 2024 to involve partner agencies throughout the 40% design process, including COSA, Bexar County, CPS Energy, and AAMPO. Three rounds of TAC meetings were conducted:

- The first meeting, held on September 6, 2024, introduced the Project and highlighted upcoming community conversations in September 2024.
- The second meeting, held on October 11, 2024, provided an update on feedback received from the September community conversations and reviewed the conceptual design at each station with TAC members.
- The third meeting, held on January 17, 2025, provided an update on the 40% design development, including design refinements, NEPA progress, and stakeholder engagement.

VIA conducted additional TAC meetings, which only included attendees specific to certain disciplines, including stormwater, traffic, utilities, vision zero, bicycle amenities, pedestrian access and ADA. In addition to TAC meetings, VIA coordinated with COSA on the 40% design review. VIA will continue to engage with its partner agencies as the Project progresses.

3.17 Mitigation Measures

Describe any measures taken that avoid, minimize, or compensate for effects caused by the project and steps that will be taken to monitor mitigation measures.

All mitigation measures discussed in previous sections will be implemented during construction and long-term operations.

A Mitigation Monitoring Plan (MMP) will be developed as part of the VIA ART E/W Corridor Project Management Plan (PMP) to ensure that all mitigation measures identified in the previous sections are properly implemented, tracked, and documented throughout project development and construction. The MMP will outline the specific commitments made during the environmental process, identifies responsible parties, establishes timing for implementation, and defines methods for verification and reporting.

To facilitate coordination and oversight, VIA will maintain a Mitigation Tracking Matrix summarizing all required measures by resource area (e.g., noise, visual, cultural, biological, air quality). This matrix will be updated as the project advances and serves as the central reference for both internal staff and external partners.

Mitigation measures and their implementation status will be communicated to the Project Management Oversight Contractor (PMOC) through:

- Regular project progress meetings and environmental compliance updates.
- Submittal of the Mitigation Tracking Matrix or summary table as part of milestone reporting.
- Direct coordination with the PMOC environmental representative when measures require verification or field observation.

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5 ACRONYMS

Acronym/Abbreviation	Definition
AAI	All Appropriate Inquiries
AAMPO	Alamo Area Metropolitan Planning Organization
ACT	Antiquities Code of Texas
ADA	Americans with Disabilities Act of 1990
APAR	Affected Property Assessment Report
APE	Area of potential effect
ART	Advanced Rapid Transit
ASL	Spanish and American Sign Language
ASTM	American Society for Testing and Materials
BAT	Business Access and Transit
BGEPA	Bald and Golden Eagle Protection Act
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CE	Categorical Exclusion
CFR	Code of Federal Regulations
CIG	Capital Investment Grant
CNG	compressed natural gas
COSA	City of San Antonio
CPTED	Crime Prevention Through Environmental Design
CWA	Clean Water Act
CRIS	Crash Records Information System
DBH	diameter at breast height (in reference to trees)
Downtown	Central Business District
DPW	Department of Public Works
Existing Roadways	No Build Alternative
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EO	Executive Order
E/W	East/West
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FTA Manual	Transit Noise and Vibration Impact Assessment Manual
GHGs	greenhouse gases

Acronym/Abbreviation	Definition
GIS	Geographic Information System
IHW	Industrial and Hazardous Waste
IPaC	Information for Planning and Consultation
LOS	Levels of Service
LWCF	Land and Water Conservation Fund
MMP	Mitigation Monitoring Plan
MOU	Memorandum of Understanding
MSATs	mobile source air toxics
MTP	Metropolitan Transportation Program
Multimodal Plan	San Antonio Tomorrow Multimodal Transportation Plan
NAAQS	National Ambient Air Quality Standards
NHPA	National Historic Preservation Act
NHD	National Hydrography Dataset
NOAA	National Oceanic and Atmospheric Administration
N/S	North/South
NEPA	National Environmental Policy Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
OHP	Office of Historic Preservation
TxDOT PALM	Texas Department of Transportation Potential Archeological Liability Maps
PCB	Polychlorinated biphenyls
PHB	pedestrian hybrid beacon
PD	Project Development
PMP	Project Management Plan
PPV	peak particle velocity
RAIL	Rapid Avian Information Locator
REC	Recognized Environmental Condition
ROW	Right-of-Way
SA Tomorrow	San Antonio Tomorrow
SALs	State Antiquities Landmarks
SIP	State Implementation Plan
SSA	sole source aquifer
SWP3	stormwater pollution prevention plan

Acronym/Abbreviation	Definition
TCEQ	Texas Commission on Environmental Quality
THC	Texas Historical Commission
TIP	Transportation Improvement Program
TPH	total petroleum hydrocarbons
TPWD	Texas Parks and Wildlife Department
TSP	transit signal priority
TxDOT	Texas Department of Transportation
Uniform Relocation Act	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
U.S.	United States
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
UTSA	University of Texas at San Antonio
VIA	VIA Metropolitan Transit
VMT	vehicle-miles-traveled
WOTUS	Waters of the U.S.

Appendix A: Project Location Map

Appendix B: Community Impact Analysis Report

Appendix C: Traffic Operations Analysis Report

Appendix D: Air Quality Analysis Report

Appendix E: Above-Ground Historic Resources Survey Report

Appendix F: Archaeological Desktop Overview

Appendix G: Construction Monitoring, Mechanical Scraping and Inadvertent Discovery Plan

Appendix H: Phase I Environmental Site Assessment Report

Appendix I: Noise And Vibration Impact Assessment Report

Appendix J: Natural Resources Report

QUESTIONS?

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