San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

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September 23, 2022

Mr. Timothy Johnston, MP, Senior Environmental Planner
Environmental Planning Division
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

RE: CEQA Categorical Exemption Request
Water Radio Replacement – East Bay Regional Network Sites
Project No.: 10015118
COA: 10015118 0001 26570 232146 15514

Dear Mr. Timothy Johnston:

The San Francisco Public Utilities Commission (SFPUC) requests review of the proposed Water Radio Replacement – East Bay Regional Network Sites (Project) under the California Environmental Quality Act (CEQA). The SFPUC requests San Francisco Planning Department – Environmental Planning Division (EP) concurrence that the proposed Project is categorically exempt under CEQA Sections 15301 Class 1 (Existing Facilities) and 15302 Class 2 (Replacement or Reconstruction). Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Class 2 consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The following analysis demonstrates the proposed Project would not result in adverse environmental effects and provides support for our recommendation that it is categorically exempt under CEQA. The Project would be conducted in compliance with applicable federal, State, and local regulations and under contractual provisions prohibiting work in violation of applicable regulations and plans.

BACKGROUND

The SFPUC Water Enterprise radio system is antiquated and needs to be

replaced and expanded at some locations for better coverage. As part of an overall effort, the SFPUC plans to replace dated radio infrastructure along its entire system to provide better communications and coverage needed for the maintenance of the infrastructure, safety of personnel, and to prepare for natural and man-made disasters, and add radio sites to gain coverage in areas not previously covered.

By design, the overall Water Radio Replacement Project is divided into four independent radio networks: Hetch Hetchy Water and Power Region network, East Bay Region network, West Bay Region network, and City Region network. Each regional network consists of several radio sites that provide reception and overlap of reception to provide what is called “coverage”. The radio facilities within each of these regional networks can work cohesively or independently from each other. Thus, if a regional network or an individual radio site were to fail or not be upgraded, the other networks and radio sites would provide some redundancy and continue to offer some percentage of coverage. If all the networks and radio sites are upgraded over time as planned, they would cover 90% of the SFPUC’s infrastructure and access routes. If some sites are not built, coverage would be less; however, upgrades at each site would still be an improvement to the SFPUC’s communication system in and of itself. The individual radio site improvements are also neither dependent upon nor necessitate improvements at other sites. Therefore, each regional network and each radio site within them has independent utility. As such, it is acceptable to request separate environmental review of the networks and even of individual sites.

The Hetch Hetchy network sites were approved in August 2022 (Case No. 2022-006240ENV). Currently, the SFPUC requests environmental review of the radio sites in the East Bay Region network. The SFPUC will request environmental review of other radio sites at a future time and no work will occur at those locations until then.

PROJECT DESCRIPTION

The Project involves work at seven existing sites as described below and shown in Table 1. All the sites are in Alameda County, except for the Corral Hollow and Thomas Shaft sites, which are in San Joaquin County. The sites are existing and fenced facilities and are either developed, fully or partially graded and graveled, or comprised of natural exposed rock and gravel.

A detailed description of the proposed Project components and activities,

ground disturbance, and land ownership at each site is provided in Table 1. Where not SFPUC property, the radio equipment proposed by this Project would be authorized within the SFPUC's leases with these entities. Ground disturbance would only occur at the Corral Hollow and Thomas Shaft sites. Construction at the Corral Hollow and Thomas Shaft sites would be completed in approximately thirty working days and forty-five working days, respectively.

Duration and Schedule
The Project would be initiated upon completion of environmental review and construction contract approval and award. Construction of all the sites would be completed in approximately 17 weeks, or 120 working days. Project activities would primarily be conducted between 7:00 a.m. to 5:00 p.m. Monday through Friday.

Equipment and Personnel
Construction would be completed using only hand tools, except for the Corral Hollow and Thomas Shaft sites, which would require use of a backhoe, rammer, vibratory plate, trencher, drill rig, a mobile 15-ton crane mounted to a rubber-tired truck, and a bucket truck. Four to six crew members are expected to be onsite during construction at each site. Additionally, the contractor's supervisor and an SFPUC engineer and/or technician would be on site to provide oversight for each site. Approximately eight passenger vehicles would be used to transport work crew members, the contractor's supervisor, and SFPUC engineer/technician to and from the site each day.

Site Access and Staging
Access to the Project sites would be via existing public roads that are paved, dirt, and gravel roads. Trucks and equipment would park at the Project sites.

SFPUC STANDARD CONSTRUCTION MEASURES

The SFPUC requires the Standard Construction Measures issued July 1, 2015 (on file at the Environmental Planning Division) be implemented for all projects, as applicable. These measures would be applied to this Project as well.

ENVIRONMENTAL INFORMATION

Aesthetics

The Corral Hollow, Thomas Shaft, Crane Ridge, Sunol Ridge, Sunol Valley Water Treatment Plant, and Mt. Allison sites are in remote locations. Due to the remote locations of all these sites, construction activities would not be readily

Table 1 Proposed Project Details by Site Location

Site/Property Owner and Existing Site Conditions	Ground Disturbance	Antennae and Associated Equipment	Generator and Propane Tank	Other
Corral Hollow/Private (SFPUC to lease land and tower space) Commercial FM Radio Station, with a tower, cinder block communication equipment shelter, and generator with diesel fuel tank.	498 square feet; maximum 4 feet deep.	Install two vertical antennas, one panel antenna, and two 3-foot diameter dish antenna onto the existing 343-foot tower.	Install two propane tanks and an emergency backup generator on a new approximately 11-foot-long by 9.5-foot-wide by 1.5-foot-deep concrete pad with a manifold. Install a new underground approximately 0.25-inch propane fuel line from the new propane tanks manifold to the new generator in the new communication equipment shelter in an approximately 25-foot-long by 0.5-foot-wide by 1.5-foot-deep trench.	Install a prefabricated concrete communication equipment shelter with separate radio equipment and generator rooms on a new approximately 17-foot-long by 9-foot-wide by 0.5-foot-deep concrete pad and a new fence to encompass it. Install one 2-inch and one 4-inch electric conduit from existing PG&E service pole to the new communications equipment shelter in an approximately 143-foot-long by 0.5-foot- wide by 1.5-foot- deep trench. Construct an elevated cable tray with supports to carry the communication cables between the new radio communications shelter and the tower.
Thomas Shaft/SFPUC Water Treatment Facility, with a large building and several ancillary structures.	22 square feet; maximum 18 feet deep.	Install a 160-foot-tall communications tower, including tower foundation and fence. Install one 2-foot diameter dish antenna, one transit antenna or a bidirectional amplifier with receive and transmit antennas, and one lighting rod at the top of the new 160-foot-tall communications tower.	None.	Install new fence around the new tower.
Crane Ridge/Alameda County	None	Install three vertical	None.	Install microwave and radio

Site/Property Owner and Existing Site Conditions	Ground Disturbance	Antennae and Associated Equipment	Generator and Propane Tank	Other
(SFPUC to lease rack and tower space) Public safety Radio Station owned by Alameda County, with, one tower and antenna, a steel communication equipment shelter, and a generator with an integrated diesel fuel tank.		antennas, one 3-foot diameter dish antenna, and two 6-foot diameter dish antenna onto the existing 60-foot-tall tower.		communication equipment in two new racks and the supporting electrical, monitoring, and controls within the existing steel equipment shelter.
Sunol Ridge/Alameda County (SFPUC to lease rack and tower space) Public safety Radio Station owned by Alameda County, with, with towers and antenna, a cinder block and steel communication equipment shelters, and a generator with an integrated diesel fuel tank.	None.	Install two vertical antennas onto the existing 100-foot-tall tower and one 4-foot diameter dish antenna onto the existing monopole on the side of the existing steel r communication equipment shelter.	None.	Install microwave and radio communication equipment in three new racks and the supporting electrical, monitoring, and controls within the existing steel equipment shelter.
Mt. Allison/Private (SFPUC to least additional rack and tower space) Commercial and public safety Radio Station owned by Communications Control Inc., with several towers and antenna, steel communication equipment shelters, and a generator with an integrated diesel fuel tank.	None.	Install four vertical antennas onto the existing 150-foot-tall tower. Install one 10-foot diameter dish antenna, one 6-foot diameter dish antenna, and one 4-foot diameter dish antenna onto the existing 80-foot tower.	None.	Install an electrical manual transfer switch and receptacle for portable emergency power generation. Install microwave and radio communication equipment in two new racks and the supporting electrical, monitoring, and controls within the existing steel communication equipment shelter.

Site/Property Owner and Existing Site Conditions	Ground Disturbance	Antennae and Associated Equipment	Generator and Propane Tank	Other
Sunol Valley Water Treatment Plant/SFPUC Wastewater Treatment Plan with existing tower.	None	Install vertical antenna onto the existing 70-foot-tall tower Install a bidirectional amplifier in a communication rack on the existing tower.	None	None.
Sunol Yard Server Room and Sunol Communications Shop/SFPUC Shops and Equipment Yards.	None.	None.	None.	Install one Network Control Station (a computer) in the Sunol Yard Server room, with possible relocation to the Sunol Communication Shop yard off Main Street. At both locations, installation requires a radio network switch, router, and a dedicated console within existing buildings. If relocated to the Sunol Communication Shop yard, phone and fiber optic lines would be installed from an existing utility pole overhead approximately 15 to 20 feet to the existing building (no ground disturbance).

visible to the public and, in any event, would be temporary and short-term. Construction at the Sunol Yard Communication Shop site may be visible from Main Street; however, there are trees along the road that screen views of the site and work would be completed in approximately five working days. Therefore, adverse effects to aesthetics from construction are not anticipated.

Since the Project would replace existing equipment with similar equipment and/or install additional and similar equipment to what is already present at the sites and in inside structures in some cases, the newly installed Project components are largely anticipated to be visibly indiscernible.

At the Corral Hollow site, one small, prefabricated steel communication equipment shelter and two propane tanks would be installed next to the existing building structure. Although this new structure would be more visually discernable (than for example, an additional dish antenna on a tower), it would be consistent with the existing aesthetic character of the site.

At the Thomas Shaft site, the Project would install a 160-foot-tall tower to expand communications at this site where the only method of communication is currently over a copper phone line or through satellite. While the new tower would be taller than the other existing facilities at this site, it would be among existing water treatment facilities and utility poles and the site is in a very remote location with minimal public visibility (ranchers driving by). Therefore, adverse effects to the aesthetics character of the Corral Hollow and Thomas Shaft sites are not anticipated. Therefore, for the reasons discussed above, adverse effects to aesthetics from the Project are not expected.

Air Quality

Equipment for the Project construction would be limited to hand tools, except at Corral Hollow and Thomas Shaft sites where a backhoe, rammer, vibratory plate, trencher, drill rig, and a mobile 15-ton crane mounted to a rubber-tired truck would be used. Although construction would take approximately 35 days and 45 days to complete at these sites respectively, the use of fueled equipment would be less than 10 hours at each site. Given the limited equipment to be used, criteria air pollutant emissions during construction are reasonably expected to be minor and were thus not modeled. Ground disturbance would be limited to 411 square feet at the Corral Hollow site and 22 square feet at the Thomas Shaft site and would be completed within a few days at each site such that dust emissions during construction would be minor.

Two propane tanks and a new SFPUC emergency backup generator would be installed at the Corral Hollow site to power the new radio equipment to be installed in the shelter. The generator would be propane unlike the existing diesel generator because it burns cleaner than diesel fuel. The emergency backup generator would only be tested intermittently and use propane such that operational emissions would be negligible. As a result, the Project is not anticipated to result in a substantial increase in emissions during operation. After construction, the disturbed areas would be covered with gravel and rock similar to existing conditions, such that dust emissions are not anticipated to increase during operation of the sites.

Given the Project would generate minimal criteria air pollutant emissions during construction and operation and would generate only short-term and minimal dust emissions during construction, adverse effects on air quality are not expected.

Biological Resources

The Project sites are within previously disturbed or paved/gravel areas and there is no critical habitat present at any of the sites. The Project would not trim or remove trees or demolish buildings with eaves that could have nesting migratory birds or roosting bats. The Thomas Shaft, Sunol Ridge, Sunol Valley Water Treatment Plant, and the Sunol Yard Communication Shop sites are among trees that could provide habitat for nesting birds. Additionally, pallid bat (*Antrozous pallidus*) is known to occur in the Sunol Valley Water Treatment Plant site area.. It is unlikely that nesting birds and roosting bats, if present in the trees adjacent to the Sunol Ridge, Sunol Valley Water Treatment Plant, and Sunol Yard Communication Shop sites, would be adversely affected given the use of hand tools only at these sites.

However, at the Thomas Shaft site where some heavy equipment would be used, and out of an abundance of caution at the Sunol Ridge, Sunol Valley Water Treatment Plant, and Sunol Yard Communication Shop sites, in accordance with SFPUC Standard Construction Measure Number 7, if work would occur at these sites during the nesting season (February 15 to August 31) or at the Sunol Valley Water Treatment Plant site during the bat roosting season (April 15 through August 31), a qualified biologist would conduct a survey of the sites and the immediate surrounding area for active migratory bird nests (containing eggs or chicks or raptors showing mating behavior) and roosting bats. If present, measures would be implemented in consultation with the Project biologist to ensure active nests or roosts are not destroyed or

adversely affected, such as establishing work buffer zones, restricting certain types of activities, monitoring, or delaying activities until the young have fledged.

Additionally, the following special-status wildlife are known to generally occur in the Project areas (CNDDB, 2022):

- **Corral Hollow**: San Joaquin pocket mouse, California glossy snake (*Arizona elegans occidentalis*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylii*), least Bell's vireo (Vireo bellii pusillus), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), San Joaquin kit fox (*Vulpes macrotis mutica*), and western spadefoot (*Spea hammondii*)

- **Thomas Shaft**: Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), San Joaquin pocket mouse (*Perognathus inornatus*), coast horned lizard (*Phrynosoma blainvillii*), and California tiger salamander (*Ambystoma californiense)*

Although Townsend's big-eared bat has been observed in the Thomas Shaft site area, the site does not provide suitable habitat for Townsend's big-eared bat (typically caves, tunnels, mines, and buildings).

In accordance with SFPUC Standard Construction Measure Number 7, a qualified biologist would survey these sites and the immediate surrounding area to identify if any of these species are present. If species are present, measures would be implemented, in consultation with the Project biologist, to ensure the species are not adversely affected.

With the inclusion of these measures, adverse effects to biological resources are not expected.

Cultural Resources

The Project would not affect any built environment features except the existing lattice towers and existing concrete and steel communications equipment shelters within the sites. The existing shelters and towers were built in the 1950s and 1960s, although some shelters have been added over time and the tower at Corral Hollow was replaced in 2007 by the other communication equipment owners. Although the shelters and towers are greater than 50 years old, the Project would not modify the exterior of the shelters and the same type of equipment as already exists on the towers would be replaced or added.

Thus, the Project would not be anticipated to adversely affect these communications structures.

Only two Project sites, Corral Hollow and Thomas Shaft, would involve ground disturbance. As per consultation with the San Francisco Planning Department Archaeologist (Lentz, 2022), the Corral Hollow site has low sensitivity for prehistoric and historical resources. Prehistoric sensitivity is low because the Corral Hollow site it on top of a hill, there are no bedrock outcroppings, and the site does not have characteristics that would make it a prime hunting or transportation place. The site has low historic sensitivity because there is no evidence that it would have any deposits associated with ranching or subsequent activities per historical maps. The Thomas Shaft site was previously reviewed for pre-historic archeological resources and no existing sites were identified and it was determined that sensitivity for buried prehistoric resources at the site is low.[1] As per consultation with the San Francisco Planning Department Archaeologist (Lentz, 2022), because the previous evaluation is dated, the tower foundation would be deep, and there are known resources with the general area, including historic period use, cultural resource awareness training is required. Accordingly, SFPUC Standard Construction Measure 9, Archaeological Measure I (Unanticipated Discovery) is included in the Project to address the potential for archaeological discoveries during construction at the Corral Hollow and Thomas Shaft sites. This measure requires resources protection and assessment measures to be implemented in the event of a discovery during construction and requires on-site discovery training for the Thomas Shaft site. Archaeological Measure II (monitoring) and/or Archaeological Measure III (Testing/Data Recovery) would be implemented in the event of a discovery during construction. With the inclusion of this measures, adverse effects to archaeological resources are not expected.

Hazards and Hazardous Materials

Based on the State Water Resources Control Board (SWRCB) Geotracker and State Department of Toxic Substances Control (DTSC) Envirostor databases, there are no leaking underground (fuel) storage tank cleanup sites or other hazardous materials sites in the Project vicinity.

The SFPUC and its contractor would comply with SFPUC Standard Construction Measure Number 6, which requires the appropriate storage and

[1] San Joaquin Regional Water Quality Improvement Project (Final Environmental Impact Report, Case No. 2007.0427E)

handling of construction materials, including any hazardous materials (i.e., paints, fuel, etc.) while on site, as well as the appropriate treatment, containment, and removal of hazardous materials (i.e., soil, groundwater or vapor) should they be encountered during Project activities, which is unlikely given the absence of any known contamination sources and limited ground disturbance. Therefore, adverse effects related to hazardous materials are not expected.

Noise

Short-term and intermittent daytime noise would be generated by Project construction activities between 7:00 a.m. and 5:00 p.m. Monday through Friday, which complies with the allowable construction hours in the noise ordinances for Alameda County and San Joaquin County. Further, except for the Sunol Yard Communication Shop site as discussed below, there are no sensitive noise receptors near the sites that could be affected by noise.

The Sunol Yard Communication Shop site is located approximately 200 feet from a school and directly adjacent to a residence (approximately 50 feet). If the Network Control Station (a computer) is located at this site[2], it would be placed within the existing building and approximately15 to 20 feet of phone and communication lines would be installed from an existing utility pole to the building. This work would completed with a crew using a bucket truck and hand tools(no heavy equipment would be used), and the installation would take approximately five working days. Because any noise generated at this site would occur during daytime allowable construction house and would be minor and temporary and short in duration, adverse noise effects during construction are not expected

The only new noise source associated with operation of the Project would be the new emergency backup generator to be installed at the Corral Hollow site. This site is in a remote location such that there are no sensitive noise receptors that would hear the generator when it is tested intermittently.

Therefore, adverse noise effects from the Project are not expected.

Transportation

Traffic generated by the Project would be limited to a minimal number of

[2] Alternative as described in Table 1, the Network Control Station maybe installed at the Sunol Yard in the existing server room, which is among other Yard facilities and away from sensitive receptors.

vehicles (eight per day per site) using existing paved and dirt roads. Vehicles and equipment would be parked at the existing sites during construction. Based on the limited number of vehicles and equipment, short Project duration, and remote location of roads and sites, traffic delays are not expected. Therefore, adverse effects to transportation are not expected.

Water Quality

No construction would occur within waters of the United States or the State. Ground disturbance would be limited to two sites and would occur on rocky soil that is typically not susceptible to erosion. Project activities would not alter any drainage patterns or adversely affect water quality. Therefore, adverse effects to water quality are not expected.

CEQA COMPLIANCE/RECOMMENDATION

Based on the description of the proposed Project and evaluation above, the SFPUC recommends that it is categorically exempt under CEQA Sections 15301 Class 1 (Existing Facilities) and 15302 Class 2 (Replacement or Reconstruction). Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Class 2 consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

Sincerely,

Kimberly Stern Liddell

On Behalf of Karen E. Frye, AICP
Acting Manager, Environmental Management

Attachment 1: Water Radio East Bay Region Sites Locations Map

cc: Fonda Davidis, SFPUC Project Manager
Kimberly Liddell, SFPUC Environmental Construction Compliance Manger/Environmental Project Manager
Whitney Broeking, SFPUC Environmental Project Manager

Legend

Project Site -

Los Vaqueros Reservoir

HWY 580/205 Junction

Altamont Pass HWY 580

Corral Hollow Radio Site - 1067'

Dirrane Property - 1125'

Marcial Pk. 2269'

Mitchell Shaft

Del Valle Reservoir

Mocho Shaft

Thomas Shaft

Crane Ridge - 2945'

Sunol Ridge 2171'

Sunol Yard

San Antonio Reservoir

Indian Shaft

SVWTP Tower

Diversion Dam MW -1103'

Diversion Dam

Mt. Allison 2635'

Calaveras Reservoir

BDPL/SPRR Crossing

BDPL/HWY 85 Crossing

BDPL/San Thomas Aquino Creek Crossing

BDPL/HWY 101 Crossing

Hetch Hetchy Regional Water System

Services of the San Francisco Public Utilities Commission

Water Radio Replacement Project