PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. **15-0187**

WHEREAS, San Francisco Public Utilities Commission (SFPUC) staff developed a project description under the Water System Improvement Program (WSIP) for meeting water supply demands, otherwise known as Project No. CUW30201, San Francisco Westside Recycled Water Project, in the City and County of San Francisco, California; and

WHEREAS, The objectives of the Project are to construct a new recycled water treatment facility, pump station, underground reservoir and associated pipelines and that would produce and deliver up to 2 million gallons per day of recycled water for irrigation, lake fill, and other non-potable uses, to diversify the SFPUC's water supply portfolio and increase the use of local water supply sources; and

WHEREAS, A Final Program Environmental Impact Report (PEIR) was prepared for the WSIP and certified by the Planning Commission on October 30, 2008 by Motion No. 17734; and

WHEREAS, Thereafter, the SFPUC approved the WSIP and adopted findings and a Mitigation Monitoring and Reporting Program (MMRP) as required by California Environmental Quality Act (CEQA) on October 30, 2008 by Resolution No. 08-200; and

WHEREAS, The PEIR has been made available for review by the SFPUC and the public, and is part of the record before this Commission; and

WHEREAS, The Planning Department prepared an EIR for the Project that is tiered from the PEIR, as authorized by and in accordance with CEQA and the CEQA Guidelines; and

WHEREAS, On September 3, 2015, the San Francisco Planning Commission reviewed and considered the Final Environmental Impact Report (FEIR) for the Project in Planning Department File No. 2008.0091E, consisting of the Draft Environmental Impact Report (EIR) and the Responses to Comments document, and found that the contents of said report and the procedures through which the FEIR was prepared, publicized and reviewed complied with the provisions of the CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code, and found further that the FEIR reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Responses to Comments document contains no significant revisions to the Draft EIR, and certified the completion of said FEIR in compliance with CEQA and the CEQA Guidelines in its Motion No. M-19442; and

WHEREAS, The Planning Commission, also on September 3, 2015, adopted CEQA Findings, including a statement of overriding considerations and an MMRP by Motion No. M-19443. The Planning Department found the Project consistent with the General Plan on September 3, 2015; and

WHEREAS, This Commission has reviewed and considered the information contained in the FEIR, all written and oral information provided by the Planning Department, the public, relevant public agencies, SFPUC and other experts and the administrative files for the Project and the EIR; and

WHEREAS, The Project and FEIR files have been made available for review by the SFPUC and the public, and those files are part of the record before this Commission; and

WHEREAS, The Planning Department, Timothy Johnston, is the custodian of records, located in File No. 2008.0091E, at 1650 Mission Street, Fourth Floor, San Francisco, California; and

WHEREAS, SFPUC staff prepared proposed findings, as required by CEQA, (CEQA Findings) and a proposed MMRP, which material was made available to the public and the Commission for the Commission's review, consideration and action; now, therefore, be it

RESOLVED, That this Commission has reviewed and considered the FEIR, finds that the FEIR is adequate for its use as the decision-making body for the actions taken herein, and hereby adopts the CEQA Findings, including the Statement of Overriding Considerations, attached hereto as Attachment A and incorporated herein as part of this Resolution by this reference thereto, and adopts the MMRP attached to this Resolution as Attachment B and incorporated herein as part of this Resolution by this reference thereto; and be it

FURTHER RESOLVED, That the General Manager, or his designee, is authorized to apply for, accept and execute required approvals from State agencies, including but not limited to, California Regional Water Quality Control Board, California Department of Transportation, and California Coastal Commission, and any other regulatory approvals as required. To the extent that the terms and conditions of the necessary approvals will require SFPUC to indemnify other parties, those indemnity obligations are subject to review and approval by the San Francisco Risk Manager. The General Manager is authorized to agree to such terms and conditions that are within the lawful authority of the agency to impose, in the public interest, and, in the judgment of the General Manager, in consultation with the City Attorney, are reasonable and appropriate for the scope and duration of the required approval, as necessary for the Project; and be it

FURTHER RESOLVED, That this Commission hereby approves Project No. CUW30201, San Francisco Westside Recycled Water Project, and authorizes staff to proceed with actions necessary to implement the Project; provided, that staff returns to the Commission to seek: approval of necessary agreements with the Recreation and Park Department, Presidio Trust, California Army National Guard, and San Francisco Zoological Society; authorization for State Revolving Fund and State Water Recycling Fund financing; Board of Supervisor's approval, where required; and award of construction contracts.

I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of September 8, 2015.

Alona Hood

Secretary, Public Utilities Commission

Attachment A

San Francisco Westside Recycled Water Project

California Environmental Quality Act Findings: Findings of Fact, Evaluation of Mitigation Measures and Alternatives, and Statement of Overriding Considerations

San Francisco Public Utilities Commission

In determining to approve the San Francisco Westside Recycled Water Project ("SFRW Project" or "Project") described in Section I, Project Description, below, the San Francisco Public Utilities Commission ("SFPUC") makes and adopts the following findings of fact and decisions regarding mitigation measures and alternatives, and adopts the statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act ("CEQA"), California Public Resources Code Sections 21000 et seq., particularly Sections 21081 and 21081.5, the Guidelines for Implementation of CEQA ("CEQA Guidelines"), 14 California Code of Regulations Sections 15000 et seq., particularly Sections 15091 through 15093, and Chapter 31 of the San Francisco Administrative Code.

This document is organized as follows:

Section I provides a description of the Project proposed for adoption, the environmental review process for the Project (San Francisco Westside Recycled Water Project Environmental Impact Report, Planning Department Case No., 2008.0091E, State Clearinghouse No. 2008052133) (the "Final EIR" or "EIR"), the approval actions to be taken and the location of records;

Section II identifies the impacts found not to be significant that do not require mitigation;

Section III identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures;

Section IV identifies significant impacts that cannot be avoided or reduced to less-than-significant levels and describes any applicable mitigation measures as well as the disposition of the mitigation measures;

Section V evaluates the different Project alternatives and the economic, legal, social, technological and other considerations that support approval of the Project and the rejection of alternatives, or elements thereof, analyzed; and

Section VI presents a statement of overriding considerations setting forth specific reasons in support of the Commission's actions and rejection of the alternatives not incorporated into the Project.

The Mitigation Monitoring and Reporting Program ("MMRP") for the mitigation measures that have been proposed for adoption is attached with these findings as **Attachment B to Resolution No. 15-0187**. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. Attachment B provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project ("Final EIR") that is required to reduce or avoid a significant adverse impact. Attachment B also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in Attachment B.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the Draft Environmental Impact Report ("Draft EIR" or "DEIR") or the Comments and Responses document ("C&R") in the Final EIR are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

I. Approval of the Project

A. Project Description

By this action, the SFPUC adopts and implements the SFRW Project identified in the Final EIR. Specifically, the Project adopted by the SFPUC includes the following:

- Construction of a recycled water treatment plant at the SFPUC's Oceanside Water Pollution Control Plan (WPCP) and within a portion of the adjacent California Army National Guard site. Recycled water produced at this facility would be used in Golden Gate Park for irrigation and as fill water for Golden Gate Park lakes; and for irrigation in the Panhandle portion of the park; Lincoln Park Golf Course, and various areas of the Presidio. The treatment plant would have an annual average production capacity of up to 2 million gallons per day (mgd) and sized to meet peak-day demands of up to 5 mgd.

- Construction of a transmission pipeline primarily along 36th Avenue that would run between the proposed recycled water treatment plant at the Oceanside WPCP and the existing Central Reservoir in Golden Gate Park. The pipeline would deliver the recycled water from the Oceanside WPCP to the areas of use.

- Construction of transmission pipelines between the Central Reservoir and Lincoln Park and the Presidio and the adjacent Golden Gate Park Panhandle.

- Construction of an expanded underground reservoir to provide additional storage capacity and a new pump station to provide increased pumping capacity at the Central Reservoir site.

B. Project Objectives

The three main objectives of the SFRW Project are:

- Diversify the SFPUC's water supply by developing recycled water.
- Develop a new water supply in San Francisco that is both reliable and drought resistant.
- Reduce the use of potable water and groundwater for irrigation and other nonpotable uses by supplying those demands with recycled water.

In addition, the Project is part of the SFPUC's adopted Water System Improvement Program ("WSIP") adopted by this Commission on October 30, 2008 (see Section C.1). The WSIP consists of over 70 local and regional facility improvement projects that would increase the ability of the SFPUC's water supply system to withstand major seismic events and prolonged droughts and to meet estimated water-purchase requests in the service areas. With the exception of the water supply goal, the overall WSIP goals and objectives are based on a planning horizon through 2030. The water supply goal to meet delivery needs in the SFPUC service area is based on a planning horizon through 2018. The overall goals of the WSIP for the regional water system are to:

- Maintain high-quality water.
- Reduce vulnerability to earthquakes.
- Increase water delivery reliability.
- Meet customer water supply needs.
- Enhance sustainability.
- Achieve a cost-effective, fully operational system.

The Project would help meet WSIP level-of-service goals and system performance objectives. These goals include providing a total of 10 mgd annual average of water supply from recycled water, groundwater, and conservation projects to meet retail demand in San Francisco. Of this amount, the WSIP project description indicated that approximately 4 mgd annual average would be derived from recycled water projects in San Francisco. This Project would provide up to 2 mgd of recycled water; currently identified customers are estimated to use 1.6 mgd. This Project would also enable implementation of the SFPUC's Groundwater Supply Project, approved by the SFPUC in December, 2013. The SFPUC's Groundwater Supply Project calls for installation of new groundwater wells to recover 2.5 to 3.0 mgd of groundwater in the first phase and conversion of existing irrigation wells in Golden Gate Park to potable use, providing 1.0 to 1.5 mgd of groundwater in the second phase. The second phase cannot occur until recycled water is available for Golden Gate Park landscaping or until another landscaping water source is identified. Thus the Project would also help meet the WSIP goal of providing approximately 4 mgd annual average of water supply from groundwater.

C. Environmental Review

1. Water System Improvement Program Environmental Impact Report

On October 30, 2008, the SFPUC approved the Water System Improvement Program (also known as the "Phased WSIP") with the objective of repairing, replacing, and seismically upgrading the system's aging pipelines, tunnels, reservoirs, pump stations, and storage tanks (SFPUC, 2008; SFPUC Resolution No. 08-0200). The WSIP improvements span seven counties—Tuolumne, Stanislaus, San Joaquin, Alameda, Santa Clara, San Mateo, and San Francisco (see SFPUC Resolution No. 08-0200).

To address the potential environmental effects of the WSIP, the San Francisco Planning Department prepared a Program EIR ("PEIR"), which was certified by the San Francisco Planning Commission on October 30, 2008 (Motion No. 17734). At a project-level of detail, the PEIR evaluated the environmental impacts of the WSIP's water supply strategy and, at a program level of detail, it evaluated the environmental impacts of the WSIP's facility improvement projects. The PEIR contemplated that additional project-level environmental review would be conducted for the facility improvement projects, including the San Francisco Recycled Water Project.

2. *San Francisco Westside Recycled Water Project Environmental Impact Report*

In accordance with Sections 15063 and 15082 of the CEQA Guidelines, the Environmental Planning ("EP") staff of the San Francisco Planning Department, as lead agency, sent a first and then a revised Notice of Preparation ("NOP") to interested entities and individuals to begin the formal CEQA scoping process for the Project on June 5, 2008, and September 8, 2010, respectively. Following the 2010 NOP scoping period, the SFPUC in response to public feedback evaluated alternative possible sites, resulting in a revised Project proposal for which the Planning Department issued a revised NOP/Initial Study (IS) on July 16, 2014 with the scoping period ending on August 15, 2014. The NOP was distributed to interested parties that had received the initial NOPs, public agencies, additional interested parties and landowners/occupants located in the vicinity of the Project facilities, and was posted on the Planning Department's website and placed in the legal classified section of the San Francisco Chronicle.

The San Francisco Planning Department received nine comments on the scope of the EIR either at the scoping meeting or in writing following the 2014 scoping meeting. The comment inventories for all three NOPs are included in the Scoping Report in Appendix A of the EIR along with the IS.

EP then prepared the Draft EIR, which described the Project and the environmental setting, identified potential impacts, presented mitigation measures for impacts found to be significant or potentially significant, and evaluated Project alternatives. The Draft EIR analyzed the impacts associated with each of the key components of the Project, and identified mitigation measures applicable to reduce impacts found to be significant or potentially significant for each key component. It also included an analysis of three alternatives to the Project. In assessing

construction and operational impacts of the Project, the EIR considered the impacts of the Project as well as the cumulative impacts associated with the proposed Project in combination with other past, present, and future actions that could affect the same resources.

Each environmental issue presented in the Draft EIR was analyzed with respect to significance criteria that are based on EP guidance regarding the environmental effects to be considered significant. EP guidance is, in turn, based on CEQA Guidelines Appendix G, with some modifications.

The Draft EIR was circulated for public comment from March 18, 2015 through May 4, 2015. A public hearing on the Draft EIR to accept written or oral comments was held at the San Francisco Planning Commission meeting at San Francisco City Hall on April 23, 2015. During the public review period, EP received written comments sent through the mail, fax, or email. A court reporter was present at the public hearing, transcribed the public hearing verbatim, and prepared a written transcript.

EP then prepared the C&R document, which provided written responses to each comment received on the Draft EIR. The C&R document was published on August 19, 2015 and included copies of all of the comments received on the Draft EIR and individual responses to those comments. The C&R provided additional, updated information and clarification on issues raised by commenters, as well as SFPUC and Planning Department staff-initiated text changes to address Project updates. The Planning Commission reviewed and considered the Final EIR, which includes the Draft EIR and the C&R document, and all of the supporting information. The Final EIR provided augmented and updated information presented in the Draft EIR, on the following topics: Project description, cultural resources, transportation and circulation, air quality, hydrology and water quality, biological resources, and Project alternatives. This augmentation and update of information in the Draft EIR did not constitute new information or significance that altered any of the conclusions of the EIR.

In certifying the Final EIR, the Planning Commission determined that none of the factors are present that would necessitate recirculation of the Final EIR under CEQA Guidelines Section 15088.5. The Final EIR contains no information revealing (1) any new significant environmental impact that would result from the Project or from a new mitigation measure proposed to be implemented, (2) any substantial increase in the severity of a previously identified environmental impact, (3) any feasible Project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project, but that was rejected by the Project's proponents, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. This Commission concurs in that determination.

The Commission finds that the Project is within the scope of the Project analyzed in the Final EIR and the Final EIR fully analyzed the Project proposed for approval. No new impacts have been identified that were not analyzed in the Final EIR.

D. Approval Actions

1. San Francisco Planning Commission Actions

On August 13, 2015, the Planning Commission certified the Final EIR.

The Planning Commission also adopts CEQA Findings, makes General Plan consistency findings, and issues a Coastal Development Permit.

2. San Francisco Public Utilities Commission Actions

The SFPUC is taking the following actions and approvals to implement the Project:

- Adopts these CEQA findings and the attached Mitigation Monitoring and Reporting Program.

- Approves the Project, as described in these findings, and authorizes the General Manager or his designee to obtain necessary permits, consents, agreements and approvals as set forth in the Commission's Resolution No. 15-0187 approving the Project to which this Attachment A is attached. Approvals include entering into an agreement with the San Francisco Recreation and Parks Commission ("SFRPD") for construction in and use of SFRPD-managed land for recycled water facilities and pipelines.

3. San Francisco Recreation and Parks Commission

The Recreation and Parks Commission adopts CEQA Findings and approves an agreement with SFPUC for construction, operation and maintenance of recycled water facility structures and pipelines on park lands.

4. San Francisco Board of Supervisors Actions

The Planning Commission's certification of the Final EIR may be appealed to the Board of Supervisors. If appealed, the Board of Supervisors will determine whether to uphold the certification or to remand the Final EIR to the Planning Department for further review.

The San Francisco Board of Supervisors adopts CEQA Findings, approves an allocation of bond monies to pay for implementation of the Project, and approves the recycled water facility structures in Golden Gate Park.

5. Other – Federal, State, and Local Agencies

Implementation of the Project will involve consultation with or required approvals by other local, state, and federal regulatory agencies, including (but not limited to) the following:

- Other San Francisco City entities, including the Department of Public Works, and the San Francisco Municipal Transportation Agency

- California Army National Guard (lease amendment)

- California State Water Resources Control Board (loan approval; stormwater and recycled water discharges)

- California Department of Transportation (encroachment permit)

- California Coastal Commission (coastal permit)

- Presidio Trust (water supply agreement)

- U.S. Environmental Protection Agency and Regional Water Quality Control Board (NPDES permit)

To the extent that the identified mitigation measures require consultation or approval by these other agencies, this Commission urges these agencies to assist in implementing, coordinating, or approving the mitigation measures, as appropriate to the particular measure.

E. Contents and Location of Records

The record upon which all findings and determinations related to the Project are based ("Record of Proceedings") includes the following:

- The Draft EIR and all documents referenced in or relied upon by the EIR. (The references in these findings to the EIR or Final EIR include both the Draft EIR and the Comments and Responses document.)

- The PEIR for the Phased WSIP Variant, which is incorporated by reference in the SFRW Project EIR.

- All information (including written evidence and testimony) provided by City staff to the SFPUC and Planning Commission relating to the EIR, the Project, and the alternatives set forth in the EIR.

- All information (including written evidence and testimony) presented to the SFPUC and the Planning Commission by the environmental consultant and sub-consultants who prepared the EIR or that was incorporated into reports presented to the SFPUC.

- All information presented at any public hearing or workshop related to the Project and the EIR.

- The Mitigation Monitoring and Reporting Program.

- All other documents available to the SFPUC and the public, comprising the administrative record pursuant to Public Resources Code Section 21167.6(e).

The SFPUC has relied on all of the information listed above in reaching its decision on the Project, even if not every document was formally presented to the SFPUC. Without exception, these documents fall into one of two categories. Many documents reflect prior planning or legislative decisions that the SFPUC was aware of in approving the Project. Other documents influenced the expert advice provided to Planning Department staff or consultants, who then provided advice to the SFPUC. For these reasons, such documents form part of the underlying factual basis for the SFPUC's decisions relating to the adoption of the Project.

The public hearing transcript, a copy of all letters regarding the Draft EIR received during the public review period, the administrative record, and background documentation for the Final EIR are available at the San Francisco Planning Department, 1650 Mission Street, San Francisco. **Jonas P. Ionin**, Commission Secretary, is the Custodian of Records for the Planning Department Materials concerning approval of the Project and adoption of these findings are contained in SFPUC files, SFPUC Project No. CUW30102 in the Bureau of Environmental Management, San Francisco Public Utilities Commission, 525 Golden Gate Avenue, San Francisco, California 94102. The Custodian of Records is **Scott MacPherson.** All files have been available to the SFPUC and the public for review in considering these findings and whether to approve the Project.

F. Findings about Significant Environmental Impacts and Mitigation Measures

The following Sections II, III, and IV set forth the SFPUC's findings about the Final EIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the SFPUC regarding the environmental impacts of the Project and the mitigation measures included as part of the Final EIR and adopted by the SFPUC as part of the Project. To avoid duplication and redundancy, and because the SFPUC agrees with, and hereby adopts, the conclusions in the Final EIR, these findings will not repeat the analysis and conclusions in the Final EIR but instead incorporate them by reference and rely upon them as substantial evidence supporting these findings.

In making these findings, the SFPUC has considered the opinions of SFPUC staff and experts, other agencies, and members of the public. The SFPUC finds that (i) the determination of significance thresholds is a judgment decision within the discretion of the City and County of San Francisco; (ii) the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and (iii) the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the SFPUC is not bound by the significance determinations in the EIR (see Public Resources Code, Section 21082.2, subdivision (e)), the SFPUC finds them persuasive and hereby adopts them as its own.

These findings do not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the Final EIR, and these findings hereby incorporate by reference the

discussion and analysis in the Final EIR supporting the determination regarding the project impact and mitigation measures designed to address those impacts. In making these findings, the SFPUC ratifies, adopts and incorporates in these findings the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the SFPUC adopts and incorporates all of the mitigation measures set forth in the Final EIR and the attached MMRP to substantially lessen or avoid the potentially significant and significant impacts of the Project. The SFPUC intends to adopt each of the mitigation measures proposed in the Final EIR. Accordingly, in the event a mitigation measure recommended in the Final EIR has inadvertently been omitted in these findings or the MMRP, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measures in the Final EIR due to a clerical error, the language of the policies and implementation measures as set forth in the Final EIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the Final EIR.

In Sections II, III and IV below, the same findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding dozens of times to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the SFPUC rejecting the conclusions of the Final EIR or the mitigation measures recommended in the Final EIR for the Project.

II. Impacts Found Not To Be Significant and Thus Do Not Require Mitigation

Under CEQA, no mitigation measures are required for impacts that are less than significant (Public Resources Code, Section 21002; CEQA Guidelines, Sections 15126.4, subdivision (a)(3), 15091). Based on the evidence in the whole record of this proceeding, the SFPUC finds that the implementation of the Project either does not apply or will result in no impacts in the following areas: (1) Population and Housing: displace existing housing units or people or require new housing; (2) Transportation and Circulation: change air traffic patterns; (3) Noise: expose people to airplane noise or be substantially affected by existing noise levels; (4) Air Quality: create objectionable odors; (5) Recreation: create a need for new facilities; (6) Utilities and Service Systems: conflict with solid waste regulations; (7) Public Services: create a need for new or altered facilities; (8) Biological Resources: conflict with local policies protecting biological resources, such as trees, or a habitat conservation plan or other similar plan; (9) Geology and Soils: change existing topography or unique geologic features of the site; (10) Hydrology and Water Quality: expose housing to flooding hazard, impede or redirect flood flows, or expose people or structures to harm from flooding, seiche, tsunami or mudflow; (11) Hazardous Materials: create a safety hazard from aircraft or fires; (12) Mineral and Energy Resources: result in loss of mineral resource or availability of a resource recovery site; and (13) Agricultural Resources: all issues. These subjects are not further discussed in these findings.

The SFPUC further finds that implementation of the Project will not result in any significant impacts in the following areas and that these impact areas therefore do not require mitigation:

Land Use

- **Impact LU-1:** The Project would not physically divide an established community.
- **Impact LU-2:** The Project would not conflict with any applicable land use plans, policies, or regulations of any agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.
- **Impact LU-3:** The Project would not impact the existing character of the vicinity.
- **Impact C-LU:** The Project would not have a cumulative impact on land use.

Aesthetics

- **Impact AE-1**: The Project would not have an adverse effect on a scenic vista, scenic resource, or the existing visual character or quality of the site and its surroundings.
- **Impact AE-2:** The Project would not result in a substantial source of light or glare.
- **Impact C-AE:** The Project would not have a cumulative impact on aesthetics.

Population and Housing

- **Impact PH-1:** The Project would not induce substantial population growth, either directly or indirectly.
- **Impact C-PH:** The Project would not have a project-specific impact on population and housing and, therefore, would not directly result in a significant cumulative impact on population and housing.

Cultural Resources

- **Impact CP-1:** The Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code.

Transportation and Circulation

- **Impact TR-1:** The Project would not result in conflict with an applicable congestion management program.
- **Impact TR-2:** Closure of travel lanes during Project construction would temporarily reduce roadway capacity and increase traffic delays on area roadways, causing

temporary and intermittent conflicts with all modes of travel, but the effects would be of short duration and limited in magnitude.

- **Impact TR-3:** Project construction would cause temporary increases in traffic volumes on area roadways, but would not cause substantial conflicts with the performance of the circulation system.

- **Impact TR-4:** Project construction within roadways would not substantially limit access to adjacent roadways and land uses.

- **Impact TR-5:** Project construction would not substantially impair access to alternative transportation facilities (public transit, bicycle, or pedestrian facilities), although it could temporarily deteriorate the performance of such facilities.

- **Impact TR-6:** Project operation and maintenance activities would cause some increases in traffic volumes on area roadways, but would not substantially alter transportation conditions and would not cause conflicts with alternative travel modes, including vehicles, emergency vehicles, transit, pedestrians, and bicycle traffic.

- **Impact C-TR:** The Project, in combination with past, present, and reasonably foreseeable future projects, would not substantially contribute to cumulative traffic increases on local and regional roads.

Noise and Vibration

- **Impact NO-1:** The Project would not result in substantial groundborne vibration or groundborne noise levels.

- **Impact NO-2:** Project operations would not result in the exposure of persons to, or generation of, noise levels in excess of standards or a substantial increase in ambient noise levels in the Project vicinity.

- **Impact NO-3:** Construction of the Project would not result in a substantial temporary increase in ambient noise levels at the closest residential receptors, and would not expose persons to substantial noise levels in excess of standards established in the Noise Ordinance (Article 29 of the Police Code).

- **Impact C-NO:** The Project would not have significant cumulative noise impacts.

Air Quality

- **Impact AQ-1:** The Project would not create objectionable odors that would affect a substantial number of people.

- **Impact AQ-3:** The Project's construction activities would generate TACs, including DPM, but would not expose sensitive receptors to substantial pollutant concentrations.

- **Impact C-AQ:** The Project could result in cumulative air quality impacts associated with criteria pollutant and precursor emissions and health risks, but the Project's contribution would not be cumulatively considerable.

Greenhouse Gas Emissions

- **Impact C-GG-1**: The Project would generate greenhouse gas emissions during Project construction and operation, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.

Wind and Shadow

- **Impact WS-1:** The Project would not alter wind in a manner that substantially affects public areas.

- **Impact WS-2:** The Project would not create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas.

- **Impact C-WS:** The Project would not have significant cumulative wind and shadow impacts.

Recreation

- **Impact RE-1:** The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities.

- **Impact C-RE:** The Project would not have a significant cumulative impact on recreation.

Utilities and Service Systems

- **Impact UT-1:** The Project would not result in construction or expansion of water or wastewater treatment facilities, exceed wastewater treatment requirements, or stormwater drainage facilities, exceed wastewater requirements, or result in a determination by the wastewater treatment provider that there is insufficient capacity to serve the Project.

- **Impact UT-2:** The Project would have sufficient water supply available, and would not require new or expanded water supply resources or entitlements.

- **Impact UT-3:** The Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.

- **Impact UT-4:** The Project would comply with all applicable statutes and regulations related to solid waste.

- **Impact UT-5:** The Project's construction would not result in a substantial adverse effect related to disruption, relocation, or accidental damage to existing utilities.

- **Impact C-UT:** The Project would not have a significant cumulative impact on utilities and service systems.

Biological Resources

- **Impact BI-2:** The Project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

- **Impact BI-3:** The Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act.

- **Impact BI-4:** The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Geology and Soils

- **Impact GE-1:** The Project would not expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, or seismically induced ground failure.

- **Impact GE-2:** The Project would not result in substantial soil erosion or the loss of topsoil.

- **Impact GE-3:** The Project is not located on a geologic unit or soil that is unstable, or that could become unstable as a result of the Project.

- **Impact C-GE:** The Project would not have a significant cumulative impact related to geologic hazards.

Hydrology and Water Quality

- **Impact HY-1:** Project construction would not violate any water quality standards or waste discharge requirements or otherwise degrade water quality.

- **Impact HY-2:** Project operation would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, provide substantial an additional sources of polluted runoff, or, with the exception of potentially violating water quality standards, otherwise substantially degrade water quality.

- **Impact HY-3:** The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

- **Impact HY-4:** The Project would not alter the existing drainage pattern of the area in a manner that would result in substantial erosion, siltation, or flooding on or off the site.

- **Impact C-HY-1:** The Project would not have a significant cumulative hydrology and water quality impact.

Hazards and Hazardous Materials

- **Impact HZ-1:** Project construction would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- **Impact HZ-2:** The Project would be constructed on a site identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 but excavation activities would not expose workers and the public to adverse effects from release of hazardous materials.

- **Impact HZ-3:** Reconfiguration of the chemical building interior would not expose workers and the public to hazardous building materials including asbestos-containing materials, lead-based paint, PCBs, bis(2-ethylhexyl) phthalate (DEHP), and mercury, or result in a release of these materials into the environment during construction.

- **Impact HZ-4:** The Project would not result in adverse effects related to hazardous emissions or handling of acutely hazardous materials within ¼ mile of an existing school.

- **Impact HZ-5:** The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- **Impact C-HZ-1:** The Project would not have a significant cumulative impact related to hazardous materials.

Mineral and Energy Resources

- **Impact ME-1:** The Project would not encourage activities that result in the use of large amounts of fuel, water, or energy, or use of these resources in a wasteful manner.

- **Impact C-ME:** The Project would not have significant cumulative mineral and energy impacts.

III. Findings of Potentially Significant or Significant Impacts That Can Be Avoided or Reduced to a Less-Than-Significant Level through Mitigation and the Disposition of the Mitigation Measures

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potentially significant impacts if such measures are feasible (unless mitigation to such levels is achieved through adoption of a project alternative). The findings in this Section III and in Section IV concern mitigation measures set forth in the EIR. These findings discuss mitigation measures as proposed in the EIR and recommended for adoption by the SFPUC, which can be implemented by the SFPUC. The mitigation measures proposed for adoption in this section and referenced following each Project impact discussed in this Section III, are the same as the mitigation measures identified in the Final EIR for the Project. The full text of each mitigation measure listed in this section is contained in the Final EIR and in Attachment B, the MMRP. The Commission finds that for the reasons set forth in the Final EIR and elsewhere in the record, the impacts identified in this section would be reduced to a less-than-significant level through implementation of the mitigation measures identified in this section.

Project Impacts

Cultural Resources

Impact CP-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Less than Significant with Mitigation)

Based on the results of the background research, geoarchaeological assessment, and survey results, there is generally, throughout the CEQA Area of Potential Effect, a low potential for uncovering archaeological resources during Project construction. However, it is possible that previously unrecorded and buried (or otherwise obscured) archaeological deposits could be discovered during Project construction. Excavation, grading, and the movement of heavy construction vehicles and equipment could expose and cause impacts on unknown archaeological resources, which would be a *significant* impact. The impact would be reduced to a less-than-significant level through mitigation measure M-CP-2, which requires avoidance measures or appropriate treatment of cultural resources if accidentally discovered.

- *Mitigation Measure M-CP-2, Accidental Discovery of Archaeological Resources*

Impact CP-3: The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)

Ground-disturbing activities associated with the construction of the recycled water treatment plant would extend about 23 feet into the Colma Formation, a geologic unit with a high paleontological sensitivity. Vertebrate fossils, including parts of mammoths and bison, have been found in the Colma Formation in San Francisco. Given the sensitivity of the Colma Formation and the depth of excavation, the Project could adversely impact paleontological resources at the water treatment plant site, a *significant* impact. The impact would be reduced to a less-than-significant level through mitigation measure M-CP-3, which requires the contractor to stop all ground disturbance within 50 feet if a paleontological resource is encountered and to implement actions to investigate the discovery and recover fossil remains by a qualified professional before ground-disturbing activities can resume.

- *Mitigation Measure M-CP-3, Accidental Discovery of Paleontological Resources*

Impact CP-4: The proposed Project could accidentally disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)

Based on the background research, geological assessment, and survey results, there is a low potential for Project construction to uncover human remains, except for the Project area adjacent to the Golden Gate Cemetery (see Impact CP-5). Although no known human burials have been identified within the Project site, the possibility of encountering human remains cannot be entirely discounted. Earthmoving activities associated with Project construction could result in direct impacts on previously undiscovered human remains. Therefore, the disturbance to human remains could be a *significant* impact. The impact would be reduced to a less-than-significant level through mitigation measure M-CP-4, which requires avoidance measures or the appropriate treatment of human remains if accidentally discovered.

- *Mitigation Measure M-CP-4, Accidental Discovery of Human Remains*

Impact CP-5: Construction of the Project along Clement Street from 36th Avenue to 39th Avenue on the south side of Lincoln Park could disturb human remains associated with the historic-period Golden Gate Cemetery. (Less than Significant with Mitigation)

The Project borders the boundary of Lincoln Park, the location of the historic-period Golden Gate Cemetery where 19th century inhabitants of San Francisco were buried. Past projects in the area have uncovered human remains, which have provided a wealth of information about the overall health of these former inhabitants. While there is a slight potential for the Project to uncover human remains, the disturbance of remains would be a *significant* impact. The impact would be reduced to a less-than-significant level with the implementation of mitigation measure M-CP-5, which requires the development of a monitoring program to monitor for the presence of human remains in the historic-period during construction and to take specific steps to comply with legal requirements and to take mitigation actions to recover historically important data.

- *Mitigation Measure M-CP-5, Archeological Monitoring Program*

Air Quality

Impact AQ-2: The Project's construction activities would generate fugitive dust and criteria air pollutants, and could violate an air quality standard or contribute substantially to an existing or projected air quality violation. (Less than Significant with Mitigation)

When the construction schedules of components of the Project overlap, NOx emissions could exceed the BAAQMD's 54 pounds/day significance criterion, a *significant* impact. Mitigation measure M-AQ-2 would reduce the Project's combined construction-related criteria pollutant emissions below the significance criteria by using construction equipment with Tier 3 engines or better, reducing the impact to less than significant.

- *Mitigation Measure M-AQ-2, Construction Emissions Minimization*

Biological Resources

Impact BI-1: The Project would potentially have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (Less than Significant with Mitigation)

The overall potential of the Project area to support special-status fish or plant species is considered low because the Project area lacks suitable habitat. Several special-status animals might use habitat in certain parts of the Project area or vicinity for roosting, foraging, or breeding purposes, including California red-legged frog, western pond turtle, Yuma myotis, western red bat, and hoary bat. In addition, there are a number of native resident and migratory bird species protected under federal and State legislation with the potential to use trees, shrubs, and other habitats as well as buildings within the Project area for nesting and foraging.

Existing trees at the Oceanside WPCP facility and the California Army National Guard property, and in the vicinity of the Central Pump Station, could support native nesting birds. Removal and/or relocation of trees with active nests and construction noise and activity adjacent to such trees during bird nesting season could result in nest abandonment, destruction, injury or mortality of nestlings and disruption of reproductive behavior during the breeding season, including mortality of individual birds, such as red-shouldered hawk, red-tailed hawk, Cooper's hawk, or American kestrel, a *significant* impact. Implementation of mitigation measure M-BI-1a would reduce potential impacts on special-status birds to a less-than-significant level by requiring surveys of the Project site to identify nests and protection of nesting birds.

Vegetation clearing (including tree removal) at the Oceanside WPCP and the Central Pump Station could result in direct mortality of special-status bats. Direct mortality of special-status bats would be a *significant* impact. Mitigation measure BI-1b would require surveys of the

Project site within two weeks of tree removal. With implementation of M-BI-1b, the impact on roosting bats would be reduced to less than significant.

Due to the proximity of aquatic habitats to the Lake Merced, North Lake, and Central Pump Station well facility sites, western pond turtle and California red-legged frog could utilize upland habitat where the Project construction activities will occur. If California red-legged frog or western pond turtle are present, they could be injured or killed, a *significant* impact. Mitigation measure M-BI-1c would mitigate the effect by requiring pre-construction surveys within 14 days of the construction activity. With implementation of mitigation measure M-BI-1c, the impact would be less than significant.

- *Mitigation Measure M-BI-1a, Nesting Bird Protection Measures*
- *Mitigation Measure M-BI-1b, Avoidance and Minimization Measures for Special-Status Bats*
- *Mitigation Measure M-BI-1c, Avoidance and Minimization Measures for California Red-Legged Frog and Western Pond Turtle*

Cumulative Impacts

Cultural Resources

Impact C-CP: The Project could result in cumulatively considerable impacts related to historical, archaeological, paleontological resources or human remains. (Less than Significant with Mitigation)

Cumulative projects in the Project vicinity could adversely affect the same cultural resources affected by the Project and the Project could make a considerable contribution to a cumulative cultural resource impact, a *significant* impact. The Project's impacts, however, are site specific and implementation of site-specific mitigation measures M-CP-2, M-CP-3, M-CP-4 and M-CP-5 would reduce Project impacts such that the Project's contribution to this cumulative impact would be less than significant.

- *Mitigation Measure M-CP-2, Accidental Discovery of Archaeological Resources*
- *Mitigation Measure M-CP-3, Accidental Discovery of Paleontological Resources*
- *Mitigation Measure M-CP-4, Accidental Discovery of Human Remain*
- *Mitigation Measure M-CP-5, Archeological Monitoring Program*

Biological Resources

Impact C-BI-1: The Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, could result in significant cumulative impacts on biological resources. (Less than Significant with Mitigation)

Construction of the Project has the potential to adversely affect special-status species, if present, including California red-legged frog, western pond turtle, special-status bats, and native nesting birds. It is assumed that the cumulative projects including the past cumulative projects have already caused substantial adverse cumulative changes to biological resources in San Francisco; the Project area was converted from its original sand dune habitat to current uses. Current and reasonably foreseeable projects could have construction-related impacts if construction occurs at the same time as the Project. These projects include the Vista Grande Drainage Basin Improvement Plan, the Parkmerced Project, and the San Francisco Groundwater Supply Project. The Project's contribution to cumulative impacts on biological resources would be cumulatively considerable, a *significant* impact. However, with the implementation of Project-level mitigation measures to reduce impacts to these species, the Project's incremental contribution to potential cumulative impacts on biological resources would not be cumulatively considerable (less than significant).

- *Mitigation Measure M-BI-1a, Nesting Bird Protection Measures*
- *Mitigation Measure M-BI-1b, Avoidance and Minimization Measures for Special-Status Bats*
- *Mitigation Measure M-BI-1c, Avoidance and Minimization Measures for California Red-Legged Frog and Western Pond Turtle*

IV. Significant Impacts That Cannot Be Avoided or Reduced to a Less-Than-Significant Level

WSIP Impact

Based on substantial evidence in the whole record of these proceedings, the SFPUC finds that, where feasible, changes or alterations have been required or incorporated into the SFRW Project to reduce the significant environmental impacts as identified in the Final EIR for the Project. All Project-specific impacts will be reduced to a less-than-significant level with the implementation of the mitigation measures proposed in the Final EIR and set forth in the MMRP, attached hereto as Attachment B.

The SFPUC further finds, however, that the Project is a component of the WSIP and, therefore, will contribute to the significant and unavoidable impact caused by the WSIP water supply decision. For the WSIP impact listed below, the effect remains significant and unavoidable. The SFPUC determines that the following significant impact on the environment, as reflected in the Final PEIR, is unavoidable, but under Public Resources Code Section 21081(a) (3) and (b), and CEQA Guidelines Sections 15091(a) (3), 15092(b) (2) (B), and 15093, the SFPUC determines that the impact is acceptable due to the overriding considerations described in Section VI below. This finding is supported by substantial evidence in the record of this proceeding.

The WSIP PEIR and this Commission's Resolution No. 08-0200 related to the WSIP water supply decision identified three significant and unavoidable impacts of the WSIP: ***Impact 5.4.1-2-***

Stream Flow: Effects on flow along Alameda Creek below the Alameda Creek Division Dam; ***Impact 5.5.5-1****-Fisheries: Effects on fishery resources in Crystal Springs reservoir (Upper and Lower);* and ***Impact 7-1****-Indirect growth inducing impacts in the SFPUC service area.* Mitigation measures that were proposed in the PEIR were adopted by this Commission for these impacts; however, the mitigation measures could not reduce all the impacts to a less than significant level, and these impacts were determined to be significant and unavoidable. This Commission has already adopted the mitigation measures proposed in the PEIR to reduce these impacts when it approved the WSIP in its Resolution No. 08-0200. This Commission also adopted a Mitigation Monitoring and Reporting Program as part of that approval. The findings regarding the three impacts and mitigation measures for these impacts set forth in Resolution No. 08-0200 are incorporated into these findings by this reference, as though fully set forth in these CEQA Findings.

Subsequent to the certification of the PEIR, the Planning Department has conducted more detailed, site-specific review of two of the significant and unavoidable water supply impacts identified in the PEIR. In the case of ***Impact 5.5.5.-1***, the Project-level fisheries analysis in the Lower Crystal Springs Dam Improvement Project Final EIR modifies the PEIR impact determination based on more detailed site-specific data and analysis and determined that impacts on fishery resources due to inundation effects would be less than significant. Project-level conclusions supersede any contrary impact conclusions in the PEIR. The SFPUC adopted CEQA Findings with respect to the approval of the Lower Crystal Springs Dam Improvement Project in Resolution No. 10-0175. The CEQA Findings in Resolution No. 10-0175 related to the impacts on fishery resources due to inundation effects are incorporated into these findings by this reference, as though fully set forth in these CEQA Findings.

In the case of ***Impact 5.4.1-2***, the project level analysis in the Calaveras Dam Replacement project Final EIR modifies the PEIR determination and concludes that the impact related to stream flow along Alameda Creek between the diversion dam and the confluence with Calaveras Creek (PEIR Impact 5.4.1-2) will be less than significant based on more detailed, site-specific modeling and data. Project-level conclusions supersede any contrary impact conclusions in the PEIR. The SFPUC adopted CEQA Findings with respect to the approval of the Calaveras Dam Improvement Project in Resolution No. 11-0015. The CEQA Findings in Resolution No. 11-0015 related to the impacts on fishery resources due to inundation effects are incorporated into these findings by this reference, as though fully set forth in these CEQA Findings.

The remaining significant and unavoidable water supply impact listed in Resolution No. 08-0200 is as follows, relating to ***Impact 7-1***:

Potentially Significant and Unavoidable WSIP Water Supply and System Operation Impact

- **Growth**: Indirect growth-inducement impacts in the SFPUC service area.

V. Evaluation of Project Alternatives

This section describes the Project as well as alternatives and the reasons for approving the Project and for rejecting the alternatives as infeasible. CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet Project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project.

A. Reasons for Approval of the Project

The overall goals of the WSIP for the regional water system are to:

- Maintain high-quality water and a gravity-driven system.
- Reduce vulnerability to earthquakes – deliver basic service to the three regions in the service area within 24 hours and restore facilities to meet average-day demand within 30 days after a major earthquake.
- Increase delivery reliability – allow planned maintenance shutdown without customer service interruption and minimize risk of service interruption from unplanned outages.
- Meet customer water supply needs through 2018 – meet average annual water purchase requests during non-drought years and meet dry-year delivery needs while limiting rationing to a maximum 20 percent systemwide; diversify water supply options during non-drought and drought years and improve use of new water resources, including the use of groundwater, recycled water, conservation and transfers.
- Enhance sustainability.
- Achieve a cost-effective, fully operational system.

The Project would help meet WSIP level-of-service goals and system performance objectives. Specific objectives of the Project are to:

- Diversify the SFPUC's water supplies by developing recycled water.
- Develop a new water supply in San Francisco that is both reliable and drought resistant.
- Reduce the use of potable water and groundwater for irrigation and other nonpotable uses by supplying those demands with recycled water.

The WSIP aims to provide a total of 10 mgd annual average of water supply from recycled water, groundwater, and conservation projects to meet retail demand in San Francisco. Of this amount,

the WSIP project description indicated that approximately 4 mgd annual average would be derived from recycled water projects in San Francisco. This Project would provide up to 2 mgd of recycled water; currently identified customers are estimated to use 1.6 mgd. Also, this Project would enable implementation of the SFPUC's Groundwater Supply Project, approved by the SFPUC in December, 2013. The SFPUC's Groundwater Supply Project calls for installation of new groundwater wells to recover 2.5 to 3.0 mgd of groundwater in the first phase and conversion of existing irrigation wells in Golden Gate Park to potable use, providing 1.0 to 1.5 mgd of groundwater in the second phase. The second phase cannot occur until recycled water is available for Golden Gate Park landscaping or until another landscaping water source is identified. Thus the Project would also help meet the WSIP goal of providing approximately 4 mgd annual average of water supply from groundwater.

This increase in water supply would improve the SFPUC's ability to deliver water to its customers in San Francisco during both drought and non-drought periods. The Project will help the SFPUC to diversify its water supply portfolio, which largely consists of imported surface water. It would add up to 2 mgd from recycled water to the SFPUC water supply, and enable implementation of the second phase the SFPUC's Groundwater Supply Project, which would provide 1.0 to 1.5 mgd of groundwater to the SFPUC's potable water supply. The proposed Project is a fundamental component of the SFPUC's WSIP and is needed to fully meet WSIP goals and objectives, in particular those for seismic reliability, delivery reliability, and water supply reliability.

B. Alternatives Rejected and Reasons for Rejection

The Commission rejects the alternatives set forth in the Final EIR and listed below because the Commission finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described in this section in addition to those described in Section VI below under CEQA Guidelines 15091(a)(3), that make such Alternatives infeasible. In making these infeasibility determinations, the Commission is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." The Commission is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project, and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Alternative A: No Project

Under the No Project Alternative, the SFRW Project would not be constructed or operated. The proposed recycled water treatment, storage, and distribution facilities would not be constructed and 1.6 mgd of recycled water would not be produced or delivered to customers to offset potable demand. Existing irrigation demand at Golden Gate Park, Lincoln Park, and the Presidio, as well as lake refill would continue to be met with existing potable sources and groundwater. The two existing irrigation wells in Golden Gate Park that are part of the second phase of the SFPUC's

Groundwater Supply Project would not be converted to potable groundwater well facilities unless and until another source of water for irrigation and lake fill can be found.

The No Project Alternative would not meet any of the project objectives, which are to diversify the SFPUC's water supplies by developing recycled water, develop a new water supply in San Francisco that is both reliable and drought resistant, and reduce the use of potable water and groundwater for irrigation and other nonpotable uses by supplying those demands with recycled water. Also, it would fail to meet the WSIP goals and objectives that rely directly on the contribution of the Project to fulfill systemwide level of service objectives. If the Project is not constructed, the SFPUC's water supply portfolio would not include up to 2 mgd of recycled water. It would also prevent the SFPUC from implementing the second phase of SFPUC's Groundwater Supply Project, which would produce 1.0 to 1.5 mgd of groundwater. This phase of the project cannot be implemented until another source of water besides groundwater is provided to Golden Gate Park for irrigation and lake refill. The SFPUC would be limited in its ability to meet its adopted WSIP seismic delivery and water supply reliability goals, particularly in the San Francisco region, because of reduced water supply in San Francisco.

Under the No Project Alternative, current conditions would continue and all construction-related impacts would be avoided. Consequently, there would be no potential to encounter previously unrecorded and buried archaeological deposits, archeological resources, human remains, or legally-significant prehistoric depositions within the Colma Formation at the Oceanside WPCP. No construction activities means that fugitive dust and criteria pollutant emissions would not occur and there would be no construction-related effects or disturbance to special-status species, including the California red-legged frog, western pond turtle, nesting birds and roosting bats. While the No Project Alternative would avoid or reduce impacts that would occur compared to those of the Project, the Project impacts would be fully mitigated through the adoption of identified mitigation measures. The only unmitigated impact that would occur with the Project is the Project's contribution to the WSIP impact of indirect impacts related to growth. To the extent that the 2 mgd of water supply from the Project contributes to growth, the Project's contribution to the indirect impacts associated with growth would not occur with the No Project Alternative.

The Commission rejects the No Project Alternative as infeasible because it would not meet any of the project objectives, and because it would jeopardize the SFPUC's ability to meet the adopted WSIP goals and objectives as set forth in SFPUC Resolution No. 08-0200.

Alternative B: Project Design Alternative

Alternative B: Project Design Alternative, would locate the recycled water treatment plant at the San Francisco Zoo overflow parking lot, a 2.3 acre site north of the Oceanside WPCP and east of the Great Highway. Under the Project as proposed, the site would be used for construction staging. Storage and pumping facilities that under the Project would be located at the Central Reservoir site in Golden Gate Park would instead be located with the recycled water treatment plant at the San Francisco Zoo overflow parking lot. Under this Alternative, distribution pipelines would avoid Route 35/Skyline Boulevard and streets adjacent to Sunset Boulevard and instead, distribution pipelines would run from the San Francisco Zoo overflow parking lot north to

Wawona Street, then east to 34th Street, and north up 34th Street into Golden Gate Park. Construction activities would be sequenced and staggered, reducing the amount of concurrent construction and extending the overall Project construction duration. Staging would not occur at Harding Road and Herbst Road. Other aspects of the Project would remain unchanged and the Project would be able to produce the same 5 mgd peak flow amount, or 2 mgd annual average amount of recycled water.

This Alternative reduces impacts on cultural resources in several ways. As a result of decreasing the area of construction activities slightly by consolidating the treatment and storage facilities to one area at the San Francisco Zoo overflow parking lot instead of at the Oceanside WPCP and Central Reservoir sites, the impacts on unknown archaeological resources and human remains would be reduced. This Alternative would eliminate the potential impacts to paleontological resources because it would avoid construction in the Colma Formation below the Oceanside WPCP site. As a result of reducing impacts on cultural resources, the Alternative would make less of a contribution to cumulative impacts on cultural resources.

The daily impact on air quality would be less under Alternative B than the Project. By construction sequencing and staggering construction activities, Alternative B would reduce the amount of fugitive dust and criteria pollutants emitted at one time, thereby reducing the potential to exceed regulatory thresholds based on emissions per day. However, the total amount of construction would not be reduced and the total amount of air pollution would be the same as for the Project.

Alternative B would reduce impacts on biological resources. Fewer impacts could occur to nesting birds because trees would not need to be removed between the Oceanside WPCP and the California National Guard property. Also, vegetation clearing at the Central Reservoir site would be avoided as would disturbance of trees on Route 35/Skyline Boulevard and Sunset Avenue. Pipeline construction that would instead occur on Wawona Street and 34th Avenue would disturb few trees. Alternative B also would reduce impacts on roosting bats by reducing construction near trees in the vicinity of the Oceanside WPCP, Lake Merced, and the Central Pump Station site where bats are thought most likely to roost. Finally, the elimination of construction near Lake Merced, along Route 35/Skyline Boulevard, and near Harding and Herbst Roads, and elimination of most construction around the Central Reservoir site, would reduce impacts on the Western Pond turtle and California red-legged frog, which may be found in upland habitat in these areas. The only remaining areas where these species may be found, at Metson and Lloyd Lakes in Golden Gate Park would have minimal construction nearby, limited to installation of pipeline distribution lines. As a result of reduced impacts on biological resources under Alternative B, the contribution to cumulative impacts to biological resources also would be reduced as compared to the Project.

This Alternative also would increase certain impacts as compared to the Project and result in different impacts than the Project in the areas of noise, traffic, and energy use. Alternative B would increase construction and operational noise levels in the vicinity of the San Francisco Zoo by moving the construction activities and facilities approximately 900 feet closer to Zoo facilities

as compared to the Project. Increased noise could negatively impact Zoo animals. Operational noise impacts might be reduced through noise reduction berms.

Shifting the location of construction of the recycled water treatment plant could increase truck traffic along the Great Highway and potentially require lane detours. Also, relocating distribution pipelines from Route 35/Skyline Boulevard and Sunset Avenue to Wawona Street and 34th Avenue would cause an increase in traffic on narrower roadways, possibly increasing traffic impacts.

Finally, locating the recycled water storage reservoir at the Zoo parking lot instead of at the Central Reservoir site would require additional energy to pump recycled water over longer distances and elevations to customers north of the Central Reservoir site. Under the Project, four 100 horsepower pumps (one standby) would be installed at the Central Reservoir site in a new pump station to pump recycled water from the Central Reservoir to users in Golden Gate Park and north. There also would be three pumps with motors of up to 200 horsepower to pump recycled water from the treatment facility to the Central Reservoir site. Under Alternative B, a new pump station would be installed instead at the Zoo parking lot site, with three or more up to 400 horsepower pumps installed to pump recycled water to all the planned distribution points. By comparison, Alternative B would require more energy to distribute the recycled water to the same planned distribution points.

The Project Design Alternative would meet all of the Project objectives and WSIP goals and objectives, although completion of the Project would be delayed due to a longer construction schedule. It is also possible that future treatment plant operations would be restricted because of proximity to the Zoo facilities and concern by the Zoo of disruption to Zoo activities and disturbance of animals.

The SFPUC rejects the Project Design Alternative as infeasible. While the Project Design Alternative would reduce some impacts to cultural resources, biological resources, and air quality, all of the Project impacts that it would reduce will be reduced to less than significant levels under the Project with the implementation of adopted mitigation measures. The Project Design Alternative will increase other impacts in the areas of noise and traffic. It is possible that such effects, if significant, could be mitigated but may affect Project operations. Alternative B also would increase energy use by requiring the pumping of recycled water over a longer distances and elevations than under the Project, resulting in energy waste. Thus, the Project Design Alternative does not have a clear environmental benefit over the Project as the Project would mitigate its impacts and it is unclear whether the increased impacts of the Project Design Alternative can be fully mitigated.

Most problematic from a feasibility perspective is the fact that the SFPUC does not have control over the proposed site for the co-located recycled water treatment plant, pump station, and water storage facilities at the San Francisco Zoo overflow parking lot. The parking lot is under the management of the San Francisco Recreation and Parks Department with the premises leased to the nonprofit San Francisco Zoological Society. The SFPUC would need the consent of the San Francisco Zoo and the San Francisco Recreation and Parks Departments to obtain use of the site.

The SFPUC has been informed that the Zoo has plans to use the site for necessary Zoo operations, including meeting stringent animal isolation and testing requirements. The San Francisco Zoo and the Recreation and Parks Departments are therefore, unlikely to readily agree to the SFPUC taking over use of the site.

Under the circumstances, the SFPUC finds that the Project Design Alternative is not feasible as the site is currently and in the future projected to be needed by the San Francisco Zoo for its own operations. In addition, even if the San Francisco Zoo and the Recreation and Parks Departments might eventually agree to the SFPUC's use of the site, the SFPUC is faced with an unpredictable period of delay in implementing the Project. Finally, the Project Design Alternative would result in minimal to no benefit to the environment. All Project impacts, with the exception of the WSIP-related impact to growth are mitigable. On the other hand, the Project Design Alternative would cause energy waste and it would have the same WSIP-related impact to growth. For all of these reasons, the SFPUC rejects the Project Design Alternative as infeasible.

Alternative C: Reduced Project Alternative

The Reduced Project Alternative would eliminate recycled water supply to Lincoln Park and the Presidio. Under the Reduced Project Alternative, a new underground storage reservoir and pump station would not be constructed at the Central Reservoir site and distribution pipelines north of the Central Reservoir would be eliminated. The size of the recycled water treatment plant and storage at the Oceanside WPCP would be reduced somewhat and the construction duration would be shorter. As a result of these changes from the Project, the recycled water treatment plant would have a reduced peak-day capacity of 3.8 mgd instead of 5 mgd and an annual average capacity of 1.7 mgd instead of 2.0 mgd.

This Alternative reduces impacts on cultural resources in several ways. First, as a result of eliminating recycled water supply to Lincoln Park, significant potential impacts on human remains that may be associated with the former Golden Gate Cemetery site (e.g. Lincoln Park) would be avoided. Second, construction of a smaller recycled water supply treatment plant, eliminating new storage and pumping facilities at the Central Reservoir site, and eliminating distribution pipelines north of the Central Reservoir reduces the area of excavation, reducing potential exposure to unknown archeological resources and unknown human remains. Third, constructing a smaller recycled water treatment plant reduces potential impacts to paleontological resources that may be found in the Colma Formation as less excavation in that area would be required. Finally, by reducing cultural resource impacts, the contribution to cumulative impacts on cultural resources also would be reduced.

Alternative C would not reduce the daily impact on air quality, but because total construction activities are reduced, the total volume of air pollution emitted during construction is less under Alternative C than the Project.

Alternative C would reduce impacts on biological resources. Fewer impacts could occur to nesting birds, California red-legged frog and western pond turtle as a result of reduced construction activities at the Central Reservoir site where these species could be impacted. As a

result of reduced impacts on biological resources under Alternative C, this alternative would make less of a contribution to cumulative impacts to biological resources as compared to the Project.

Alternative C also would reduce energy usage as compared to the Project because it would eliminate the need to pump recycled water to Lincoln Park and the Presidio from the Central Reservoir site. Alternative C would also reduce the contribution to the WSIP's indirect growth inducing impact by reducing the amount of water that could be supplied to a growing population.

Alternative C: Reduced Project Alternative would meet the Project objectives, which are to diversify the SFPUC's water supplies by developing recycled water, develop a new water supply in San Francisco that is both reliable and drought resistant, and reduce the use of potable water and groundwater for irrigation and other nonpotable uses by supplying those demands with recycled water. However, by reducing the capacity of the recycled water treatment plant, Alternative C would not provide the full amount of recycled water supply provided under the Project so the degree to which it would meet the last of these objectives would be reduced somewhat. Alternative C would enable implementation of the SFPUC's Groundwater Supply Project, approved by the SFPUC in December, 2013, because it would provide recycled water to Golden Gate Park, facilitating the implementation of the second phase of the SFPUC's Groundwater Supply Project, which calls for conversion of existing irrigation wells in Golden Gate Park to potable use, providing 1.0 to 1.5 mgd of groundwater.

However, Alternative C would only partially meet the WSIP goals and objectives that rely directly on the contribution of the Project to fulfill systemwide level of service objectives. The WSIP aims to provide a total of 10 mgd annual average of water supply from recycled water, groundwater, and conservation projects to meet retail demand in San Francisco. Of this amount, the WSIP project description indicated that approximately 4 mgd annual average would be derived from recycled water projects in San Francisco. The Project would provide up to 2 mgd of recycled water on an annual average basis, and 5 mgd peak day flow, but under Alternative C this would be reduced to 1.7 mgd annual average and 3.8 mgd peak day flow. Under the project, currently identified customers have a demand of 1.6 mgd annual average and 4 mgd peak-day, but customer served would be reduced to those with a demand of 1.38 mgd annual average and 2.81 mgd peak day. Customers at Lincoln Park and the Presidio that could use recycled water would continue to use potable water sources for irrigation.

To the extent that Alternative C fails to fully satisfy WSIP identified water supply goals and objectives as approved under SFPUC Resolution 08-0200, it would limit the SFPUC's ability to provide water to customers during both drought and non-drought periods and may prevent the SFPUC from limiting rationing during drought periods to a maximum 20 percent systemwide. Customers in San Francisco would be most affected as water supply in the city would be reduced during peak demand periods by up to 1.2 mgd. As a result, the SFPUC may need to revise the WSIP goals and objectives or develop additional water supply projects.

Environmentally Superior Alternative. The Reduced Project Alternative would be the Environmentally Superior Alternative, other than the No Project Alternative. The Reduced

Project Alternative would not increase any impacts and it would reduce impacts on cultural resources and biological resources. Also, it would reduce energy use and reduce the total amount of air pollution produced by the Project.

The Reduced Project Alternative would still contribute to the WSIP's significant and unavoidable indirect impact related to growth, but to a lesser degree than for the Project, as it would provide 0.3 mgd less of water supply on an annual average basis that could contribute to growth.

The Commission rejects the Reduced Project Alternative as infeasible because it will not allow the SFPUC to fully meet WSIP goals and objectives. Additionally, although this alternative would generally meet the SFPUC's objectives for the Project, it would not satisfy the Project's third objective to the same degree as the Project, namely to reduce the use of potable water and groundwater for irrigation and other nonpotable uses by supplying those demands with recycled water. Likewise, it would only partially meet the WSIP goals and objectives, which rely directly on the up to 2 mgd of local recycled water supply on the west side of San Francisco that the Project would provide to fulfill systemwide level of service objectives. The total average yield under normal operations for the Reduced Project Alternative would be 1.7 mgd, causing the SFPUC to fall short of the 2 mgd annual water supply designed for the Project and the WSIP identified supply need of 4 mgd from local recycled water supply by 2018. Although the SFPUC originally envisioned that the 4 mgd of recycled water would supply customers on the west side of San Francisco and now the SFPUC expects the west side recycled water demand to be somewhat reduced, the SFPUC has not revised its originally WSIP goal of obtaining 4 mgd from recycled water and is exploring recycled water supply options on the east side of the City. Thus, if the Project were sized below the Project size of 2 mgd annual average, and designed not to serve Lincoln Park and the Presidio, some viable recycled water supply customers on the west side of San Francisco would not be able to make use of recycled water and instead would need to continue to use groundwater or imported surface water for irrigation and other nonpotable uses. Such a situation would be contrary to the WSIP goal of diversifying water supply options and improving use of new water resources, such as recycled water. For these reasons, the SFPUC rejects the Reduced Yield Alternative as infeasible.

VI. Statement of Overriding Considerations

Pursuant to CEQA Section 21081 and CEQA Guidelines Section 15093, the Commission hereby finds, after consideration of the Final EIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below, independently and collectively outweighs the significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Commission will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Record of Proceedings, as defined in Section I.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the Commission specifically finds that there are significant benefits of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations. The Commission further finds that, as part of the process of obtaining Project approval, all significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. All mitigation measures proposed in the Final EIR for the Project are adopted as part of this approval action. Furthermore, the Commission has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technical, legal, social, and other considerations.

The Project will have the following benefits:

- The Project will expand and diversify the SFPUC's water supply portfolio to increase system reliability, particularly for retail customers in San Francisco. The Project provides an additional 2 mgd of water supply from other than imported surface water, the main water supply source in the SFPUC water system.

- The Project will increase the use of local water supply sources. The Project provides 2 mgd of recycled water to irrigators on the Westside of San Francisco who are now using imported potable surface water or groundwater for irrigation.

- The Project will reduce dependence on imported surface water. The Project provides 2 mgd from local recycled water.

- The Project, by providing recycled water for irrigation and lake refill in Golden Gate Park will enable the implementation of the second phase of the SFPUC's San Francisco Groundwater Supply Project, which will provide 1.0 to 1.3 mgd of potable groundwater supply.

In addition, the Project will further the WSIP's goals and objectives. As part of the approval of Resolution 08-2000, the SFPUC adopted a Statement of Overriding Considerations as to why the benefits of the WSIP outweighed the significant and unavoidable impacts associated with the WSIP. This Statement of Overriding Considerations is relevant to the significant and unavoidable impact related to growth-inducement to which this Project contributes. The findings regarding the Statement of Overriding Considerations set forth in Resolution No. 08-2000 are incorporated into these findings by this reference, as though fully set forth in these CEQA Findings. In addition, for the particular reasons set forth below, this Project helps to implement the following benefits of the WSIP:

- Implementation of the WSIP will reduce vulnerability to earthquakes. The WSIP includes many features that are designed to improve the seismic safety and reliability of the water system as a means of saving human life and property under a catastrophic earthquake scenario or even a disaster scenario not rising to the level of catastrophe. Effecting the improvements to assure the water system's continued reliability, and developing it as part of a

larger, integrated water security strategy, is critical to the Bay Area's economic security, competitiveness and quality of life. This Project provides a critical source of water – local recycled water – that will be available even if it is not possible for a period of time to obtain imported surface water from the SFPUC's regional water system.

- The WSIP would meet SFPUC customer water supply needs by providing 265 mgd of retail and wholesale customer purchases from the SFPUC watersheds, and meet or offset the remaining 20 mgd through conservation, recycled water, and groundwater in the retail and wholesale service areas. Ten mgd of this would be met, as proposed under the WSIP, through conservation, recycled water, and groundwater projects in San Francisco, and 10 mgd would be met through local conservation, recycled water and groundwater in the wholesale service area. Of the 10 mgd that would come from projects in San Francisco, the WSIP identifies 4 mgd from local recycled water. This Project would provide up to 2 mgd of this critical 4 mgd of local recycled water. In addition, by providing recycled water to Golden Gate Park, this Project will enable implementation of the second phase of the SFPUC's San Francisco Groundwater Supply Project, which will provide 1.0 to 1.3 mgd of potable groundwater for San Francisco residents, water that is currently used for irrigation and lake refill in Golden Gate Park.

- The WSIP will substantially improve use of new water sources and drought management, including use of groundwater, recycled water, conservation, and transfers. A critical part of the WSIP is to provide water from new sources other than from imported surface water from the Hetch Hetchy Valley or watersheds in Alameda County and the Peninsula. This Project is important to meeting the WSIP goal of providing local recycled water in San Francisco.

- The WSIP projects are designed to meet applicable federal and state water quality requirements. This Project, which will produce recycled water by treating sanitary sewage with microfiltration/ultrafiltration, reverse osmosis, and ultraviolet light disinfection, will provide recycled water that meets or exceeds the California Department of Public Health requirements for disinfected tertiary recycled water.

- The WSIP will diversify water supply options during non-drought and drought periods. The Project supports this WSIP objective by providing up to 2 mgd of local recycled water during both drought and non-drought periods.

Having considered these benefits, including the benefits discussed in Section I above, the Commission finds that the benefits of the Project and the Project's furtherance of the WSIP goals and objectives outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects are therefore acceptable.

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources						
CP-2	The proposed project could cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5(f).	**Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources.** The following measures shall be implemented should construction activities result in the accidental discovery of an archeological resource: The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Sections 15064.5(a) and (c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet. Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken. If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall evaluate the discovered material and advise the ERO as to whether the discovery historical or unique retains sufficient integrity and is of potential scientific/historical/cultural significance. If a significant archeological resource is present, the archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor including avoidance measures or other appropriate mitigation. Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing/data recovery program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the EP division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions. The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological testing/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.	1) SFPUC EMB 2) SFPUC CMB 3) SFPUC CMB/BEM (Archeologist) 4) SFPUC CMB/BEM (Archeologist)	1) SFPUC BEM 2) SFPUC BEM 3) SFPUC BEM and ERO 4) SFPUC BEM and ERO	1) Ensure that measures related to archaeological discovers are included in contract documents. 2) Ensure that all personnel attend environmental training prior to beginning work, receive "ALERT" sheet, and sign the training sign-in sheets. Maintain file of signature sheets for submittal to ERO. Monitor to ensure that the contractors implement measures in contract document, report non-compliance and ensure corrective action. 3) Evaluate the potential discovery and advise the ERO as to the significance of the discovery. If warranted, proceed with measures that may include the following: a. On-site preservation of resource; b. Archaeological monitoring program with prior review/approval of ERO; or c. Archaeological testing/data recovery program with prior review/approval of ERO. 4) Prepare a Final Archaeological Resources Report. Submit to ERO for review and approval. Submit to others as required once approved by ERO.	1) Design 2) Preconstruction and Construction 3) Construction 4) Post Construction

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources (cont.)						
CP-2 (cont.)		Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey NWIC shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable copy on compact disk (CD) three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.				
CP-3	The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**Mitigation Measure M-CP-3: Accidental Discovery of Paleontological Resources.** The following measures shall be implemented should construction at the recycled water treatment plant site result in the accidental discovery of paleontological resources: To reduce the potential for the proposed project to result in a significant impact on paleontological resources, the SFPUC shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the project site and how to identify such resources. The training could consist of a recorded presentation of the initial training that could be reused for new personnel. The training shall also include a review of penalties for looting and disturbance of these resources. An alert sheet shall be prepared by the qualified paleontologist and shall include the following: 1. A discussion of the potential to encounter paleontological resources. 2. Instructions for reporting observed looting of a paleontological resource; and instructions that if a paleontological deposit is encountered within a project area, all soil-disturbing activities in the vicinity of the deposit shall cease and the Environmental Review Officer (ERO) shall be notified immediately. 3. Who to contact in the event of an unanticipated discovery. If potential fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until the qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with SVP 1995 guidelines and currently accepted scientific practice, and shall be subject to review and approval by the ERO or designee. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report for publication describing the finds. The SFPUC shall be responsible for ensuring that treatment is implemented and reported to the San Francisco Planning Department. If no report is required, the SFPUC shall nonetheless ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.	1) SFPUC EMB 2) SFPUC CMB/BEM (Paleontologist) 3) SFPUC CMB/BEM	1) SFPUC BEM 2) SFPUC BEM and ERO 3) SFPUC BEM and ERO	1) Ensure that contract documents include the listed measures related to paleontological resources. 2) Obtain and review résumé or other documentation on paleontologist's qualifications. Ensure that contractor's staff participate in the environmental training prior to beginning work and sign the training sign-in sheet. Maintain file of sign-in sheets. 3) In the event of a discovery, confirm suspension of work, examine fossil, and advise the EOR to the significance of the discovery. Earthwork and ground disturbance in the vicinity of find shall stop until qualified paleontologist can assess nature/importance of find and make a recommendation regarding further action. 4) Monitor to ensure that the contractor implements measures in contract documents including insuring that all potential discoveries are reported as required and that contractor suspends work in the vicinity. Report noncompliance and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources (cont.)						
CP-4	The proposed project could accidentally disturb unknown human remains, including those interred outside of formal cemeteries.	**Mitigation Measure M-CP-4: Accidental Discovery of Unknown Human Remains.** The following measures shall be implemented should construction activities, all of which are outside a dedicated cemetery, result in the accidental discovery of previously unknown human remains and associated cultural materials: The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activities shall comply with applicable state laws. This shall include immediate notification of the coroner of the county within which the project is located for (i) a determination that no investigation of the cause of death is required; and (ii) in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The archaeological consultant, SFPUC, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 24 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the SFPUC shall follow Section 5097.98(b) of the PRC, which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."	1) SFPUC EMB 2) SFPUC CMB/BEM (Archeologist) 3) SFPUC CMB/BEM	1) SFPUC BEM 2) SFPUC BEM 3) SFPUC BEM and ERO	1) Ensure that contract documents include measures related to discovery of human remains. 2) If potential human remains or funerary objects are encountered, mobilize an archeologist to confirm existence of human remains. If human remains are confirmed, perform required coordination and notifications. 3) Monitor to ensure that the contractor implements measures in contract documents including insuring that all potential human remains are reported as required and that contractor suspends work in the vicinity. Report noncompliance and ensure corrective action.	1) Design 2) Construction 3) Construction
CP-5	Construction of the proposed project along Clement Street from 36th Avenue to 39th Avenue on the south side of Lincoln Park could disturb human remains associated with the historic-period Golden Gate Cemetery.	**Mitigation Measure M-CP-5: Archeological Monitoring Program.** Based on the potential that human remains associated with the historic-period Golden Gate Cemetery may be present (buried) within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on the human remains if exposed during construction. The project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall undertake an archeological monitoring program (AMP) as specified herein. In addition, the consultant shall be available to conduct an archeological data recovery program (ADRP) if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c). ***Archeological Monitoring Program.*** The archeological consultant shall prepare and submit to the ERO for review and approval an AMP for the ground disturbing activities associated with construction of distribution pipelines along Clement Street from 36th Avenue to 39th Avenue on the south side of Lincoln Park and a connection point to	1) SFPUC CMB/BEM (Archeologist) 2) SFPUC BEM (Archeologist) 3) SFPUC CMB/BEM 4) SFPUC BEM (Archeologist)	1) SFPUC BEM and ERO 2) SFPUC BEM and ERO 3) SFPUC BEMand ERO 4) SFPUC BEM and ERO	1) Prepare and implement an Archeological Monitoring Program in consultation with ERO. Submit AMP to the ERO for review and approval. If human remains are encountered, perform required coordination and notifications. Document activities in monitoring logs. 2) If required by the ERO, prepare Archeological Data Recovery Plan and submit for review and approval to ERO. 3) Monitor to ensure that contractor implements applicable measures in contract documents. Report noncompliance, and ensure corrective action. 4) Prepare Final Archeological Resources Report (FARR) to document historical significance of any discovered archeological resource and submit to ERO..	1) Preconstruction/ Construction 2) Preconstruction/ Construction 3) Construction 4) Post-construction

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources (cont.)						
CP-5 (cont.)		the Lincoln Park Pump Station. The AMP shall be conducted in accordance with the approved AMP. The AMP shall minimally include the following provisions: • The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored and the frequency. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential human remains and to their depositional context; • The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of human remains; • The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on human remains; • The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; • If human remains are encountered, all soils-disturbing activities in the vicinity of the find shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the find is evaluated. The archeological consultant shall immediately notify the ERO of the encountered human remains. If human remains are encountered, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the SFPUC immediately notifies the San Francisco County coroner for (i) a determination that no investigation of the cause of death is required; and (ii) a determination whether the human remains are Native American. If the human remains are not Native American, and if the coroner determines the remains are not subject to his or her authority, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing and/or an ADRP. If the ERO determines that the human remains could be adversely affected by the proposed project, at the discretion of the project sponsor either: A) The proposed project shall be re-designed so as to avoid any adverse effect on the human remains; or B) A data recovery program shall be implemented, unless the ERO determines that the find is of greater interpretive than research significance and that interpretive use of the find is feasible. ***Archeological Data Recovery Program.*** If required by the ERO, the archeological data recovery program shall be conducted in accord with an ADRP. The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP				

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources (cont.)						
CP-5 (cont.)		prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical. The scope of the ADRP shall include the following elements: • *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations. • *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures. • *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies. • *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the ADRP. • *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities • *Final Report.* Description of proposed report format and distribution of results. • *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. ***Final Archeological Resources Report.*** The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey NWIC shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (California Department of Parks and Recreation 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.				

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

SAN FRANCISCO WESTSIDE RECYCLED WATER PROJECT (SF Environmental Planning Case No. 2008.00912E) – MITIGATION MONITORING AND REPORTING PROGRAM (Continued)

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Cultural and Paleontological Resources (cont.)						
C-CP	The proposed project could result in cumulatively considerable impacts related to historical, archaeological, or paleontological resources or human remains.	Implement Mitigation Measures M-CP-2 (Accidental Discovery of Archeological Resources), M-CP-3 (Accidental Discovery of Paleontological Resources), M-CP-4 (Accidental Discovery of Unknown Human Remains), and M-CP-5 (Archeological Monitoring Program).	See respective mitigation measures			
Air Quality						
AQ-2	The proposed project's construction activities would generate fugitive dust and criteria air pollutants, and could violate an air quality standard or contribute substantially to an existing or projected air quality violation.	**Mitigation Measure M-AQ-2: Construction Emissions Minimization.** A. **Additional Exhaust Control Measures.** In addition to complying with the Clean Construction Ordinance requirements (use of biodiesel fuel grade B20 or higher, and either meets or exceeds Tier 2 engines or operate with the most effective VDECS for off-road equipment), average construction-related NOx emissions from all overlapping project components shall not exceed 54 pounds per day. The construction contract specifications shall require the contractor to submit a comprehensive inventory of all off-road construction equipment greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities. The inventory shall include each vehicle's license plate number, horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall demonstrate, through the use of Tier 3 engines (or engines retrofitted with CARB Level 3 Verified Diesel Emissions Control Strategy), that the combined average emissions from all overlapping project components shall not exceed 54 pounds per day. The contractor shall update the inventory and submit it monthly to the SFPUC throughout the duration of the project.	1) SFPUC EMB 2) SFPUC CMB/BEM	1) SFPUC BEM 2) SFPUC BEM/	1) Ensure all appropriate language incorporated into contract documents 2) Monitor to ensure that contractor implements measures in contract documents including the update and monthly submittal of comprehensive inventories to the SFPUC throughout the duration of the project.	1) Design 2) Construction
Biological Resources						
BI-1	The project would potentially have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	**Mitigation Measure M-BI-1a: Nesting Bird Protection Measures.** Nesting birds and their nests shall be protected during construction by use of the following: • Conducting vegetation and tree removal and construction activities outside the bird nesting season (February 1 to August 30), to the extent feasible. • If construction occurs during the bird nesting season, a qualified wildlife biologist would conduct preconstruction surveys within seven days of the start of construction or after any construction breaks of 14 days or more to identify active nests. A nest is defined to be active for raptors if there is a pair of raptors displaying reproductive behavior (i.e., courting) at the nest and/or if the nest contains eggs or chicks. Surveys shall be performed for the project site and suitable habitat within 250 feet of the project site in order to locate any active passerine nests and within 500 feet of the project site to the extent access is granted by other property owners to locate any active raptor (birds of prey) nests or double-crested cormorant or heron rookeries. • If active nests are located during the preconstruction bird nesting survey, the wildlife biologist shall evaluate if the schedule of construction activities could affect the active nest and the following measures shall be implemented based on their determination: 1. If construction is not likely to affect the active nest, it may proceed without restriction; however, a biologist shall regularly monitor the nest to confirm there is no adverse effect and may revise their determination at any time during the nesting season. In this case, the following measure would apply.	1) SFPUC EMB 2) SFPUC CMB/BEM (Qualified Biologist) 3) SFPUC CMB	1) SFPUC BEM 2) SFPUC BEM 3) SFPUC BEM	1) Ensure that requirements related to nesting bird protection are included in contract documents. 2) Obtain and review resume or other documentation of consulting biologist's qualifications. Conduct surveys as required. If active nests are located during survey, establish buffer zones, consulting with USFWS/CDFW as necessary, and monitor regularly. Document monitoring activities in logs. 3) Monitor to ensure that contractor(s) implements measures in contract documents. Report noncompliance, and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Biological Resources (cont.)						
BI-1 (cont.)		2. If construction may affect the active nest, the biologist shall establish a no disturbance buffer. The biologist shall determine the appropriate buffer taking into account the species involved, the presence of any obstruction, such as a building, is within line-of-sight between the nest and construction, and the level of project and ambient activity (i.e. adjacent to a road or active trail). No disturbance buffers for passerines typically vary from 25 feet and greater and for raptors from 300 feet and greater. For bird species that are federally and/or state-listed sensitive species (i.e., threatened, endangered, fully protected, species of special concern), an SFPUC representative, supported by the wildlife biologist, shall consult with the USFWS and/or CDFW regarding nest buffers. Removing inactive passerine nests may occur at any time. Inactive raptor nests shall not be removed unless approved by the USFWS and/or CDFW. Removing or relocating active nests shall be coordinated by the SFPUC representative with the USFWS/and or CDFW, as appropriate, given the nests that are found on the site. • Any birds that begin nesting within the project area and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels and no work exclusion zones shall be established around active nests in these cases.				
		Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Special-Status Bats. In coordination with the SFPUC, a qualified wildlife biologist shall conduct preconstruction special-status bat surveys before trees and structures that are suitable for bat roosting (i.e., excluding temporary trailers, retaining walls, etc.) are removed. If active day or night roosts are found, the wildlife biologist shall take actions to make such roosts unsuitable habitat before trees and structures are removed. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. Bat roosts that begin during construction are presumed to be unaffected, and no buffer would be necessary.	1) SFPUC EMB 2) SFPUC CMB/BEM (Qualified Biologist) 3) SFPUC CMB/BEM	1) SFPUC BEM 2) SFPUC BEM 3) SFPUC BEM	1) Ensure that contract documents include applicable avoidance and minimization measures. 2) Obtain and review resume or other documentation of consulting biologist's qualifications. Conduct pre-construction survey. If roosts are found, implement appropriate measures. Document activities in monitoring logs. 3) Monitor to ensure that contractor(s) implement measures in contract documents. Report noncompliance, and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction
		Mitigation Measure M-BI-1c: Avoidance and Minimization Measures for California Red-Legged Frog and Western Pond Turtle. During construction on Route 35/Skyline Boulevard, at the Central Pump Station site, on the pipeline route within Golden Park near aquatic habitat, and during use of the Harding Road and Herbst Road staging areas, the SFPUC shall ensure a biological monitor is present during installation of exclusion fencing and initial vegetation clearing and/or grading, and shall implement the following measures: • Within one week before work at these sites begins (including demolition and vegetation removal), a qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, as deemed necessary by the biologist, to prevent California red-legged frogs and western pond turtles from entering the work area. The construction contractor shall install suitable fencing with a minimum height of 3 feet above ground surface with an additional 4-6 inches of fence material buried for unpaved surfaces and sand-bagged at the lower edge where needed for paved surfaces such that species cannot crawl under the fence.	1) SFPUC EMB 2) SFPUC CMB/BEM (Biologist) 3) SFPUC CMB/BEM (Biologist) 4) SFPUC CMB/BEM	1) SFPUC BEM 2) SFPUC BEM 3) SFPUC BEM 4) SFPUC BEM	1) Ensure that contract documents include applicable avoidance and minimization measures for California red-legged frog, western pond turtles, including requirement for exclusion fencings. 2) Develop worker training program and ensure that all construction personnel participate in the environmental training prior to beginning work at the job site(s). Require workers to sign the training program sign-in sheet. Maintain file of training sign-in sheets. 3) Obtain and review résumé or other documentation of consulting biologist's qualifications. Conduct preconstruction surveys, species relocation (if it is not possible for the species to move out of the project area out of its own volition, and, in the case of an identified red-legged frog(s), approved by the USFWS and/or	1) Design 2) Preconstruction and Construction 3) Preconstruction and Construction 4) Construction

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service

Impact No.	Impact Summary	Adopted Mitigation Measures	Monitoring and Reporting Program			
			Responsible Party	Reviewing and Approval Party	Monitoring and Reporting Actions	Implementation Schedule
Biological Resources (cont.)						
BI-1 (cont.)		• A qualified biologist shall conduct environmental awareness training in person or via video for all construction workers prior to construction workers beginning their work efforts on the project. The training shall include information on species identification, avoidance measures to be implemented by the project, and the regulatory requirements and penalties for noncompliance. If necessary, the content shall vary according to specific construction areas (e.g., workers on city streets will receive training on nesting birds but not on California red-legged frog identification). • A qualified biologist shall survey the project area within 48 hours before the onset of initial ground-disturbing activities and shall be present during initial vegetation clearing and ground-disturbing activities. The biological monitor shall monitor the exclusion fencing weekly to confirm proper maintenance and inspect for frogs and turtles. If California red-legged frogs or western pond turtles are found, the SFPUC shall halt construction in the vicinity that poses a threat to the individual as determined by the qualified biologist. If possible, the individual shall be allowed to move out of the project area of its own volition (i.e., if it is near the exclusion fence that can be temporarily removed to let it pass). For western pond turtles, a qualified biologist shall relocate turtles to the nearest suitable habitat. For California red-legged frog, a SFPUC representative shall contact the USFWS and/or CDFW for instructions on how to proceed. Construction shall resume after the individual is out of harm's way. During project activities, excavations deeper than 6 inches shall be covered overnight or an escape ramp of earth or a wooden plank at a 3:1 rise shall be installed; openings such as pipes where California red legged frogs or western pond turtles might seek refuge shall be covered when not in use, and all trash that may attract predators or hide California red-legged frogs or western pond turtles shall be properly contained on a daily basis, removed from the worksite, and disposed of regularly. Following construction, the construction contractor shall remove all trash and construction debris from work areas.			CDFW) and monitoring, including weekly fence inspection. Document activities in monitoring logs. 4) Monitor to ensure that contractor(s) implements measures in contract documents. Report noncompliance, and ensure corrective action.	
C-BI-1	The project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, could result in significant cumulative impacts on biological resources.	Implement Mitigation Measures M-BI-1a (Nesting Bird Protection Measures), M-BI-1b (Avoidance and Minimization Measures for Special-Status Bats), and M-BI-1c (Avoidance and Minimization Measures for California Red-Legged Frog and Western Pond Turtle).	*See respective mitigation measures*			

BEM = (SFPUC) Bureau of Environmental Management
CDFW = California Department of Fish and Wildlife
CMB = (SFPUC) Construction Management Bureau
EMB = (SFPUC) Engineering Management Bureau
ERO = SF Planning Department Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
USFWS = United States Fish and Wildlife Service