



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

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July 7, 2008

POWER ENTERPRISE

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Bill Wycko
Environmental Review Officer
Major Environmental Analysis Section
San Francisco Planning Department
1650 Mission Street , Suite 400
San Francisco, CA 94103

RE: CEQA Exemption for Solar Photovoltaic Project at MUNI Ways & Structures Facility

Dear Mr. Wycko:

The Power Enterprise of the San Francisco Public Utilities Commission (SFPUC) has prepared the following project information on the proposed solar photovoltaic project at MUNI Ways & Structures Facility. Per the authority to issue Class 1 Minor Alteration exemptions for Solar Projects, granted to our office by SF Planning Department (Paul Maltzer letter of June 9, 2006), we believe the proposed project meets the test for exemption, with no unique or unusual environmental impact. Consequently, we request concurrence from your office.

Project Description

The SFPUC Power Generation Group is proposing to install a 168 kilowatt (kW) solar photovoltaic (PV) system on the roof of the MUNI Ways & Structures Facility, Building A, located at 700 Pennsylvania Avenue (see **Site Vicinity Map**) and owned by the City of San Francisco (Block 4167, Lot 010).

The MUNI Ways & Structures Facility, Building A is a two-story concrete structure built in 1966 and used for workshops/light maintenance and administrative offices. It is approximately 56,000 square feet in area. Weather protection for the roof is achieved by built-up roofing, which slopes at approximately 3 percent (see **Site Map** and **Site Photographs**).

The proposed installation of this system will reduce peak demand loads and the daily energy consumption for the MUNI complex and provide reliable, high quality power with minimal environmental impacts. The load for the facility is 52,560 kW hours per month.

There are two possible system designs, both of which use solar photovoltaic (PV) cells, and each with a total array size of 168 kW (DC-peak). The DC output from the PV modules will be converted to 480 volt 3-phase alternating current (AC) via a single inverter:

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- 1) The first design is a roof-integrated membrane with embedded poly or mono-crystalline solar PV cells installed on the facility's roof. The BIPV design would become part of the roofing structure and will allow for a low profile that will blend in to the existing building's profile. The BIPV system shall also provide thermal insulation and protect the roof membrane from harsh UV rays and thermal degradation, which reduces heating and cooling energy costs as well as extend the life of the roof.
- 2) The second design would be composed of rigid crystalline PV panels, mounted on a rack to allow rain to drain into the roof's gutters and provide easy accessibility for maintenance. This system would also provide thermal insulation and protect the roof from UV rays and thermal degradation.

All work, facilities, equipment, materials, and ongoing operation and maintenance would be in compliance with the requirements of SFPUC Power Department's specifications and safe practices.

The project is currently being designed and is scheduled to bid out in early Summer 2008, with construction commencing early Fall 2008. Construction will be for approximately two months.

Environmental Impacts

Population and Housing:

The proposed project would install a 168 kW PV solar system on the existing MUNI facility roof. The electric power generated by the solar system will be used to meet the facility's energy demands. Therefore, the proposed project would not induce population growth by serving new customers.

Aesthetics:

Visual: It is anticipated that a low profile tilted solar PV installation will be deployed at this site. The facility roof is not visible from the street or nearby buildings and is only partially visible from the hills to the west and southwest. Due to the low profile of the PV installation, and the non-glare features of the solar panels, it appears there would be no significant visual effects.

Transportation (during construction):

The proposed project would be constructed during normal daytime work hours. During the construction of the project, the facility would continue to function during its normal hours of operation. PV Modules would be stored offsite and scheduled in partial shipments for site delivery. It is anticipated that no public right-of-way would be infringed upon by work or storage of equipment. The potential construction traffic at the project site would be considered temporary and would not contribute more than

approximately 10 round-trip vehicles per day. Therefore, the project would not cause major traffic hazards or contribute to cumulative traffic increases in the area.

Noise:

The inverter and transformer cooling fans, etc. would be equipped with noise-dampening equipment; any noise generated would not exceed residential noise standards (refer to City & County of San Francisco Municipal Code, Police Code – Article 29: Regulation of Noise).

Hazardous Materials & Waste:

The proposed project would not increase the use or storage of any hazardous materials at this site. This site is not listed on any State or Federal environmental priority lists (such as Cortese or LUST). It is not expected that any hazardous materials will be encountered; however, if any abatement is required, SFPUC will use the Department of Public Work's Site Assessment and Remediation Division to fully abate any hazards prior to construction.

CEQA Compliance Determination

The proposed project and its associated construction would not require additional undeveloped land to be disturbed or the acquisition of new property. During the construction and upon completion of the construction of the project, the existing facility would continue to function during its normal hours of operation. Therefore, the SFPUC (per the Delegation of Categorical Exemption Authority for Solar Projects, as referenced above) has determined that the project meets the criteria for a categorical exemption under the following CEQA Section:

Section 15303, Class 3(d) - New Construction or Conversion of Small Structures: Water main, sewage, electrical, gas and other utility extensions, including street improvements, or reasonable length to serve such construction.

Should you have questions regarding the proposed project, please contact me at 415-554-1541.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING
CATEGORICALLY EXEMPT FROM ENVIRONMENTAL REVIEW

Sincerely,

John Doyle
John Doyle

Energy Generation Services
SFPUC Power Enterprise

CLASS 1(b) - Existing Facilities:

Existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.

Attachments: Fig. I: Site Vicinity Map

Vikoriya Wise

7/15/08.

Fig. 2: Site Map
Roof photos

Cc: Randall Smith, Utility Specialist, SFPUC
Darwin Helmuth, Utility Specialist, SFPUC
Viktoriya Wise, SF