

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: September 23, 2026

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Consideration of a request by the San Francisco Public Utilities Commission, pursuant to Government Code Section 65402, that the County determine whether the Sunset Supply Pipeline Erosion Repair Project conforms to the County General Plan.

County File Number: GPC2026-00007 (San Francisco Public Utilities Commission)

PROPOSAL

Consideration of a request by the City and County of San Francisco, through the San Francisco Public Utilities Commission (SFPUC), under California Government Code Section 65402(b), that the County determine that Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek conforms to the County General Plan.

RECOMMENDATION

That the Planning Commission find that the SFPUC Sunset Supply Pipeline Erosion Repair Project (APN 093-131-010) conforms to the County General Plan.

BACKGROUND

Report Prepared By: Bharat Singh Planning Services Manager

Applicant: SFPUC

Owner: SFPUC

Public Notification: Ten (10) day advanced notification for the hearing was mailed to property owners within 300 feet of the project parcel and a notice for the hearing posted in the San Mateo County Times for general public circulation.

Location: 1551 Crystal Springs Road, San Mateo, CA 94402

APN(s): 093-131-010

Size: 5.41 Acres

Existing Zoning: Resource Management District

General Plan Designation: Open Space

Local Coastal Plan Designation: N/A

Sphere-of-Influence: N/A

Williamson Act: N/A

Existing Land Use: Open Space, Existing water transmission pipeline, part of the SFPUC's regional water supply system

Flood Zone: Zone X - Area of Undetermined Flood Hazard

Environmental Evaluation: A report that the project conforms to the County General Plan is exempt from environmental review because the County's ministerial functions performed under Government Code Section 65402 are not an approval of a project within the meaning of the California Environmental Quality Act (CEQA). The San Francisco Planning Department determined that the project required an Addendum to the Crystal Springs Pipeline No. 2 Replacement Project Final Environmental Impact Report under the California Environmental Quality Act (Case No. 2005-0963ENV-05). The addendum is available at:

<https://sfpuc.sharefile.com/public/share/web-sc78eec44705f4a0b9a60db31bd350dde>

Setting: The project site is on the west side of Crystal Spring Road on SFPUC land near the Tartan Trail Road intersection.

DISCUSSION

A. KEY ISSUES

1. Project Description

The project would maintain the integrity and reliability of the existing SFPUC regional water transmission infrastructure by constructing erosion repairs and bank stabilization along an approximately 400-foot-long reach of the Sunset Supply Pipeline at two segments of the pipeline that have been eroded by San Mateo Creek. The project is within the SFPUC's fee-owned property (APNs 093-131-010 in unincorporated County and 093-132-010 in the Town of Hillsborough).

The project would prevent further erosion, stabilize the creek bank, and protect the pipeline, while retaining the general configuration of the creek channel. Specific project elements would include construction of the following:

- Two concrete walls placed between the creek and the pipeline, one at each of the two erosion sites where the pipeline is exposed.
- Bioengineered creek embankments and placement of woody materials along the creek side of the walls.
- Improvements to the existing SFPUC access road along the pipeline in the vicinity of the repairs

Construction would occur over approximately 4 to 6 months in the dry summer season of 2027, from May/June to September/October. Construction activities would entail the following activities: site preparation including vegetation removal and installation of a cofferdam to bypass creek flows; construction of the concrete walls and placement of engineered backfill behind the walls; installation of bioengineered creek embankments with riprap placed at each end of the walls; access road improvements; and site restoration.

2. Analysis

Because the subject property already has a pipeline (constructed in 2013), and the CEQA reevaluation of environmental effects indicates that all potential impacts can be reduced to a less-than-significant level through the implementation of refined project-specific mitigation measures and SFPUC Standard Construction Measures, the proposed project is consistent with the General Plan's Vegetative, Fish and Wildlife Resources policies, Soil Resources policies, Mineral Resources policies, Visual Quality policies, Water Supply policies, Wastewater policies, Transportation policies, Solid Waste policies, Natural Hazards policies, Man-Made Hazards policies, or Climate Element policies.

The subject property is in the designated urban area of the County and does not implicate the General Plan's Rural Land Use policies.

The subject property contains no identified historic or archaeological resources and does not implicate the General Plan's Historical and Archaeological policies.

The proposed project is repairing an existing water pipeline. The project potentially implicates General Plan Urban Land Use Policy 8.36, Uses, which encourages the County to allow uses in zoning districts that are

consistent with the overall land use designation. As the proposed project does not change the existing intensity of use or use of the property in a Resource Management (RM) district, the project is consistent with this policy.

B. ALTERNATIVES

The alternative to a finding of conformity with the General Plan is for the Planning Commission to find that the proposed project does not conform to the policies of the County General Plan. Another alternative is to take no action. Failure to make a report within 40 days from submittal will be deemed a finding that the project as described in the submittal is in conformity with the adopted General Plan.

C. ENVIRONMENTAL REVIEW

A report that the proposed improvement of property conforms to the County General Plan is exempt from environmental review because the County's ministerial functions performed under Government Code Section 65402 are not an approval of a project within the meaning of the California Environmental Quality Act. The City and County of San Francisco, as lead agency, determined after a reevaluation of the project's environmental effects indicates that all potential impacts can be reduced to a less-than-significant level through the implementation of refined project-specific mitigation measures and SFPUC Standard Construction Measures.

D. REVIEWING AGENCIES

County Attorney's Office

ATTACHMENTS

- A. Recommended Findings
- B. Location and Site Map
- C. Application Letter
- D. Addendum 2 to the Environmental Impact Report



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT A

County of San Mateo
Planning and Building Department

RECOMMENDED FINDING

Permit or Project File Number: GPC2026-00007 Hearing Date: September 23, 2026

Prepared By: Bharat Singh For Adoption By: Planning Commission
Planning Services Manager

RECOMMENDED FINDING

That the Planning Commission find that the SFPUC Sunset Supply Pipeline Erosion Repair Project (APN 093-131-010) conforms to the County General Plan.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT B



0.60 0 0.30 0.60 Miles

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1: 19,163



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT C



August 6, 2026

Steve Monowitz
San Mateo County Planning Services Director
San Mateo County
455 County Center, 2nd Floor
Redwood City, CA 94063

Via Email and Certified US Mail – Return Receipt Requested

Re: Request for General Plan Conformity Determination for the
Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek

Dear Mr. Monowitz,

The City and County of San Francisco, through the San Francisco Public Utilities Commission (SFPUC), submits this letter seeking a general plan conformity determination under California Government Code Section 65402(b) from the San Mateo County Planning Department for the SFPUC's Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek (project).

The project would maintain the integrity and reliability of the existing SFPUC regional water transmission infrastructure by constructing erosion repairs and bank stabilization along an approximately 400-foot-long reach of the Sunset Supply Pipeline at two segments of the pipeline that have been eroded by San Mateo Creek. The project is within the SFPUC's fee-owned property (Assessor Parcel Numbers 093-131-010 and 093-132-010) in the Town of Hillsborough.

The project would prevent further erosion, stabilize the creek bank, protect the pipeline, while retaining the general configuration of the creek channel. Specific project elements would include construction of the following:

- Two concrete walls placed between the creek and the pipeline, one at each of the two erosion sites where the pipeline is exposed
- Bioengineered creek embankments and placement of woody materials along the creek side of the walls

Daniel Lurie
Mayor

Joshua Arce
President

Stephen E. Leveroni
Vice President

Avni Jamdar
Commissioner

Kate H. Stacy
Commissioner

Meghan Thurlow
Commissioner

Dennis J. Herrera
General Manager

Services of the San Francisco Public Utilities Commission

OUR MISSION: To provide our customers with high-quality, efficient, and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



- Improvements to the existing SFPUC access road along the pipeline in the vicinity of the repairs

Construction would occur over approximately 4 to 6 months in the dry summer season of 2027, from May/June to September/October. Construction activities would entail the following activities: site preparation including vegetation removal and installation of a cofferdam to bypass creek flows; construction of the concrete walls and placement of engineered backfill behind the walls; installation of bioengineered creek embankments with riprap placed at each end of the walls; access road improvements; and site restoration.

Government Code Section 65402(b) requires that, prior to constructing a public building or structure in another city or county, the SFPUC must request review of the project's conformity with the County's adopted general plan. If the County does not respond within 40 days of this request, the project is deemed to be in conformity with the general plan.

Please note that although Section 65402(b) provides for the above review, under the doctrine of intergovernmental immunity, the SFPUC is exempt from a requirement to conform to zoning ordinances, building codes, and the general plans of other cities and counties when the SFPUC performs work on property outside of San Francisco, regardless of whether the SFPUC owns the property, or when SFPUC leases or acquires property for public purposes in other cities and counties.¹

The San Francisco Planning Department determined that the project required an Addendum to the Crystal Springs Pipeline No. 2 Replacement Project Final Environmental Impact Report under the California Environmental Quality Act (Case No. 2005-0963ENV-05). The addendum is available at: <https://sfpuc.sharefile.com/public/share/web-sc78eec44705f4a0b9a60db31bd350dde>

This letter is provided to satisfy the noticing requirements of Government Code Section 65402(b) and does not necessarily require any action or reply on the part of the County. If you wish to respond, please contact me at aylam@sfgwater.org or (415) 934-3907. Thank you in advance for your attention to this matter.

¹ See *Lawler v. City of Redding* (1992) 7 Cal. App. 4th 778, 782-783 (Government Code Sections 53090 and 53091 prevail over the provision of Section 65402(b)), and an early case involving Sonoma County and the City of Santa Rosa, *Akins v. County of Sonoma* (1967), 67 Cal. 2d 185, 194.

Sincerely,

Anna Lam

Anna Lam
Project Manager, SFPUC Project Management Bureau

Attachment: Project Vicinity Map

Cc: Hannah Young, Environmental Project Manager, SFPUC Environmental
Management

Attachment: Project Vicinity Map





COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT D



ADDENDUM 2 TO ENVIRONMENTAL IMPACT REPORT

<i>Date of Publication of Addendum:</i>	July 29, 2029
<i>Date of EIR Certification:</i>	September 30, 2010
<i>EIR Case No.</i>	2005.0963E
<i>Project Title:</i>	Crystal Springs Pipeline No. 2 Replacement Project
<i>SCH No.</i>	2008112050
<i>Project Modification:</i>	Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek
<i>Modified Project Case No.</i>	2005.0963ENV-05
<i>Project Sponsor:</i>	San Francisco Public Utilities Commission Hannah Young, (415) 551-4558, hmyoung@sfgwater.org
<i>Lead Agency:</i>	San Francisco Planning Department Julie Moore, (628) 652-7566, julie.moore@sfgov.org

1. Background

On September 30, 2010, the San Francisco Planning Commission certified the Crystal Springs Pipeline No. 2 (CSPL2) Replacement Project Final Environmental Impact Report (FEIR),¹ and on October 15, 2010, the San Francisco Public Utilities Commission (SFPUC) approved the project. The approved project² included pipeline rehabilitation and improvement activities for CSPL2, an approximately 19-mile-long water transmission pipeline with a capacity of 52 million gallons per day that transports water from Crystal Springs Pump Station at the base of Lower Crystal Springs Dam to the University Mound Reservoir in San Francisco. CSPL2 has eight sections, or “reaches,” with each reach beginning and ending at an isolation valve. The approved project included work across various portions of seven reaches (Reaches 2 through 8) of CSPL2 as well as a variety of staging areas in close proximity to the pipeline. The approved project included pipeline rehabilitation and seismic retrofit activities at 15 sites; general improvements at four sites; pipeline replacements at 15 sites; sliplining at two sites; pipeline relocation at two sites; retrofitting pipe bridge piers at two sites; cathodic protection equipment installation at nine sites; and insulated flange joint installation, referred to as *electrical isolation*, at up to 31 sites. The approved project alignment crosses unincorporated San Mateo County, the Town of Hillsborough, and the cities of San Mateo, Burlingame, Millbrae, San Bruno, South San Francisco, Brisbane, and Daly City before it terminates in San Francisco.

The Sunset Supply Pipeline (SSPL) is a 79-inch-diameter steel water transmission pipeline that conveys water from the SFPUC’s Peninsula Watershed to northern Peninsula customers. The SSPL is approximately 20 miles long, beginning at the Crystal Springs Pump Station in unincorporated San Mateo

1 SFPUC, *Crystal Springs Pipeline No. 2 Replacement Project, Final Environmental Impact Report*, SF Planning Case No. 2005.0963E, State Clearinghouse No. 2008112050, certified September 30, 2010.

2 The final approved project—as described in the EIR for the Crystal Springs Pipeline No. 2 Replacement Project—is referenced in this addendum as the “approved project.”

County and terminating at the Sunset Reservoir in the City of San Francisco. The southern portion of the SSPL, which traverses unincorporated San Mateo County and the Town of Hillsborough, runs adjacent to and parallel with CSPL2 and is located within the same right-of-way.

Since completion of construction of the approved project in 2013, the SFPUC has conducted inspections of water transmission infrastructure within the CSPL2 right-of-way, including the SSPL. In 2024, the SFPUC discovered that severe erosion along the west bank of San Mateo Creek had exposed two segments (approximately 10 and 20 feet long, respectively) of the SSPL, approximately 1,000 feet north of the intersection of Tartan Trail Road and Crystal Springs Road.³ The exposed segments of the SSPL are at heightened risk of structural damage and failure because the erosion removes soil support and subjects the pipe to direct flow, debris impacts, and scour, which can result in leaks, breaks, and service disruption.

To repair the existing erosion and protect the SSPL from additional exposure along the west bank of San Mateo Creek at these two sites, the SFPUC is proposing to construct the following improvements: 1) installation of two concrete walls—one at each exposed pipe segment location—positioned between the pipeline and the creek, with *engineered backfill*⁴ placed behind and between the two walls along the top of bank; 2) installation of a *bioengineered creek embankment*⁵ and placement of woody materials along the creek side of the walls; and 3) improvements to the existing SFPUC access road along the pipeline in the vicinity of the repairs. These improvements would extend the service life of the existing pipeline and improve system reliability while maintaining the existing San Mateo Creek channel configuration to the extent feasible.

The proposed erosion repair and bank stabilization activities along the SSPL were not included as part of the approved project. Therefore, this addendum evaluates the environmental effects of these activities, referred to herein as the *modified project*.

2. Proposed Modifications to Project

The modified project would occur within the same right-of-way as the approved project and, similar to the approved project, would involve activities intended to maintain the integrity and reliability of the existing SFPUC regional water transmission infrastructure. The approved project included replacement of pipe bridge piers at several locations along San Mateo Creek as well as tree removal and grading of the creek banks to create embankments for temporary bridges, staging areas, or access roads. Although work on the SSPL was not addressed in the FEIR, the approved project did address pipeline rehabilitation for Reach 2 of CSPL2 within close proximity to the modified project site. Specifically, the approved project Site 4 (general pipeline improvements) and site 5 (pipe replacement, general, improvements and retrofit of pipe bridge piers) are approximately 1,000 feet south and 600 feet north of the project area, respectively, within the SFPUC's fee title or easement lands and entailed work within San Mateo Creek.

³ Meridian Surveying Engineering, Inc. *Condition Assessment of Existing Sunset Supply Pipeline Study Area*, August 2024.

⁴ Engineered backfill (or fill) is soil or aggregate material that is placed and compacted in layers to meet specific engineering requirements for strength, density, and stability.

⁵ A bioengineered creek embankment is a method of stabilizing a creek bank using a combination of living plant materials and, sometimes, natural or synthetic support structures. This “soft” engineering approach uses the natural strength of vegetation to prevent erosion, control sediment, and restore habitat, as an alternative to traditional “hard” methods like concrete or riprap.

The FEIR addressed potential impacts on the creek (i.e., jurisdictional waters), riparian habitat, sensitive habitats, and special-status species, and identified mitigation measures to reduce the impacts to less-than-significant levels.

As shown on **Figure 3-1**, the modified project site is an approximate 400-foot-long and 70-foot-wide area of the SSPL alignment along San Mateo Creek and the adjacent SFPUC access road that extends between Tartan Trail Road and the SFPUC's Hillsborough Valve Lot. The project site encompasses riparian habitat and vegetated hillside slopes. Surrounding land uses include the San Mateo Creek open space corridor, single-family residential neighborhoods in the Town of Hillsborough, public roadways, and existing SFPUC water transmission facilities.

The modified project site also encompasses an adjacent staging area to the north, within the SFPUC's Hillsborough Valve Lot (refer to Figure 3-1, p. 4). The staging area and the modified project site is within the SFPUC's fee-owned property (Assessor Parcel Numbers 093-131-010 and 093-132-010) in the Town of Hillsborough. Construction access to the staging area and modified project site would be through an existing access gate at the Hillsborough Valve Lot off Crystal Springs Road, approximately 1,000 feet south of the intersection of Crystal Springs Road and Woodridge Road.

3. Description of the Modified Project

The SFPUC proposes to construct erosion repairs and structural bank stabilization improvements along an approximately 400-foot-long reach of the SSPL, within which two segments of the pipeline are exposed along the west bank of San Mateo Creek. The modified project would prevent further erosion, stabilize the creek bank and adjacent slopes, protect the pipeline by re-establishing engineered support, and maintain maintenance access, while retaining the general configuration of the creek channel. Specific project elements would include construction of the following:

- Two concrete walls placed between the creek and the pipeline, one at each of the two erosion sites where the SSPL is exposed, with engineered backfill placed behind each wall.
- Bioengineered creek embankments and placement of woody materials along the creek side of the walls with riprap placed at each end of the walls
- Improvements to the existing SFPUC access road along the pipeline in the vicinity of the repairs, including light grading, compacted gravel, and new drainage across the road

The project components and construction activities are detailed below and shown on **Figure 3-1**. A cross-section (plan view) of the proposed modified project components is shown on **Figure 3-3**, p. 6.

Construction would occur over approximately 4 to 6 months in the dry summer season of 2027, from May/June to September/October. Construction activities would entail the following activities: site preparation including vegetation removal and installation of a cofferdam to bypass creek flows; construction of the concrete walls and placement of engineered backfill behind the walls; installation of bioengineered creek embankments with riprap placed at each end of the walls; access road improvements; and site restoration.

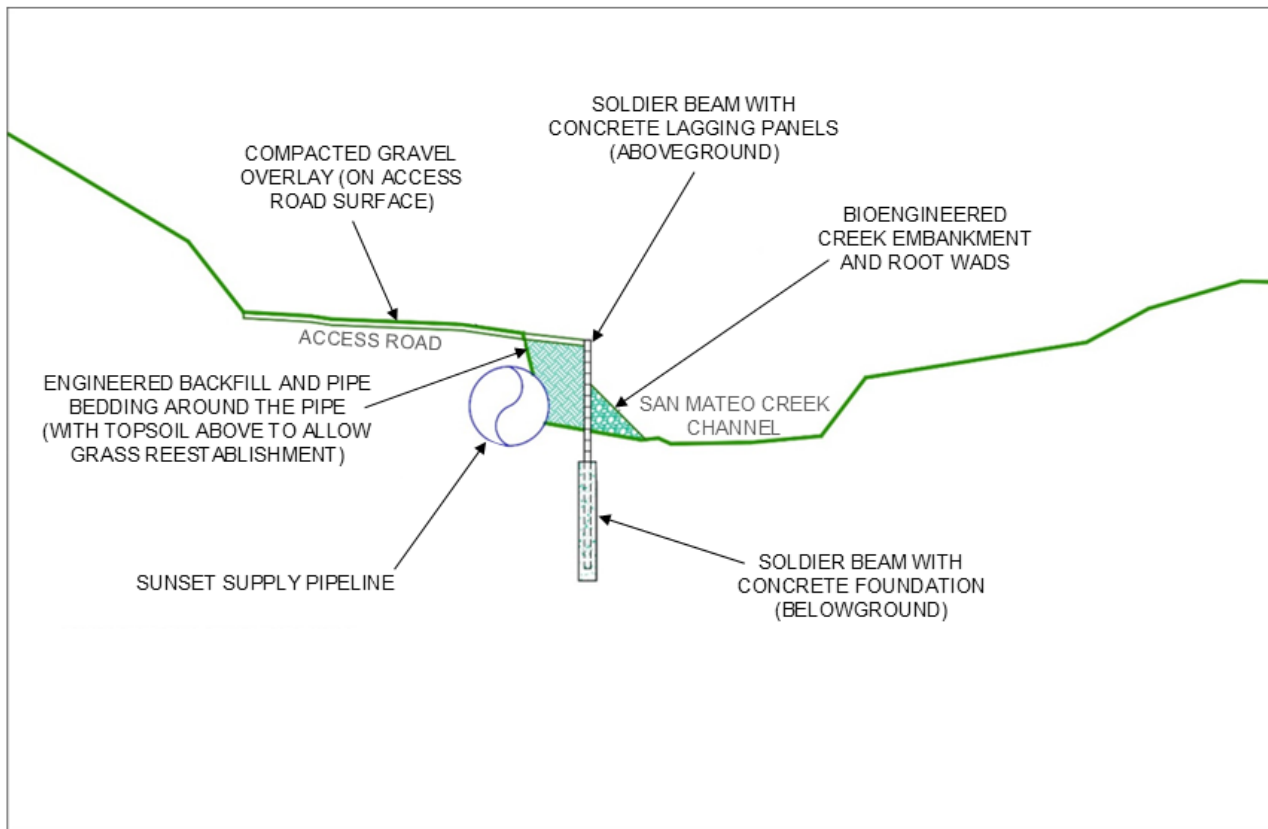
Figure 3-1: SSPL Modified Project Vicinity Map



Figure 3-2: Modified Project Map



Figure 3-3: Cross Section of Modified Project



Source: SFPUC, Sunset Supply Pipeline Erosion Repair Project – Site Plan, October 2025

3.1 Modified Project Components

3.1.1 Concrete Walls and Engineered Backfill

A concrete wall would be installed between San Mateo Creek and the SSPL at each of the two exposed segments, to stabilize the creek bank and protect the pipeline (i.e., two separate walls). The northern wall would be approximately 60 feet long, and the southern wall would be approximately 90 feet long; each wall would be approximately 1-foot wide. The aboveground section of the walls would vary, based on creek topography, and would extend approximately 10 feet in height from below the creek bed to the top of bank. The foundation of the wall would be approximately 2 feet wide and would extend another approximately 15 feet below ground, for a total wall height of approximately 25 feet.

As shown on Figure 3-3, engineered backfill would be placed behind the new walls (away from the creek). The reconstructed slope would assist in creating stable topography, tying the new walls into the access road, as well as ensure long-term slope stability consistent with SFPUC Right-of-Way Landscape Vegetation Guidelines.⁶

⁶ SFPUC, *Right-of-Way Integrated Vegetation Management Policy*, SFPUC Resolution No. 15-0014, January 13, 2015.

3.1.2 Creek Embankments

Bioengineered creek embankments would be placed along the creek side of each wall, to provide habitat, slow the creek flows along the wall, and help stabilize the creek bank. The embankments would extend from the creek bed to mid-wall height (i.e., a partial embankment), so that the upper portions of the walls would remain as exposed concrete.⁷ Each embankment would be comprised of vegetated soil lifts,⁸ wood stakes, recovered logs, and root wads. This material would be reused from vegetation and woody debris that would be removed during modified project site preparation activities. The existing creek bed alignment would be retained.

In addition to the creek embankments, riprap would be placed at four locations, at the end of each wall and beneath the drainpipe (refer to Section 3.1.3).

3.1.3 Access Road and Drainage Improvements

Within the modified project work area, the existing unpaved access road along the SFPUC right-of-way would be regraded for runoff to flow toward San Mateo Creek and resurfaced with an approximately 7-inch-deep layer of compacted gravel to provide a stable, durable surface for long-term maintenance access. These improvements would restore proper drainage, reduce future erosion potential, and allow reliable maintenance access along the right-of-way.

A drainpipe would be installed to convey stormwater from the uphill natural drainage (ephemeral drainage) across the access road to the creek. It would be approximately 30 feet long, 18 inches wide, and 18 inches deep, and would extend to the top of bank. Riprap would be placed below the creek bank to stabilize the bank.

3.2 Modified Project Construction

Modified project construction activities would include site preparation, construction of the concrete walls and engineered backfill, installation of the creek embankments, access road improvements, and post-construction site restoration as described below.

3.2.1 Site and Pipeline Preparation

Site preparation activities would facilitate access along the SFPUC right-of-way to the work area and establish temporary staging areas to support construction activities (see Section 3.2.6, Staging and Site Access). Site preparation would include removing existing vegetation within the work area as needed, installing temporary pipeline markers and materials to protect the pipeline during construction, and installing a temporary cofferdam and creek bypass for in-channel work. Site preparation activities are further discussed below.

Vegetation Removal

Vegetation and tree removal along the west bank of San Mateo Creek would be required to provide access for construction and bank stabilization activities, and to bring the surrounding area into

⁷ The modified project would entail a partial creek embankment height. However, for this CEQA analysis, embankment fill volumes and truck trips are estimated for a full embankment, to provide a conservative analysis.

⁸ A vegetated soil lift is an engineered construction method that uses layers of soil wrapped in a strong, biodegradable fabric to rebuild and stabilize eroded slopes. Vegetation then is inserted within and between these layers.

compliance with the SFPUC's Right-of-Way Integrated Vegetation Management Policy.⁹ Vegetation removal activities would include removal of approximately 20 to 30 trees with a diameter breast height of 4 inches or greater and may include the following tree species: arroyo willow (*Salix lasiolepis*), Oregon ash (*Fraxinus latifolia*), California bay laurel (*Umbellularia californica*), California buckeye (*Aesculus californicus*), boxelder (*Acer negundo*), and coast live oak (*Quercus agrifolia*). Approximately 70 cubic yards of cleared vegetation (e.g., logs, root wads, and other materials) would be stockpiled temporarily onsite and reused as fill for the bioengineered creek embankments, where feasible.

Pipeline Identification and Protection

Before the start of construction, markers would be placed along the SSPL alignment within the modified project area, to identify the location of the pipe and prevent accidental damage during operation of construction equipment. Construction equipment would not be permitted to travel directly over the pipe unless temporary protection measures are in place. These measures may include installation of steel plates along portions of the access road, where equipment is expected to cross over the pipeline. Steel plates would be installed and positioned using a forklift and left in place for the duration of the work requiring pipeline protection.

Temporary Cofferdam and Creek Bypass Pipe Installation

A temporary trapezoidal cofferdam and bypass system would be installed at grade near the southern end of the modified project area, to isolate the in-channel work zone and maintain dry conditions during wall and embankment construction. As needed, gravel bags would be placed upstream in the creek to retain water during construction of the cofferdam. Temporary cofferdam placement would require limited hand-clearing to prepare an approximately 10-foot-wide by 10-foot-long area of the creek bottom, where the temporary cofferdam would be installed. The cofferdam would be approximately 5 feet tall, approximately 10 feet wide, and approximately 25 feet long. The cofferdam would be constructed using approximately 50 cubic yards of riprap, sandbags, or other materials, and a bypass pipe in the base of the cofferdam would convey creek flows.

An approximately 400-foot-long, 24-inch-diameter temporary bypass pipe would be placed along the creek bed. The bypass pipe would pass through the cofferdam, to divert creek flows around the active construction area during the construction period. The bypass would be designed to convey 20 cubic feet per second flows, consistent with typical San Mateo Creek dry season flows.¹⁰

3.2.2 Concrete Walls and Engineered Backfill

Each of the two proposed concrete walls that would be constructed along the west bank would be supported by wide-flanged steel *soldier beams with concrete lagging panels*¹¹ comprising the wall face.

An approximately 4-foot-wide trench for the wall alignment would be excavated, generally parallel to the creek embankment, and approximately 3 feet below the creek bed. Approximately twenty 12-inch-diameter bores would be pre-drilled along the proposed wall locations (approximately 12 bores at the

⁹ SFPUC, *Right-of-Way Integrated Vegetation Management Policy*, SFPUC Resolution No. 15-0014, January 13, 2015.

¹⁰ SFPUC, *Sunset Supply Pipeline Erosion Protection/Control along San Mateo Creek, Design Criteria Memorandum*, prepared by Water Resources Engineering, Inc. and Mott MacDonald, March 2026.

¹¹ A soldier beam is a strong, vertical support, usually a steel H-beam or pile and a concrete lagging panel is a heavy-duty concrete board used to create a wall that holds the soil back.

northern segment and eight bores at the southern segment), to a depth of approximately 17 feet below the existing creek bed. Soldier beams would be inserted into the pre-drilled bores and encased in a concrete foundation.

After the soldier beams are set, approximately 8-foot-long by 6-inch-wide by 12-inch-high pre-cast concrete lagging panels would be installed horizontally between the soldier beam flanges, forming the completed wall face.

After the concrete walls are constructed, engineered backfill would be placed behind the new walls and the pipeline. This backfill zone would be comprised of pipe bedding, placed at the bottom of the exposed SSPL segments; engineered backfill, installed above the bedding to restore ground elevations; and a topsoil cap, applied to allow the vegetation to reestablish. A total of approximately 180 cubic yards of engineered backfill would be placed for the modified project.

3.2.3 Creek Embankments

Bioengineered creek embankments would be placed on the creek side of the concrete walls after construction of the walls. Limited excavation of the creek bed or bank may be required at certain locations for embankment placement. The proposed embankments would require up to approximately 260 cubic yards of bioengineered material.¹² This would include up to approximately 150 cubic yards for the embankments along the southern wall and up to approximately 110 cubic yards for the embankments along the northern wall. The embankments would be constructed at a 1:1 slope and built from the creek bed to approximately mid-wall height or to the top of the walls.

In addition, approximately 70 cubic yards of riprap would be placed on the creek side of the concrete walls at four locations – at both ends of each wall and beneath the drainpipe (described below).

3.2.4 Access Road and Drainage Improvements

An existing above grade 8-inch-diameter drainpipe that extends under the access road to the top of the creek bank would be removed from the northern area of the modified project site.

Following drainpipe removal, approximately 400 linear feet of the approximately 33-foot-wide existing access road would be lightly regraded to provide a uniform surface, sloping from the hillside toward San Mateo Creek. Grading would be limited to surface shaping only, with no excavation beyond minor adjustments to restore proper drainage. A new drainpipe would be installed near the southern area of the site, across the access road.

After being regraded, the existing access road would be resurfaced with an approximately 7-inch-deep compacted gravel, placed at-grade. The gravel would be spread across the full width of the access road, shaped to achieve the required cross-slope, and compacted to create a stable surface that would be suitable for construction access and long-term maintenance.

3.2.5 Post-Construction Site Restoration

Site cleanup and demobilization would occur after the completion of all construction activities. The temporary creek bypass and cofferdam would be removed from the creek bed, and all temporary

¹² As described above, the modified project would entail a partial creek embankment. However, for this CEQA analysis, a full embankment was assumed to provide a conservative estimate for potential fill volumes and truck trips.

pipeline protection materials (e.g., steel plates) would be removed from the site. Any construction debris would be hauled offsite to an appropriate green-waste or materials-recycling facility (e.g., Shoreway Environmental Center in San Carlos, Ox Mountain Landfill in Half Moon Bay) or disposed of at an approved location, in accordance with the SFPUC's requirements. The staging area and all temporarily disturbed areas then would be cleared of remaining materials, equipment, and vehicles, and be restored to pre-construction conditions. Any intact low-growing herbaceous vegetation (e.g., grasses and forbs) removed during site preparation would be planted within a 15-foot buffer of the SSPL alignment.

3.2.6 Staging and Site Access

The modified project would use an approximately 60-foot by 30-foot staging area in the Hillsborough Valve Lot, as shown on Figure 3-1 (p. 4). The staging area may be used for construction worker parking and equipment and materials storage. Temporary fencing would be used to secure work areas.

As shown on Figure 3-3 (p. 4), access to the modified project area would be via an existing SFPUC access road off Crystal Springs Road that provides direct access to the Hillsborough Valve Lot, where the staging area would be located. From the staging area, the work site would be accessed via an existing dirt road that extends from the Hillsborough Valve Lot southward, through the western side of the modified project area and terminates at Tartan Trail Road. Construction vehicles and haul trucks would access the modified project area via public roadways, including Crystal Springs Road, Polhemus Road, Tartan Trail Road, and other local streets within the Town of Hillsborough and unincorporated San Mateo County. These roadways would provide connections from the modified project area to regional highways, including Interstate 280 and U.S. Highway 101.

Crystal Springs Road is generally narrow and has limited shoulders, resulting in constrained space for vehicle maneuvering. Thus, equipment and material deliveries may require temporary traffic controls.

3.2.7 Material and Equipment - Import and Export

The modified project would require importing construction equipment and supplies, including steel plates, riprap or other materials for the cofferdam, concrete and soldier beams for the walls, and approximately 440 cubic yards of fill materials for the engineered backfill and creek embankment.

The modified project may require a limited amount of excavation; spoils and vegetation are anticipated to be reused onsite. Approximately 10 cubic yards of construction debris would be off-hauled at the end of construction, primarily associated with removal of the cofferdam, steel plates, and temporary fencing. Excavated spoils and vegetation that are removed would be stockpiled temporarily at the construction staging area and would be covered with plastic sheeting or tarps, have berms installed around the perimeter, and have plastic sheeting installed beneath the stockpile if placed on pervious surfaces.

3.2.8 Construction Schedule and Duration

Construction would occur over approximately 4 to 6 months in the dry summer season of 2027, from May/June to September/October. The anticipated construction phasing and duration for each activity are summarized in **Table 3-1**.

Table 3-1: Modified Project Construction Phases and Durations

Construction Activity/Phase	Approximate Duration (weeks)
Mobilization, staging, and site preparation	6
Installation of concrete walls and engineered backfill	8
Installation of creek embankments	3
Access road and drainage improvements	1
Site cleanup and demobilization	2
Total	20 weeks*

Note:

* Construction activities/phases may be implemented concurrently, and the total construction duration would be subject to change. Construction duration would be approximately 4 to 6 months.

Construction activities would occur generally between 7 a.m. and 5 p.m., Monday through Friday. Weekend work may be required on a limited basis during critical construction phases. Any extended work hours would be scheduled to minimize impacts on local traffic and nearby residents and would be coordinated with the appropriate jurisdictions as needed.

3.2.9 Construction Workforce, Equipment, and Trips

Modified project construction would require an average of approximately four workers per day, with up to eight workers per day during peak construction phases. Worker parking would be accommodated within the SFPUC's Hillsborough Valve Lot.

The following equipment would be required for construction of the modified project:

- Auger/drill
- Backhoes
- Concrete mixers
- Cranes
- Dumpers/tenders
- Forklifts
- Generator
- Grader
- Hedge trimmer
- Pipe connection tools
- Delivery trucks
- Compactor
- Pruning saw

Modified project construction would require approximately 80 one-way truck trips, with approximately 1 truck trip per day on average and approximately 10 one-way truck trips per day maximum.¹³ Approximately four worker vehicle round trips (eight one-way trips) would be required each day, with a maximum of eight round trips (16 one-way trips) during the most intensive construction phases.

3.2.10 SFPUC Standard Construction Measures

The SFPUC has adopted standard construction measures, with the purpose of ensuring that environmentally responsible practices are applied to all SFPUC projects (excerpted below and provided in **Attachment A**). Because the measures apply to all SFPUC projects, including projects in San Francisco and other urban areas as well as projects in rural and natural areas, such as the SFPUC's watershed lands,

¹³ The modified project would entail a partial creek embankment height. However, for this CEQA analysis, embankment fill volumes and truck trips are estimated for a full embankment, to provide a conservative analysis.

the measures are necessarily broad. Accordingly, the measures may be tailored to fit specific projects. Some measures may not apply or may apply only partially to a given project. In addition, these measures may be superseded by more detailed project-specific mitigation measures and/or regulatory permit requirements. The standard construction measures, as well as any mitigation measures adopted as part of the California Environmental Quality Act (CEQA) review process, are required to be implemented pursuant to the construction contract specifications for all SFPUC projects. The applicability of the standard construction measures to the modified project is considered under the related resource topic analyses.

The SFPUC also would conduct all construction activities in compliance with applicable regulations and ordinances. Relevant requirements would be included in the contract specifications that would be issued for modified project construction.

3.3 Operation and Maintenance

Upon completion of the modified project, the SFPUC would continue to operate and maintain the SSPL in accordance with existing procedures and maintenance schedules. The modified project would not increase the size, capacity, or operational demands on the SSPL. Routine maintenance activities, including inspection of the pipeline, valves, right-of-way, and access road, as needed, and other scheduled maintenance tasks, would continue to be performed by existing SFPUC personnel and/or contractors.

4. Modified Project Approvals

This addendum is intended to provide the information and environmental analysis necessary to assist the public agency decision-makers in considering the approvals necessary for the planning, development, construction, operation, and maintenance of the modified project. The permits and approvals anticipated to be required from state and local agencies are listed below. The project may be subject to various local regulations; permits from the California Department of Transportation, San Mateo County, and/or various local jurisdictions could be required. However, under California Government Code section 53090 et seq., the SFPUC receives intergovernmental immunity from the zoning and building laws of other cities and counties for its lands, and therefore local regulations may not be applicable to the SFPUC. The SFPUC also would obtain any other regulatory approvals, as required by law.

Federal Actions and Approvals

- U.S. Army Corps of Engineers Clean Water Act Section 404 Nationwide Permit for impacts on federally jurisdictional aquatic features
- U.S. Fish and Wildlife Service Federal Endangered Species Act (ESA) Section 7 Consultation for take of federally listed species
- National Marine Fisheries Service Federal ESA Section 7 Consultation for take of federally listed species

State Actions and Approvals

- Regional Water Quality Control Board, San Francisco Bay Region
 - Clean Water Act section 401 Water Quality Certification for impacts on waters of the state

- California Department of Fish and Wildlife section 1602 Lake and Streambed Alteration Agreement for impacts on San Mateo Creek
- State Historic Preservation Officer National Historic Preservation Act Section 106 Consultation

Local Actions and Approvals

- San Francisco Public Utilities Commission
 - Adoption of the refined mitigation monitoring and reporting program
 - Approval of the modified project
- San Mateo County Public Works Department and Town of Hillsborough encroachment permits, if needed
 - The SFPUC would consult/coordinate with local municipal departments in San Mateo County and the Town of Hillsborough, so that soil disturbance and site mitigation, dust control, noise control, and construction associated with the modified project would comply with the substantive requirements of applicable local laws.

5. CEQA Approach

San Francisco Administrative Code section 31.19(c)(1) states that a modified project must be reevaluated and also states, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of the CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.” CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent EIR for a project that is already adequately covered in a previously certified EIR. An addendum to a certified EIR may be prepared if some changes or additions are necessary, but none of the conditions described in section 15162 calling for the preparation of a supplemental or subsequent EIR have occurred.

This addendum to the FEIR documents the environmental effects of the proposed modifications to the approved project, which entails the construction of concrete walls and engineered fill, placement of creek embankments, and access road and drainage improvements to the SSPL, as described in Section 3, Description of the Modified Project. As discussed in Section 3.3, Operation and Maintenance, operation of the modified project would not result in changes to existing operations and maintenance practices for SSPL; therefore, the analyses focus on environmental effects resulting from construction of the modified project. This addendum compares the impacts resulting from the modified project to the impacts of the approved project as disclosed in the FEIR and explains why the proposed modifications would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant environmental impacts.

Since certification of the FEIR, several changes have occurred in the circumstances under which the modified project would be undertaken, the regulatory framework, and/or the planning department's approach to analysis. These changes include the following: 1) new environmental regulations and requirements for application of the updated SFPUC standard construction measures to all construction projects; 2) new information regarding cumulative projects proposed in the vicinity; and 3) updates to CEQA Guidelines. These changes are described further in the subsections below. As analyzed in this addendum, the modified project under these changed circumstances would not materially change any of the conclusions of the certified FEIR.

5.1 New Environmental Regulations and SFPUC Standard Construction Measures

Since the certification of the FEIR in 2010, new city and state regulations have been adopted to address some of the environmental impacts for which mitigation measures were required in the FEIR. As discussed where applicable in Section 6, Analysis of Potential Environmental Effects, regulations that are equally effective as the mitigation requirements are considered to supersede FEIR mitigation measures and, therefore, certain FEIR mitigation measures are no longer necessary to reduce environmental impacts of the modified project to a less-than-significant level.

The SFPUC also updated and adopted its standard construction measures in 2015 (Attachment A), subsequent to certification of the FEIR for the approved project. They are included as part of SFPUC construction contracts and are monitored for compliance. Accordingly, in addition to complying with all applicable local, state, and federal laws and regulations, the Planning Department considers implementation of these standard construction measures as part of the regulatory framework for the evaluation of environmental impacts of the modified project. Section 6, Analysis of Potential Environmental Effects, analyzes the applicability of the updated standard construction measures to the modified project and, in some instances where the standard construction measures meet or exceed the requirements of the mitigation measures identified in the FEIR, this addendum has determined that the FEIR mitigation measures are no longer required to reduce impacts of the modified project to a less-than-significant level.

5.2 Cumulative Impact Analysis Development

Since the certification of the FEIR in 2010, the circumstances of cumulative projects in the vicinity have changed, as projects proposed or under development at that time have been completed and new projects are currently proposed. Accordingly, this addendum provides updated cumulative impact analyses for the environmental topics considered in detail.

CEQA Guidelines section 15130(b)(1)(A) defines cumulative projects as past, present, and probable future projects producing related or cumulative impacts. CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis as follows: the “list-based approach” and the “projections-based approach.” The list-based approach uses a list of projects producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts.

As permitted in CEQA Guidelines section 15130(b)(1), the cumulative impacts analyses in this addendum employ the list-based approach. The list of cumulative projects was developed through review of adopted planning documents and publicly available development and entitlement records from the Town of Hillsborough and San Mateo County. In the list-based approach, a list of reasonably foreseeable future projects that would cause impacts that could combine with the incremental impacts of the project to cause or contribute to cumulative effects.

Table 5-1 provides a list of current or future projects considered in the analysis of cumulative impacts for the modified project. A map of these cumulative projects is shown on Figure 5-1, p. 16. As discussed above, because the modified project would be operated and maintained similarly to the existing operations of CSPL2 as well as the existing operations of SSPL, the cumulative projects list is limited to

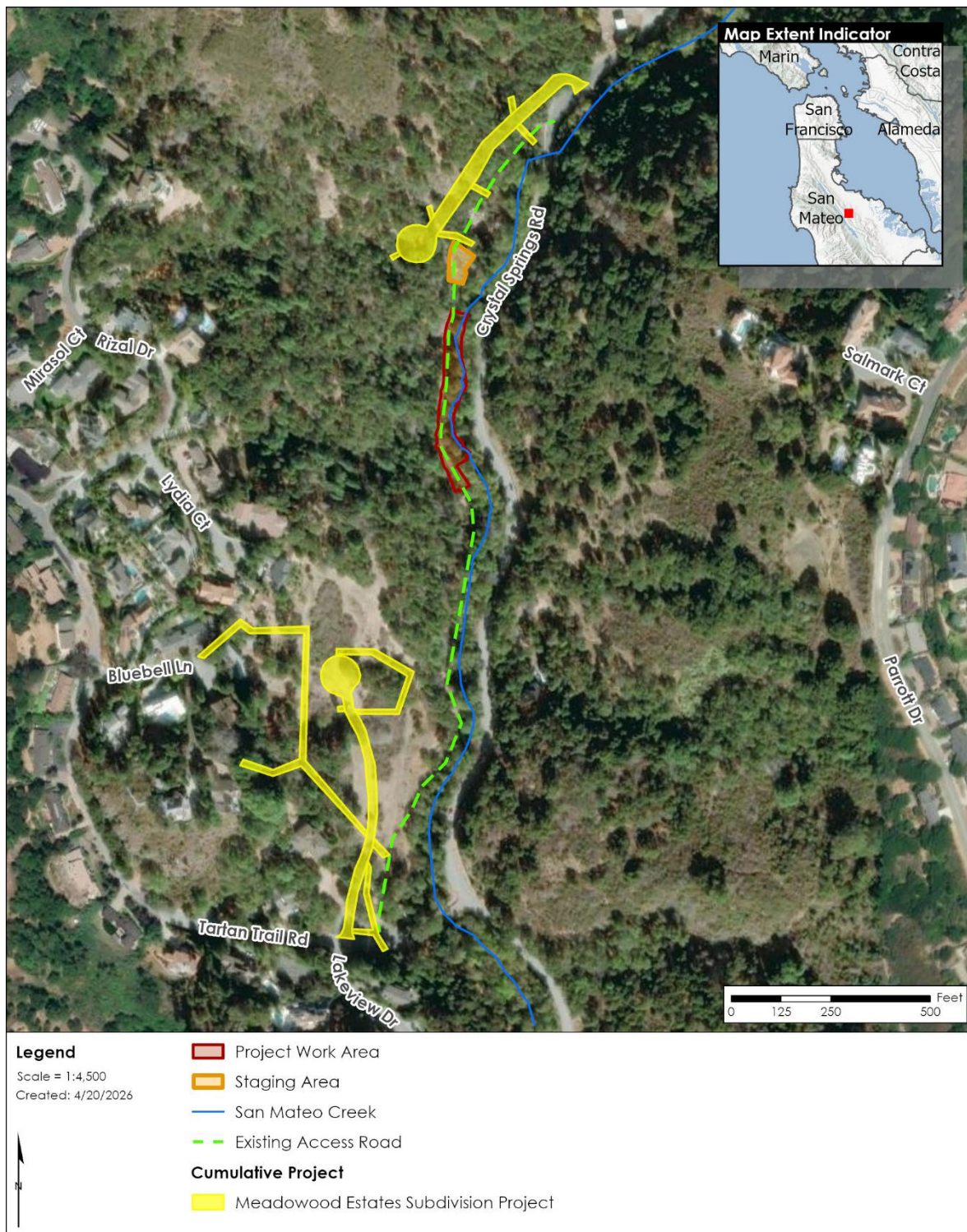
projects that may be in construction at the same time as the modified project. The specific approach to the cumulative analysis is discussed in each topical subsection of this addendum.

Table 5-1: Cumulative Projects

Cumulative Project Name	Description	Estimated Construction Period	Location
Meadowood Estates Subdivision (Callan Subdivision)	The project would merge three existing parcels located north of Tartan Trail Road and west of Crystal Springs Road into a single parcel, then subdivide the single parcel into eight new parcels (lots) and construct two roads with underground utility infrastructure to serve future anticipated home construction (not part of this development plan). The project would require approximately 24,000 cubic yards of excavation, grading of hillsides, and construction of retaining walls to conform existing slopes to a finished grade (or possible geofabric/geotextile hillside stabilization). Approximately 100 trees would be removed initially for road/infrastructure construction, with another 222 to be removed for future home construction.	Unknown, construction contract is currently being advertised	Adjacent to modified project staging area

Source: Town of Hillsborough assisted by MIG, Meadowood Estates Subdivision Project Draft Environmental Impact Report, October 2018; Town of Hillsborough 2025

Figure 5-1 Cumulative Projects Map



5.3 Updates to CEQA Guidelines

Since certification of the FEIR in 2010, certain resource topics in the CEQA Guidelines Appendix G Environmental Checklist Form have been updated as described below. CEQA section 21099(b)(1) required that California Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that promote the “reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” CEQA section 21099(b)(2) states that, upon certification of the revised CEQA Guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

In December 2018, OPR published a Technical Advisory on Evaluating Transportation Impacts in CEQA¹⁴ (transportation impact guidelines) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle. In January 2019, changes to the CEQA statutes and guidelines went into effect, including a new section 15064.3 that states that VMT is the most appropriate measure of transportation impacts and that includes updated criteria for analyzing transportation impacts. Therefore, this addendum provides a VMT impact analysis of the transportation effects of the modified project for informational purposes and does not provide a discussion of automobile delay in Section 6.6, Traffic, Transportation, and Circulation. Automobile delay may be considered by decision-makers separately of the environmental review process as part of their decision to approve, modify, or disapprove the proposed project.

The CEQA Guidelines Appendix G Environmental Checklist Form has also been updated to add the topics of tribal cultural resources and wildfire. While tribal cultural resources and wildfire topics were not addressed as individual topics in the FEIR, these topics were addressed in other sections of the FEIR. Tribal cultural resources were considered in FEIR Section 5.4, Cultural Resources, and impacts related to wildfire were discussed in FEIR Section 5.14, Hazards and Hazardous Materials for the approved project. Similarly, they are discussed under Section 6.3, Cultural and Tribal Cultural Resources, and Section 6.8, Hazards and Hazardous Materials, below.

¹⁴ California Office of Planning and Research. (December 2018) Technical Advisory on Evaluating Transportation Impacts in CEQA. https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

6. Analysis of Potential Environmental Effects

The FEIR evaluated potential physical environmental impacts of the approved project and found that implementation of the approved project would result in significant environmental effects that could be mitigated to a less-than-significant level with implementation of mitigation measures, except for construction-related noise, transportation, and land use impacts, which would remain significant and unavoidable. A Mitigation Monitoring and Reporting Program was required for the approved project and adopted by the SFPUC on October 15, 2010 (Resolution No. 10-0174) and the City and County of San Francisco Board of Supervisors on November 16, 2010 (Resolution No. 546-10). Applicable mitigation measures required for the approved project would also be required for the modified project.

Whereas the FEIR addressed environmental impacts at numerous locations along 19 miles of the CSPL2 pipeline alignment, the modified project alignment is limited to an approximately 400-foot-long span of SSPL located in close proximity to FEIR Sites 4 and 5. Consequently, the FEIR includes mitigation measures specific to locations that are not included in the modified project site. The discussion below compares the FEIR findings for project sites along San Mateo Creek (e.g. General Improvements at Site 4 and Retrofitting or Replacing Pipe Support Piers and Improvements at Site 5) that are most similar in location and work to the modified project. Certain mitigation measures are not applicable to the modified project or have been refined to address specific modified project conditions. The analyses below identify the mitigation measures applicable to the modified project by environmental topic and indicate revisions in strikethrough and double-underline for deletions and additions, respectively. A refined Mitigation Monitoring and Reporting Plan (MMRP) (Attachment B) has been prepared for the modified project to reflect the analyses below, showing changes that pertain to the applicable mitigation measures.

This addendum evaluates whether the environmental impacts of the modified project are addressed in the FEIR. The modified project includes construction of two concrete walls and placement of engineered backfill/fill, placement of creek embankments along the walls, and access road improvements along San Mateo Creek, which are similar activities to those described for the approved project evaluated in the FEIR; therefore, only those environmental topics requiring additional analysis or new analysis for the modified project are discussed in detail below.

Environmental topics for which less detail is needed to conclude that the modified project would have no impacts or less-than-significant impacts are addressed in Section 6.13, Wind and Shadow, Population and Housing, Agricultural and Forest Resources, and Mineral Resources .

6.1 Biological Resources

6.1.1 FEIR Summary

The FEIR identified biological resources along the CSPL2 alignment, which traverses a variety of developed areas and undeveloped habitats that have the potential to support special-status species, sensitive natural communities, and aquatic resources, primarily in the southern portion of the project alignment within unincorporated San Mateo County and the cities of Hillsborough and Burlingame (including Sites 4 and 5).

The FEIR determined that the approved project would result in potentially significant impacts on jurisdictional waters and riparian habitat, sensitive habitats (such as serpentine bunchgrass and San

Mateo Creek), special-status species, and protected trees (as defined by local ordinances). These impacts would be reduced to less than significant with implementation of Mitigation Measures M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat), M-BI-1b (Environmental Awareness Training), M-BI-2a (Vegetation Restoration Plan), M-BI-2b (Protection of Sensitive Habitats), M-BI-3a (Protection of San Mateo Woolly Sunflower, Crystal Springs Lessingia, Franciscan Onion, and San Francisco Collinsia), M-BI-3b (Protection of Mission Blue Butterfly and Callippe Silverspot Butterfly), M-BI-3c (Protection of Steelhead), M-BI-3d (Protection of California Red-Legged Frog and San Francisco Garter Snake), M-BI-3e (Protection of Nesting Birds), M-BI-3f (Protection of Bats), M-BI-3g (Protection of San Francisco Dusky-Footed Woodrat), M-BI-5a (Replacement of Trees to be Removed), and M-BI-5b (Protection of Trees to be Retained).

6.1.2 Modified Project Analysis

A Biological Resources Assessment (biological assessment)¹⁵ and an Aquatic Resources Delineation Report (aquatic delineation)¹⁶ were prepared for the modified project to evaluate the presence of, and potential for, sensitive biological resources within the modified project area and information from the reports is presented below.

As with the approved project analyzed in the FEIR, the modified project is not located within the boundaries of an adopted habitat conservation plan or natural community conservation plan and would not conflict with the provisions of any such plan. Therefore, this criterion is not discussed further.

A discussion of special-status plant species; special-status wildlife species; nesting migratory birds and roosting bats; sensitive natural communities; jurisdictional waters and wetlands; wildlife movement, migration corridor, and habitat connectivity; and local policies and ordinances protecting biological resources is provided below.

Special-Status Plant Species

Two special-status plant species are known to occur near the modified project area and along the access road. Populations of Franciscan onion (*Allium peninsulare* var. *franciscanum*; California Rare Plant Ranks [CRPR] 1B.2) and San Mateo woolly sunflower (*Eriophyllum latilobum*; federally and state endangered; CRPR 1B.1) are known to occur in the vicinity of the modified project but are not present within the modified project site. Although these special-status plants are located outside the modified project site, there are occurrences of both Franciscan onion and San Mateo woolly sunflower along the modified project access road and construction activities have the potential to disturb these plants during access to and around the project site, which would be a significant impact. Mitigation Measure M-BI-3a (Protection of San Mateo Woolly Sunflower and Franciscan onion) would be implemented to minimize impacts on special-status plants by requiring flagging of known plants for avoidance. Crystal Springs lessingia (*Lessingia arachnoidea*) and San Francisco Collinsia (*Collinsia multicolor*) were not observed within or adjacent to the modified project site.

With implementation of Mitigation Measure M-BI-3a (Protection of San Mateo Woolly Sunflower and Franciscan onion), impacts on special-status plant species would be **less than significant with mitigation**, and the modified project would not result in any new significant environmental impacts or

¹⁵ Panorama Environmental, Inc., *Biological Resources Assessment, Sunset Supply Pipeline Erosion Repair Project*, March 2026.

¹⁶ Panorama Environmental, Inc., *Aquatic Resources Delineation Report, Sunset Supply Pipeline Erosion Repair Project*, March 2026.

substantially increase the severity of a previously identified significant environmental impact related to special-status plants.

Special-Status Wildlife Species

The following three special-status wildlife species, steelhead – central California coast distinct population segment (DPS) (*Oncorhynchus mykiss irideus* pop. 8), California red-legged frog (*Rana draytonii*), and northwestern pond turtle (*Actinemys marmorata*), have a moderate potential to occur or to be present within the project vicinity for the modified project, as summarized in **Table 6-1**. As of April 2026, the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) is no longer designated as a California Species of Special Concern by the California Department of Fish and Wildlife (CDFW) and is therefore not included in the modified project analysis.

Table 6-1 Special-Status Wildlife Species with Moderate Potential to Occur or Be Present on the Project Site

Scientific Name	Common Name	Status	Habitat Requirements	Potential to Occur
Fish				
<i>Oncorhynchus mykiss irideus</i> pop. 8	steelhead – Central California coast DPS	FT, SSC	Fast flowing, highly oxygenated, clear, cool freshwater streams where riffles tend to predominate pools; small streams with high-elevation headwaters near the ocean that have no impassable barriers; spawning and high elevation headwaters.	Present. The project work area intersects San Mateo Creek, a perennial freshwater stream. Steelhead are monitored in San Mateo Creek by the SFPUC. ¹⁷
Amphibians/Reptiles				
<i>Rana draytonii</i>	California red-legged frog	FT, SSC	Semi-permanent or permanent water at least 2 feet deep, bordered by emergent or riparian vegetation, and upland grassland, forest, or scrub habitats for aestivation and dispersal.	Moderate Potential. The closest occurrence is approximately 1 mile southwest of the project site (California Natural Diversity Database [CNDDB] Occ. No. 533), recorded in 2021. Suitable dispersal and movement habitat is present along San Mateo Creek; however, optimal breeding habitat is limited or absent on the project site.
<i>Actinemys marmorata</i>	northwestern pond turtle	FC, SSC	Slow-moving streams, rivers, ponds, and freshwater marshes; nests in upland areas such as sandy banks or grassy open fields.	Moderate Potential. The closest occurrence is approximately 1.2 miles west of the project site along the shore of Crystal Springs Reservoir (CNDDB Occ. No. 747), recorded in 2006.

¹⁷ SFPUC Water Enterprise, Natural Resources and Lands Management Division and West Bay Biological Resources Section, and Stillwater Sciences. 2025. San Mateo Creek 2024 Aquatic Resources Monitoring

Scientific Name	Common Name	Status	Habitat Requirements	Potential to Occur
				Suitable dispersal and movement habitat is present along San Mateo Creek; however, optimal aquatic habitat (deep, slow-moving water with basking sites) is limited or absent within the project site.
* Status: FT: Federal Threatened FC: Federal Candidate for Listing SSC: California Department of Fish and Wildlife Species of Special Concern				

No special-status bird or invertebrate species were determined to have a moderate or greater potential to occur within the modified project vicinity.

Additional special-status wildlife species evaluated in the FEIR were determined to have low or no potential to occur within the modified project vicinity due to the absence of suitable habitat. Therefore, these species are not discussed further.

Similar to the approved project, construction activities associated with the modified project could result in temporary loss of habitat for special-status species, as well as direct injury to or mortality of individuals. Construction impacts on special-status species with moderate or greater potential to occur are discussed in more detail below.

Special-Status Fish (Steelhead – Central California Coast Distinct Population Segment)

Similar to the approved project, steelhead are present within San Mateo Creek and the project vicinity. San Mateo Creek within the modified project area provides aquatic habitat that may function as a migration corridor for steelhead. Additionally, spawning and rearing has been documented near the modified project site. Construction activities within and adjacent to San Mateo Creek could result in temporary disturbance of aquatic habitat, including increased turbidity, sedimentation, and the potential for direct injury to individuals during in-stream or near-channel work. In addition, accidental release of pollutants during construction could degrade water quality.

The modified project would implement SFPUC Standard Construction Measure #3 (Water Quality) and SFPUC Standard Construction Measure #6 (Hazardous Materials), which would reduce potential impacts related to sedimentation and the release of hazardous materials. Additionally, Mitigation Measures M-BI-1b (Environmental Awareness Training) and M-BI-3c (Protection of Steelhead) would be implemented to minimize disturbance of steelhead and their habitat and to avoid direct injury or mortality. With implementation of Mitigation Measures M-BI-1b (Environmental Awareness Training) and M-BI-3c (Protection of Steelhead), as well as SFPUC Standard Construction Measures #3 (Water Quality) and SFPUC Standard Construction Measure #6 (Hazardous Materials), impacts on steelhead would be **less than significant with mitigation**. Therefore, the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to special-status fish.

Special-Status Reptiles and Amphibians

Known occurrences for San Francisco gartersnake (*Thamnophis sirtalis tetrataenia*) are present within 2 miles of the modified project site; however, key aquatic habitat such as vegetated freshwater ponds, wetlands, or sloughs are absent from the project site. Therefore, the species has low potential to occur at the modified project site. Similar to Sites 4 and 5 of the approved project, California red-legged frog has a moderate potential to occur along San Mateo Creek, including the modified project site. Additionally, northwestern pond turtle has moderate potential to occur at the modified project site. Although suitable breeding habitat for California red-legged frog and optimal basking habitat for northwestern pond turtle are limited within the modified project site, San Mateo Creek and adjacent riparian habitat provide dispersal habitat for both species, and individuals may occur in the project vicinity or move through the work area. Therefore, construction activities within and adjacent to the creek could result in direct impacts, such as injury to or mortality of individuals if they are present. Ground disturbance and temporary excavations could also result in temporary displacement or entrapment. In addition, construction activities could result in indirect impacts on habitat, such as sedimentation or accidental release of pollutants into San Mateo Creek.

Mitigation Measures M-BI-1b (Environmental Awareness Training) and M-BI-3d (Protection of California Red-Legged Frog and Northwestern Pond Turtle), would be implemented. Furthermore, as discussed in Section 6.2: Hydrology and Water Quality, the modified project would implement SFPUC Standard Construction Measure #3 (Water Quality) and SFPUC Standard Construction Measure #6 (Hazardous Materials), which include erosion and sediment control measures and proper handling of hazardous materials to reduce potential impacts on California red-legged frog and northwestern pond turtle habitat.

With implementation of Mitigation Measures M-BI-1b (Environmental Awareness Training) and M-BI-3d (Protection of California Red-Legged Frog and Northwestern Pond Turtle), as well as SFPUC Standard Construction Measure #3 (Water Quality) and SFPUC Standard Construction Measure #6 (Hazardous Materials), impacts on special-status reptiles and amphibians would be **less than significant with mitigation**. The modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to special-status reptiles and amphibians.

Special-Status Invertebrates

There is no potential for special-status invertebrates to be present at the modified project site. There are no occurrences of callippe silverspot butterfly (*Speyeria callippe callippe*) within 2 miles of modified project site, and no suitable grassland habitat or larval host plants, such California golden violets (*Viola pedunculata*), are present within the vicinity of the modified project site. The species has no potential to occur at the modified project site. There are no occurrences of mission blue butterfly (*Icaricia icarioides missionensis*) within 2 miles of the modified project site, and no suitable grassland habitat or larval host plants, specifically the silver lupine varieties (*Lupinus albifrons* var. *collinus*, *Lupinus formosus*, and *Lupinus littoralis* var. *variicolor*), are present within the vicinity of the modified project site. No mission blue butterflies of any life stage were observed during biological surveys for the modified project. For these reasons, there is no potential for the mission blue butterfly to occur within the modified project site. Mitigation Measure M-BI-3b (Protection of Mission Blue Butterfly) would not be required for the modified project.

Therefore, impacts on the mission blue butterfly would be **less than significant**. The modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to special-status invertebrates.

Nesting Migratory Birds and Roosting Bats

Similar to Sites 4 and 5 of the approved project, the modified project site and surrounding area provide suitable nesting and foraging habitat for common migratory bird species, particularly within riparian woodland along San Mateo Creek. Most native migratory birds and raptors are protected under the federal Migratory Bird Treaty Act and sections 3503, 3503.5, and 3513 of the California Fish and Game Code.

No active bird nests were identified within the modified project site or vicinity; however, surveys were conducted outside the typical nesting season. Suitable nesting habitat is present, and nesting birds could occur within the modified project area during the breeding season.

Several bat species known to occur in San Mateo County roost in trees within riparian woodland and forested habitats. The modified project site contains mature riparian trees that may provide suitable roosting habitat. No evidence of bat roosting was observed during field surveys; however, bats could be present within suitable roost structures.

Construction activities associated with the modified project could result in disturbance of nesting birds or roosting bats if work occurs during the nesting or roosting period. Similar to the approved project, the modified project would implement Mitigation Measures M-BI-1b (Environmental Awareness Training), M-BI-3e (Protection of Nesting Birds), and M-BI-3f (Protection of Bats). With implementation of Mitigation Measures M-BI-1b (Environmental Awareness Training), M-BI-3e (Protection of Nesting Birds), and M-BI-3f (Protection of Bats), impacts on nesting migratory birds and roosting bats would be **less than significant with mitigation**. The modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to nesting migratory birds and roosting bats.

Sensitive Natural Communities (Riparian Woodland)

Vegetation within the modified project site is dominated by riparian woodland associated with San Mateo Creek, consistent with conditions evaluated at Sites 4 and 5 for the approved project. This community consists of arroyo willow and coast live oak alliances and includes a mix of native tree species such as arroyo willow, Oregon ash, California bay laurel, coast live oak, California buckeye, and box elder, with a variable understory of native shrubs, vines, and herbaceous species. Riparian woodland is considered a sensitive natural community and is subject to regulatory protections under section 1602 of the California Fish and Game Code. Other sensitive natural communities identified in the FEIR, such as serpentine bunchgrass, are not present within the modified project site and are not discussed further.

Construction activities associated with the modified project would occur within and adjacent to riparian woodland habitat and would result in temporary and permanent impacts on riparian vegetation, including trimming, removal of understory vegetation, removal of native trees, and localized disturbance within staging and work areas. In addition, construction could result in indirect impacts on habitat, such as soil compaction, introduction of invasive species, and degradation of habitat adjacent to the creek.

Similar to the approved project, impacts on sensitive natural communities would be reduced with implementation of Mitigation Measures M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat) and M-BI-2a (Vegetation Restoration Plan). Mitigation Measure M-BI-2b: Protection of Sensitive Habitats is not required for the modified project because there is no serpentine bunchgrass present within or adjacent to the modified project site. With implementation of Mitigation Measures M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat) and M-BI-2a (Vegetation Restoration Plan), impacts on riparian woodland would be ***less than significant with mitigation***. Therefore, the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to sensitive natural communities.

Jurisdictional Waters and Wetlands

Similar to Sites 4 and 5 of the approved project, jurisdictional waters and wetlands are present within the modified project site. As identified in the aquatic delineation, three aquatic resources were delineated within the modified project site, including one segment of San Mateo Creek and two additional aquatic features consisting of one ephemeral gully and one seasonal depression. An additional ephemeral gully is located north of the staging area and outside the boundary of the modified project site.

San Mateo Creek is a perennial stream that provides aquatic habitat within the modified project site and is expected to be subject to jurisdiction by the U.S. Army Corps of Engineers as waters of the United States, as well as by the Regional Water Quality Control Board (RWQCB) and CDFW. In addition, one ephemeral gully and one seasonal depression were delineated within the modified project site. These features are not expected to meet the criteria for waters of the United States but may be regulated as waters of the state by the RWQCB and may also be subject to CDFW jurisdiction under section 1602.

Construction activities associated with the modified project would occur within and adjacent to these aquatic resources and would result in temporary and permanent impacts to jurisdictional features, including placement of fill, vegetation removal, and alteration of streambed and bank. Temporary impacts are anticipated to occur to approximately 0.02 acres of Waters of the U.S. and approximately 0.03 acres of Waters of the State and includes placement of approximately 140 cubic yards of temporary fill within Waters of the U.S. and 182 cubic yards of temporary fill within Waters of the State¹⁸ associated with construction activities including construction access and streambed disturbance. These temporary impacts are expected to be of short duration and would be restored to pre-project or equivalent conditions upon completion of construction, as feasible.

Permanent impacts are anticipated to total approximately 0.02 acres of Waters of the U.S. and approximately 0.19 acres of Waters of the State and includes placement of approximately 180 cubic yards of permanent fill within Waters of the U.S. and approximately 468 cubic yards of permanent fill within Waters of the State, resulting from placement of the proposed concrete walls/engineered backfill and riprap for erosion protection. These permanent impacts reflect the long-term conversion of jurisdictional features within the modified project site.

In addition, construction could result in indirect impacts on habitat, such as increased sedimentation

¹⁸ Temporary and permanent impacts to Waters of the State includes impacts within three jurisdictional areas: (1) the ordinary high-water mark, (2) stream top of bank, and (3) riparian habitat above top of bank. Waters of the U.S. impacts are included in waters of the State impact totals.

and degradation of water quality. As discussed in Section 6.2: Hydrology and Water Quality, the modified project would comply with municipal stormwater requirements under the Municipal Regional National Pollutant Discharge Elimination System Permit, implemented locally through the San Mateo Countywide Water Pollution Prevention Program, by implementing construction best management practices to control erosion, sediment, and pollutant discharges.

The modified project would also implement SFPUC Standard Construction Measures #3 (Water Quality) and #6 (Hazardous Materials), which include erosion and sediment control measures and proper handling and containment of hazardous materials. Consistent with the approved project, Mitigation Measure M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat) and Mitigation Measure M-BI-2a (Vegetation Restoration Plan) would be implemented for the modified project, which would require installation of fencing around the boundary for construction to minimize impacts to riparian habitat and jurisdictional waters as well as the preparation of a Vegetation Restoration Plan, which would detail requirements for minimizing invasive weeds and restoring all temporarily disturbed areas. Therefore, impacts on jurisdictional waters and wetlands would be **less than significant with mitigation**, and the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to jurisdictional waters and wetlands.

Wildlife Movement, Migration Corridor, and Habitat Connectivity

Similar to the approved project, the modified project is located within the San Mateo Creek corridor, which provides a movement corridor for wildlife species, including special-status amphibians and reptiles. Construction activities within the corridor could result in temporary disturbance of wildlife movement due to noise, vibration, and increased human presence. However, these effects would be short term and limited to the brief duration of construction. The modified project would not result in permanent barriers to movement or long-term fragmentation of habitat, and the overall function of the creek corridor as a movement pathway would be maintained following construction.

Therefore, similar to the approved project, the modified project would not substantially interfere with wildlife movement, migration corridors, or habitat connectivity. Impacts would be **less than significant**, and the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to wildlife movement and habitat connectivity.

Local Policies and Ordinances Protecting Biological Resources

Similar to the approved project, the modified project would not conflict with applicable local policies or ordinances protecting biological resources, including tree protection requirements. As identified in the arborist report,¹⁹ trees present within the modified project area consist of native riparian species associated with the San Mateo Creek corridor. Construction of the modified project would require removal of approximately 20 to 30 trees with a diameter at breast height (DBH) of 4 inches or greater within the project work area to accommodate access, excavation, and installation of erosion repair features. Several inventoried trees within the modified project site meet the Town of Hillsborough and/or

¹⁹ Panorama Environmental, Inc., *Arborist Report, Sunset Supply Pipeline Erosion Repair Project*, June 2026.

San Mateo County criteria for protected trees based on species and trunk diameter described below.^{20,21} Tree removal would be limited to those trees that directly conflict with construction activities.

The Town of Hillsborough identifies trees more than 18 inches in diameter at breast height as protected. San Mateo County identifies trees that are more than 12.1 inches in diameter at breast height, as protected and also protects various indigenous trees at certain minimum trunk diameters, as well as communities of trees (defined as a group of five or more indigenous trees on one parcel of the same species and greater than 6 inches in diameter). Consistent with the approved project, the modified project would comply with local tree protection ordinances, as applicable, and would implement Mitigation Measures M-BI-5a (Replacement of Trees to be Removed) and M-BI-5b (Protection of Trees to be Retained).

Therefore, similar to the approved project, the modified project would not conflict with local policies or ordinances protecting biological resources. Impacts would be **less than significant with mitigation**, and the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to local policies and ordinances protecting biological resources.

6.1.3 Cumulative Impacts

The FEIR concluded that construction of the approved project could result in cumulatively considerable impacts on biological resources due to the project's 19-mile alignment traversing a variety of habitats, including areas supporting special-status species and sensitive natural communities. The FEIR determined that implementation of mitigation measures, including Mitigation Measure M-CBI-I (Snake and Frog Exclusion Fencing Below Crystal Springs Dam), would reduce the approved project's contribution to cumulative impacts to less-than-significant levels.

As discussed above, the modified project is not located within the boundaries of an adopted habitat conservation plan or natural community conservation plan and would therefore not contribute to a cumulative impact related to conflicts with such plans (**no impact**).

The Meadowood Estates Subdivision cumulative project, an approximately 21-acre subdivision project, would involve vegetation removal, grading, and construction activities within and adjacent to the San Mateo Creek corridor. Construction of the modified project, in combination with the Meadowood Estates Subdivision cumulative project, could result in a potentially significant cumulative impact if activities occur concurrently and increase the extent or duration of disturbance within the San Mateo Creek corridor. Overlapping construction could result in increased noise, vibration, vegetation removal, and human presence, which could temporarily affect wildlife movement, nesting behavior, and use of riparian habitat. However, as discussed above, the modified project would implement Mitigation Measures M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat), M-BI-1b (Environmental Awareness Training), M-BI-2a (Vegetation Restoration Plan), M-BI-3a (Protection of San Mateo Woolly Sunflower-and Franciscan onion), M-BI-3c (Protection of Steelhead), M-BI-3d (Protection of California Red-Legged Frog and Northwestern Pond Turtle), M-BI-3e (Protection of Nesting Birds), M-BI-3f (Protection of Bats), M-BI-5a (Replacement of Trees to be Removed), and M-BI-5b (Protection of Trees to

²⁰ Town of Hillsborough, Code of Ordinances, Title 14 – Trees. Available at: https://library.municode.com/ca/hillsborough/codes/code_of_ordinances. Accessed on May 19, 2026

²¹ San Mateo Code, Tree Ordinance (Ordinance No. 4895). Available at: <https://sanmateocountytrees.org>. Access on May 19, 2026

be Retained), which include preconstruction surveys, establishment of work limits, and avoidance and minimization measures to protect sensitive species and habitats. Adherence to the requirements of these mitigation measures and SFPUC standard construction measures would ensure that the modified project would not materially contribute to combined habitat, species, or other biological resource impacts in the San Mateo Creek Corridor. Mitigation Measure M-CBI-I (Snake and Frog Exclusion Fencing Below Crystal Springs Dam) would not be required for the modified project because unlike the approved project, the modified project does not involve work at Crystal Springs Dam. Therefore, the modified project's contribution to a cumulative biological impact would not be cumulatively considerable (***less than significant with mitigation***). The modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to biological resources.

6.1.4 Mitigation Measures

As discussed above, Mitigation Measure M-BI-2b (Protection of Sensitive Habitats), Mitigation Measure M-BI-3b (Protection of Mission Blue Butterfly and Callippe Silverspot Butterfly), and Mitigation Measure M-CBI-I (Snake and Frog Exclusion Fencing Below Crystal Springs Dam) identified in the FEIR for the approved project would not be required for the modified project. The following mitigation measures identified in the FEIR for the approved project, which have been refined to apply more specifically to the modified project, would be implemented to reduce impacts related to jurisdictional waters, special-status species, and trees:

Mitigation Measure M-BI-1a: Protection of Jurisdictional Waters and Riparian Habitat

The SFPUC shall minimize impacts by avoiding watercourses and riparian habitat where feasible. ~~The SFPUC shall require its construction contractor to avoid entirely the adjacent riparian habitat at Sites 1 through 3, and 9 and CP Sites CP 2, CP 3, and CP 15. At Sites 4 through 8 and 10, the impacts shall be confined to the minimum required for construction.~~ The construction contractor shall install temporary fencing to demarcate the boundary for construction ~~at these sites~~. The SFPUC shall mitigate impacts on jurisdictional waters through a combination of on-site compensation areas as necessary. The SFPUC shall select compensation sites that ensure no net loss of jurisdictional waters, in consultation with jurisdictional resource agencies.

Mitigation Measure M-BI-1b: Environmental Awareness Training

Before any construction activities begin, workers shall attend an environmental awareness training session developed by a qualified biologist for all construction personnel. The Environmental Awareness training shall describe locations of jurisdictional waters and riparian habitat and inform personnel of the value of these habitats. The Environmental Awareness training also shall address the potential presence special-status plant and animal species, the species' sensitivity to human activities, and the legal protection afforded to them. It will include information on the adverse effects of invasive weeds and the control measures that must be implemented.

The Environmental Awareness training also shall address the penalties for violating these legal

protections, their responsibilities, applicable mitigation measures, and the roles and authority of the qualified biologist. If non-English-speaking workers will be on site, the construction contractor shall provide interpreters. Each worker shall be presented with an illustrated fact sheet and shall be responsible for complying with the guidelines as set forth therein. Any new workers coming onto the site shall first have to undergo such training. Participants shall be required to sign a form acknowledging their attendance and understanding of the materials presented.

Mitigation Measure M-BI-2a: Vegetation Restoration Plan

The SFPUC shall prepare a vegetation restoration plan with detailed specifications for minimizing invasive weeds and restoring all temporarily disturbed areas and shall ensure that the Plan is successfully implemented by the contractor. The vegetation restoration plan shall be prepared by a restoration specialist familiar with growing requirements of native plant species. The plan shall be provided to the CDFWG, and RWQCB during the permitting process. Therefore, the restoration measures are subject to modification by permitting agencies in the exercise of their oversight responsibilities. Described below are the invasive weed control measures, minimum restoration measures, and success criteria that must be included in the Vegetation Restoration Plan.

To control invasive weeds, SFPUC shall incorporate the following measures into the construction plans and specifications for work:

1. Construction equipment shall arrive at the project clean and free of soil, seed, and plant parts to reduce the likelihood of introducing new weed species.
2. Any imported fill material, soil amendments, gravel, etc., required for construction and/or restoration activities that would be placed within the upper 12 inches of the ground surface shall be free of vegetation and plant material.
3. Certified, weed-free, imported erosion-control materials (or rice straw in upland areas) shall be used exclusively, as applicable (this measure concerns biological material and does not preclude the use of silt fences, etc.).
4. The environmental awareness training program for construction personnel shall include an orientation regarding the importance of preventing the spread of invasive weeds.
5. To reduce the movement of invasive weeds, the contractor shall stockpile topsoil removed during excavation of trenches or test pits, which shall be subsequently replaced during reestablishment of disturbed project areas.
6. Implementation of these measures during construction and site restoration shall be verified by a biological monitor or other onsite inspector.

In order to restore these areas, SFPUC shall implement the following:

1. Restoration shall include re-establishment of original natural contours.
2. At areas to be disturbed temporarily and where native plant species predominate, remove and store topsoil. Replace topsoil when construction is complete.

3. For grassland vegetation areas, reseed the affected areas with a noninvasive native ~~and naturalized~~ grass and forb seed mix.
4. For other plant communities, replant the affected areas with similar plants.
5. All grassland, scrub, woodland, or riparian areas not permanently disturbed shall be restored to their baseline conditions. Percent cover and vegetation composition (other than non-native annual grassland) shall have a variation of no more than 30 percent from the baseline cover and composition condition.
6. Restored areas shall be monitored at least annually for at least 3 years or greater, as determined in consultation with applicable permitting agencies and/or as needed to verify whether the vegetation is fully established and self-sustaining.
7. If full maturity of slow-growing vegetation will take longer than 3 years, such species shall be fully established and self-sustaining to meet the criteria, and the monitoring period shall be extended accordingly to verify whether the vegetation is fully established and self-sustaining.
8. Restoration areas shall be monitored for invasive plants annually in the first 3 years following replanting. If invasive plants are found during the 3-year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria.
9. Alternatively, if success criteria cannot be met at the end of 3 years, the SFPUC may explore alternative mitigation options, such as offsite compensation or mitigation credits, with the applicable resource agencies.

Mitigation Measure M-BI-3a: Protection of San Mateo Woolly Sunflower, ~~Crystal Springs lessingia~~, and Franciscan onion, and San Francisco Collinsia

All occurrences of San Mateo woolly sunflower, ~~and Crystal Springs lessingia~~ shall be avoided. To the greatest extent feasible, occurrences of and Franciscan onion shall be avoided. These plants shall be protected with a suitable temporary barrier. A qualified biological monitor shall be present during installation of the barrier. The biological monitor shall also regularly inspect the integrity of the barrier and notify appropriate personnel if repairs are needed. A barrier will be installed to protect populations of San Mateo woolly sunflower, ~~Crystal Springs lessingia~~, and Franciscan onion located along ~~Crystal Springs and Polhemus Roads~~ the modified project access road, where project-related construction vehicle traffic will occur. ~~For San Francisco Collinsia which cannot be avoided, and for the unavoidable occurrences of Franciscan onion, salvage of plants or seed shall be implemented. The plants and/or seeds shall be incorporated into site restoration, described in Mitigation Measure M-BI-2a, Vegetation Restoration Plan.~~

Mitigation Measure M-BI-3c: Protection of Steelhead

The following measures shall be implemented to avoid and minimize impacts on steelhead at Sites 5 and 10:

1. Seasonal work windows will be implemented to reduce the likelihood of adverse effects on migrating and spawning juvenile and adult steelhead. In-stream construction, including

streambank and channel bed construction, shall be limited to the low-precipitation period (June 1 through October ~~15~~31). By limiting construction to this period, SFPUC shall avoid the potential for adverse effects during the primary migration and spawning season for adults, the primary egg incubation season, and the primary emigration season for juveniles. In-stream construction shall occur during the designated in-water work window between June 1 and October ~~15~~31, unless modified by written agreement with NMFS. (Construction could occur in May during a dry year, but any in-stream work before June 1 would be subject to approval by jurisdictional agencies, who must make a determination that impacts would not occur with earlier construction.)

2. To ensure adequate site restoration, temporary fill, including cofferdams and access ramps, shall be completely removed following completion of construction activities, and the stream channel and construction zone (including riparian habitat) shall be restored to pre-construction conditions to the maximum extent feasible.
3. To reduce turbidity, sedimentation, and other water quality impacts in San Mateo Creek during construction activities (primarily in-stream excavation and cofferdam installation), the SFPUC or their contractor(s) shall:
 - a. Monitor periods of construction activity and coordinate with the contractor to identify periods when localized increases in turbidity may occur.
 - b. Install a silt curtain or other sedimentation control measures to trap sediment and prevent sediment and silt load increases to waterways during in-stream project construction.
 - c. Not cause visible oil, grease, or foam in the work area or downstream.
 - d. Ensure project in-stream construction activities do not cause turbidity increases in surface waters over 15 nephelometric turbidity units (NTUs) over background turbidity as measured in surface waters 300 feet downstream from the working area.
 - e. In the event that project construction activities create a visible plume in surface waters, initiate monitoring of turbidity levels at the discharge site and 300 feet downstream, taking grab samples for analysis of NTU levels twice per day during the work period while the visible plume persists and initiate corrective actions to reduce turbidity in the event of exceedances.
4. Avoidance and minimization measures shall be implemented by the SFPUC or their contractor(s) to the extent practicable during project construction activities and shall include:
 - a. The discharge of petroleum products or other excavated materials to surface waters shall be prohibited.
 - b. Project construction activities shall minimize substrate disturbance.
 - c. The ~~SWPPP~~ SFPUC will include measures for the storage of hazardous materials and protocol for addressing accidental spills, in compliance with SFPUC Standard Construction Measure #6.

5. The SFPUC shall conduct a fish rescue and relocation effort to minimize the effects of in-stream construction activities on steelhead and other aquatic species. The SFPUC shall ensure that a qualified biologist, with a current CDFWG scientific collections permit (SCP) and NMFS approval, conducts the fish rescue and relocation effort to rescue and relocate fish from areas isolated for dewatering. The fish rescue effort shall be implemented during the dewatering of the in-stream construction area. At a minimum, the fish rescue and relocation shall include the following measures:
 - a. Installation and removal of all temporary dewatering infrastructure shall be conducted under the guidance and supervision of a biologist with a current CDFWG SCP to avoid injuring or killing aquatic species within the work area.
 - b. Prior to dewatering the in-stream construction zone, a qualified biologist shall use NMFS-approved methods to relocate aquatic species to suitable habitat downstream of the construction zone.
 - c. Initial dewatering shall be conducted under supervision of a qualified biologist to reduce potential injury or mortality to juvenile steelhead and other aquatic species from stranding.
 - d. Dewatering intakes shall be screened with mesh in accordance with NMFS fish screening criteria for anadromous salmonids (NMFS, 1997) to prevent entrainment of steelhead.

Mitigation Measure M-BI-3d: Protection of California Red-legged Frog and Northwestern Pond Turtle ~~San Francisco Garter Snake~~

During construction work ~~at Sites 1 through 10, El Sites E 1 through E 3, CP Sites CP 1 through CP 5, and staging areas S 2 through S 4 and S 7,~~ the SFPUC shall implement the following measures, which are consistent with the USFWS programmatic consultation specific to the CRLF (USFWS, 1999b).

1. A qualified biologist shall survey the work site two weeks before the start of any construction-related activities. If frog adults, tadpoles, or eggs are found, SFPUC shall contact the USFWS to determine whether relocating any life stages is appropriate. If adult CRLF are present, the construction contractor shall allow the qualified biologist reasonable time to safely collect and move them from the work site before work activities begin. Only with suitable permission from USFWS may qualified biologists capture, handle, and relocate CRLF. ~~SFGS shall be allowed to leave the area without interference.~~
2. Prior to initiation of ground-disturbing activities within 150 feet of suitable aquatic habitat (i.e., San Mateo Creek), a qualified biologist shall conduct a survey for northwestern pond turtle. Surveys shall be conducted two weeks prior to construction and repeated 48 hours prior to ground disturbance. If no individuals are observed, construction may proceed with implementation of all other applicable mitigation measures.

- a. If a northwestern pond turtle is observed within the active work area, work shall halt immediately within a minimum 50-foot radius of the individual and the turtle shall be allowed to move out of the work area voluntarily, if feasible.
 - b. If the individual does not leave the work area, a qualified biologist may relocate the northwestern pond turtle (NWPT) to suitable nearby habitat. Relocation shall occur in accordance with CDFW and USFWS, as appropriate.
3. A qualified biologist shall be present at the work site until the site is determined clear of CRLF/~~NWPT~~SFGS and ground disturbance activities are complete. The SFPUC shall then designate a person (the biological monitor) to inspect on-site compliance with all minimization measures. The qualified biologist shall ensure that the biological monitor receives the training outlined above and training in the identification of CRLF/~~NWPT~~SFGS. In coordination with the project engineer, the biological monitor and the qualified biologist shall have the authority to halt any action that might result in impacts on the species.
4. During project activities, all trash that may attract predators or hide CRLF/~~NWPT~~SFGS shall be properly contained and removed from the work site daily. Following construction, the construction contractor shall remove all trash and construction debris from work areas.
5. The access road, staging area ~~number of access routes, use of staging areas,~~ and the total area of the activity shall be limited to the minimum necessary ~~at each site~~ to complete construction and; shall be delimited on the project drawings before work begins. The routes and boundaries shall be outside riparian and wetland areas to greatest extent feasible.
6. Before work begins, including staging of equipment and supplies, the qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area as deemed necessary by the qualified biologist to prevent CRLF/~~NWPT~~SFGS or other animals from entering the work area. The construction contractor shall install fencing with a minimum height of 3 feet with buried footing or sealed tightly to the ~~pavement~~ ground surface to prevent CRLF/~~NWPT~~SFGS from crawling under and entering the site. After supervising fence installation, the qualified biologist shall conduct a pre-construction survey of the work area. The biological monitor shall inspect the exclusion fencing periodically to confirm proper maintenance. The construction contractor shall confine all equipment and construction operations to the defined work areas.

Mitigation Measure M-BI-3e: Protection of Nesting Birds

~~For construction at Sites 1 through 3, 5 through 7, 9 through 16, 18, and Staging Areas S-1 through S-5, and S-7, The~~ SFPUC shall avoid loss of active nests and potential mortality of special-status and non-special-status migratory birds by implementing the following measures:

1. For raptors, if construction activity begins during the breeding season (~~March~~ February 1 to August 31~~0~~), a preconstruction survey for nests and nesting birds shall be conducted within 2 weeks prior to initiation of construction activities. The survey shall be conducted by qualified biologists (i.e., biologists with experience conducting nesting bird surveys)

and shall cover all forest, woodland, and scrub habitats in the construction limits and all suitable habitats within 250 feet of the construction limits, access permitting. Because construction at each site may occur at different times, surveys shall be conducted in each individual construction area according to the schedule described above. Additionally, if there are any breaks in construction activity at any site for 2 weeks or more, surveys must be conducted again in adjacent habitats to ensure that no active nests or nesting birds have taken residence adjacent to project sites. If no active nests are detected during surveys, then no additional mitigation is required. If an active raptor nest is located, work activities will be delayed within a distance agreed upon in consultation with CDFWG taking into account the habitat surrounding the nest, typical limits are within 250 feet of the nest location until avoidance measures have been implemented. Appropriate avoidance measures shall include the following (however, other equally effective measures may be developed in consultation with the CDFWG):

- a. If it is determined that construction and maintenance activities will not affect an active nest, activities may proceed without restriction.
 - b. A no-disturbance buffer will be established around the nest location to avoid disturbance or destruction of the nest site until after the breeding season or after a qualified wildlife biologist determines that the young have fledged.
 - c. The extent of no-disturbance buffers will be determined by a qualified wildlife biologist in consultation with the applicable resource agencies (i.e., USFWS and/or CDFWG) and will depend on the level of noise or disturbance, line of sight between the nest and the disturbance, ambient levels of noise and other disturbances, and other topographical or artificial barriers.
 - d. If construction activities begin prior to the breeding season (between September 1 and ~~January 31~~February 28), then construction may proceed without mitigation for nesting raptors. However, to qualify, construction activities in this instance would be those that will remain in full force. A minor activity that initiates construction but does not involve the full force of construction activities shall not qualify as “pre-existing construction.” If any raptors nest in the vicinity of the project under a pre-existing construction condition, then it is assumed that they are or will habituate to the construction activities. Under this scenario, the pre-construction survey shall still be conducted on or after ~~March~~ February 1 to identify any active nests in the vicinity, and active sites shall be monitored by a wildlife biologist periodically until after the breeding season or after the young have fledged (usually late June to mid-July). If active nests are identified on or immediately adjacent to the project site, then all non-essential construction activities (e.g., equipment storage, meetings) shall be avoided in the immediate vicinity of the nest site; however, construction activities may proceed.
2. For other nesting birds protected by the MBTA, a pre-construction survey to identify active nests will be conducted by a qualified biologist no more than two weeks before the start of construction from February 1 through August ~~31~~15. Pre-construction surveys for active nests will be conducted within 50 feet of the work areas and the nest locations will be mapped, to the extent allowed by access. If pre-construction surveys indicate an

active nest within 50 feet of the project, a determination will be made by a qualified biologist, in consultation with the CDFWG, as to whether construction work will affect the active nest. If it is determined that construction will not affect an active nest, construction will proceed without any restriction or mitigation measure. If it is determined that construction will affect an active nest, then avoidance is the only mitigation available. Construction will be delayed within 50 feet of such a nest until a qualified biologist determines that the subject bird species of concern are not nesting, unless in consultation with the CDFWG, a determination is made that construction work would not affect the active nest. If there is a break of at least five days in construction activities during the nesting season, an additional nesting bird survey shall be conducted to ensure that no birds have occupied nests during the break in construction activities.

Mitigation Measure M-BI-3f: Protection of Bats

~~Of~~ For trees to be removed ~~at Sites 1 through 10~~, a qualified biologist shall identify those having the potential to be day or maternity roosts for ~~the six special status~~ bat species that might occur within the modified project area.

To minimize impacts on roosting bats to the greatest extent feasible, SFPUC first shall identify trees that might be potential day or maternity roosts, and then shall attempt to drive bats from those trees prior to their removal. At least one week prior to tree removal, a qualified biologist (i.e., familiar with identification of bats and signs of bats) will survey the trees to be removed for roosting bats. The biologist will thoroughly search trees or snags that provide appropriate roosting habitat (trees with foliage, cavities, or that are hollow) for bats or evidence of bats. If no roosting bats or evidence of bats are found, removal of trees may proceed. If bats are found or evidence of use by bats is present, the following procedures shall be implemented before felling the tree:

1. Trees should be removed under the warmest possible conditions. Peel any sections of the exfoliating bark off the tree gently and search for any roosting bats underneath. Create noise and vibrations on the tree itself. Noise and vibrations may include running a chain saw and making shallow cuts in the trunk (where bark has been peeled off) and striking the tree base with fallen limbs or tools such as hammers. Disturbance should be near-continuous for 10 minutes, and then another 10 minutes should pass, before the tree is felled. When cutting sections of the trunk, if any hollows or cavities (such as woodpecker holes) are discovered, be especially careful to check for the presence of bats in those areas. Cut slowly and carefully at all times. If possible, section trunk near cavities to focus noise and vibrations, and open hollows by sectioning off a side.
2. The SFPUC will ensure that the trees are not removed or altered until CDFWG has been contacted for guidance on measures to avoid and minimize disturbance of the bats. Additional measures may include monitoring trees, and excluding bats from a tree until it is removed and/or restricting the timing of tree removal and use of a construction buffer to avoid breeding disturbance of young before they are able to fly (for pallid bats, this period is between April and August).

Mitigation Measure M-BI-5a: Replacement of Trees to be Removed

The following measures shall be implemented for trees to be removed:

1. Where feasible, native trees to be removed that are located ~~within the existing CSPL2 ROW~~ along or adjacent to San Mateo Creek (~~Sites 1 through 10, and E 1 through E 3, where applicable~~) shall be replaced and located within SFPUC ROW according to the SFPUC's Right of Way Integrated Vegetation Management Policy. If it is not feasible to compensate for all native tree removal in SFPUC's ROW in the vicinity of the project, then native tree compensation shall occur at a suitable off-site location.
2. ~~For each removed landscape tree that meets ordinance criteria, the SFPUC shall plant a 24-inch box size replacement tree of similar species at all urban sites (Site 11 through 19, and all remaining EI sites, where applicable). If replanting trees on the same site is infeasible, the SFPUC shall find a suitable alternative location.~~

A qualified biologist shall conduct post-construction monitoring of trees for five years.

Mitigation Measure M-BI-5b: Protection of Trees to be Retained

The following tree protection measures shall be implemented:

1. At sites located along and adjacent to San Mateo Creek, (~~Site 1 through 10, CP 1 through CP 3, E 1 through E 3, S 1 through S 4, S 7, and S 9, as applicable~~) a qualified arborist ~~biologist~~ shall supervise and approve necessary pruning.
2. For trees to be retained ~~at all sites~~ the qualified arborist ~~has~~ shall provide appropriate measures to ensure adequate protection from construction. Measures could include: (1) installing tree protective fencing; (2) pruning low limbs to provide for equipment access and work; (3) providing root buffer zones during the wet season for construction activities encroaching into the tree protection zone (TPZ); (4) prohibiting storage of equipment and materials within root buffer zones or within two feet of the base of any tree; and (5) excavating and pruning roots by hand within TPZ.
3. ~~At project sites located in urban areas (Sites 11 through 19 and all remaining CP, EI, and several staging areas) Where trees are proposed for removal or pruning, a qualified arborist shall review and approve all tree protection measures to be implemented before the start of construction, and also conduct inspections during construction. Post construction, trees subject to root or limb pruning shall be monitored according to the arborist's recommendations. The SFPUC shall make best efforts to retain eucalyptus trees within the Howard-Ralston Eucalyptus Tree~~

6.2 Hydrology and Water Quality

6.2.1 FEIR Summary

The FEIR evaluated the approved project's construction impacts on surface water hydrology, groundwater, flooding, and water quality. The FEIR determined that adverse impacts to water bodies as a result of erosion and sedimentation and hazardous materials release during construction would be

potentially significant. The FEIR also concluded that the approved project would result in potentially significant impacts to surface water quality from construction dewatering discharges and offsite erosion and flooding as a result of permanent alteration of drainage patterns at multiple sites. Implementation of Mitigation Measures M-HY-1a (Construction Water Quality Best Management Practices) and/or M-HZ-1c (Soil and Groundwater Management Plan) would reduce impacts to a less-than-significant level. Where approved project work was proposed in or adjacent to creeks, additional mitigation measures, including Mitigation Measures M-BI-1a (Jurisdictional Waters and Riparian Habitat Protection), M-BI-1b (Environmental Awareness Training), M-BI-2a (Vegetation Protection and Restoration Plan), and/or M-BI-3c (Steelhead Protection Measures) are also required. Furthermore, the FEIR determined that the approved project would not result in significant impacts related to exposing people or structures to significant risk of loss from flooding. The FEIR also concluded that the approved project would have no impact or a less-than-significant impact from depletion of groundwater resources resulting from construction-related dewatering.

6.2.2 Modified Project Analysis

As similar to the approved project, the modified project would involve construction activities within and adjacent to waterways. However, the modified project would occur over a shorter duration and a more limited area than the approved project. Construction of the modified project has the potential to adversely affect surface water quality from construction-related in-channel disturbance and exposure of soils; erosion and sediment transport; and stormwater and/or site runoff containing hazardous materials or other pollutants associated with construction equipment, fuels, and materials.

The modified project would implement SFPUC Standard Construction Measure #3 (Water Quality), which requires compliance with applicable water quality regulations and implementation of best management practices to prevent the discharge of sediment and other pollutants to surface waters during construction. Because the modified project would disturb less than 1 acre, the modified project would not be required to obtain coverage under the State Construction General Permit or prepare a Storm Water Pollution Prevention Plan (SWPPP). However, projects that disturb less than 1 acre within San Mateo County, including within the Town of Hillsborough and any portions of unincorporated San Mateo County, remain subject to municipal stormwater requirements under the Municipal Regional National Pollutant Discharge Elimination System Permit, implemented locally through the San Mateo Countywide Water Pollution Prevention Program, which requires implementation of construction best management practices to control erosion, sediment, and pollutant discharges. Accordingly, the modified project would comply with applicable San Mateo Countywide Water Pollution Prevention Program requirements.

SFPUC Standard Construction Measure #6 (Hazardous Materials) would also be implemented and would require proper handling, storage, and secondary containment of hazardous materials; controlled fueling and equipment maintenance; spill prevention measures; and implementation of spill response procedures to prevent releases to soil or surface waters. The modified project also would comply with applicable permit conditions, including the Clean Water Act section 401 Water Quality Certification, authorizing discharges to waters of the United States and requiring project-specific water quality protections.

Mitigation Measures M-HY-1a (Construction Water Quality Best Management Practices) and Mitigation Measure M-HZ-1c (Soil and Groundwater Management Plan) would not be required for the modified project because SFPUC Standard Construction Measure #3 (Water Quality) and Standard Construction

Measure #6 (Hazardous Materials), in combination with compliance with applicable San Mateo Countywide Water Pollution Prevention Program requirements, require measures equivalent to those outlined in those mitigation measures, respectively. Consistent with the FEIR, where construction activities would occur in or adjacent to San Mateo Creek, Mitigation Measures M-BI-1a (Jurisdictional Waters and Riparian Habitat Protection), M-BI-2a (Vegetation Protection and Restoration Plan), and M-BI-3c (Steelhead Protection Measures) would continue to apply to the modified project. These measures include requirements to limit the extent of disturbance to jurisdictional waters and riparian areas, implement restoration of temporarily disturbed areas following construction, and incorporate species-specific protections during in-water work. These measures address project-specific conditions not fully covered by standard construction requirements. With implementation of SFPUC standard construction measures and FEIR mitigation measures, the modified project's impact on water quality would be ***less than significant with mitigation***.

The modified project would include permanent bank stabilization improvements along the west bank of San Mateo Creek to repair the eroded creek bank and improve long-term bank stability, thereby decreasing the potential for slope instability and bank failure at the modified project site. The modified project would maintain the existing creek alignment and would reduce the potential for bank failure or sediment deposition that could otherwise impair channel function during high-flow events by introducing sediment into the channel. The modified project would also include minor drainage improvements associated with the access road intended to manage existing surface runoff and reduce localized erosion. These improvements would not increase peak flows, alter watershed boundaries, or substantially change downstream drainage patterns. Temporary creek flow bypass during construction would be limited in duration and would not alter floodplain characteristics. Therefore, the modified project would have a ***less-than-significant*** impact related to erosion, drainage, surface runoff, and flooding and would not substantially increase the severity of previously identified significant environmental impacts.

With implementation of the applicable FEIR mitigation measures, SFPUC standard construction measures, and compliance with applicable regulatory requirements, the modified project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified impacts related to hydrology and water quality.

6.2.3 Cumulative Impacts

The FEIR concluded that the approved project's contribution to cumulative impacts related to hydrology and water quality would not be cumulatively considerable with implementation of applicable mitigation measures and that cumulative impacts would be less than significant.

The Meadowood Estates Subdivision cumulative project is within the cumulative geographic scope of the modified project related to hydrology and water quality. The cumulative project would involve ground-disturbing activities that could result in impacts to water quality and result in erosion and surface runoff. The cumulative project would be required to obtain coverage under the State Construction General Permit and prepare a SWPPP, which would include construction best management practices to control erosion, sediment, and pollutant discharges. The cumulative project would also be required to comply with applicable San Mateo Countywide Water Pollution Prevention Program guidelines. The Meadowood Estates Subdivision cumulative project could result in impacts to jurisdictional waters, including wetlands, which could combine with the modified project's disturbance to waters and wetlands resulting

in a potentially significant cumulative impact. The modified project would implement Mitigation Measures M-BI-1a (Jurisdictional Waters and Riparian Habitat Protection), M-BI-2a (Vegetation Protection and Restoration Plan), and M-BI-3c (Steelhead Protection Measures) to limit the extent of disturbance to jurisdictional waters and riparian areas, implement restoration of temporarily disturbed areas following construction, and incorporate species-specific protections during in-water work. Adherence to the requirements of these mitigation measures would minimize the modified project's contribution to combined impacts to jurisdictional waters and water quality. Therefore, the modified project's contribution to a cumulative water quality impact would be not cumulatively considerable (***less than significant with mitigation***). The modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to hydrology and water quality.

6.2.4 Mitigation Measures

Refer to Section 6.1, Biological Resources, for mitigation measures identified in the FEIR for the approved project that would be required for the modified project to address impacts to jurisdictional waters, riparian habitat, and aquatic species. As discussed above, the following mitigation measures identified in the FEIR for the approved project would not be required for the modified project: Mitigation Measures M-HY-1a (Construction Water Quality Best Management Practices) and Mitigation Measure M-HZ-1c (Soil and Groundwater Management Plan).

6.3 Cultural and Tribal Cultural Resources

6.3.1 FEIR Summary

Paleontological Resources

The FEIR evaluated impacts on paleontological resources and determined that the approved project would result in no impacts or less-than-significant impacts on paleontological resources during construction, with the exception of five proposed work sites—Site 11 (Chelmsford Road in Hillsborough), Site 12 (El Camino Real from Millbrae to Burlingame), Site 18 (Main Street, Linda Vista Drive, and Pacific Gas and Electric Company [PG&E] Martin Service Center in Daly City), Site E-7 (El Camino Real and Fairfield Road in Burlingame), and Site E-30 (Geneva Avenue and Allan Street in Daly City)—all of which are located north of Reach 2 of CSPL2, not near the modified project site. The FEIR concluded that impacts at these sites would be potentially significant but would be reduced to a less-than-significant level with implementation of Mitigation Measure M-CP-1 (Accidental Discovery of a Paleontological Resource).

At project sites along San Mateo Creek (e.g. Site 5), impacts to paleontological resources were determined to be less than significant because the modern stream channel deposits associated with San Mateo Creek and Franciscan Complex bedrock have low paleontological potential. Site 4 is also located along San Mateo creek and the FEIR determined there would be no impact to paleontological resources at this location as there would be no ground disturbance at this site.

Archaeological Resources, Human Remains, and Tribal Cultural Resources

The FEIR assessed impacts on archaeological resources and human remains during construction and determined that the approved project could result in potentially significant impacts if such resources

were encountered during ground-disturbing activities. The FEIR also stated that ground-disturbing activities associated with the approved project could encounter previously undiscovered resources of tribal significance. However, with implementation of Mitigation Measures M-CP-2a (Accidental Discovery of Archaeological Resources) and M-CP-3 (Human Remains), the FEIR concluded that impacts on archaeological resources and human remains would be reduced to less than significant.

The FEIR also identified three work sites with increased potential for impacts due to the proximity of previously recorded archaeological resources, including Site 9 (El Cerrito Avenue west of Rockbridge Road in Hillsborough), Site 12 (El Camino Real from Millbrae to Burlingame, Launch Pit 7), and CP-5 (Pepper Avenue near Barroilhet Avenue in Burlingame), all of which are located north of Reach 2 of CSPL2, not near the modified project site. The FEIR determined that potential impacts at these sites would be reduced to a less-than-significant level with implementation of additional mitigation measures, including Mitigation Measures M-CP-2b (Construction Monitoring), M-CP-2c (Extended Archaeological Survey), and M-CP-2d (Archaeological Evaluation Plan and Evaluation Report).

There are no previously recorded archaeological resources at the project sites along San Mateo Creek (i.e., Sites 4 and 5), and impacts on archaeological resources and human remains at these locations were determined to be less than significant with Mitigation Measures M-CP-2a (Accidental Discovery of Archaeological Resources) and M-CP-3 (Human Remains), as identified above.

Historic Resources

The FEIR evaluated impacts on historic resources and determined that the approved project would not result in direct impacts on historic resources through demolition or alteration. CSPL2 was found ineligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) in the FEIR. However, the FEIR determined that construction-related vibration near the Sierra Drive Bridge, located over 1 mile north of the modified project site, could result in potentially significant impacts. Implementation of Mitigation Measure M-CP-6 (Sierra Drive Bridge Vibration Monitoring and Restrictions) would reduce impacts to a less-than-significant level.

6.3.2 Modified Project Analysis

Paleontological Resources

Ground-disturbing activities associated with the modified project would be similar in type to those evaluated in the FEIR but more limited in extent and depth. Construction activities would primarily occur within previously disturbed areas associated with existing pipeline infrastructure and established access roads. Consistent with paleontological resource sensitivity conditions described for Sites 4 and 5 in the FEIR, ground disturbance in the modified project area would occur within geologic units with low paleontological sensitivity, including modern stream deposits and Franciscan Complex bedrock. Accordingly, the potential to encounter paleontological resources would be low, and Mitigation Measure M-CP-1 (Accidental Discovery of a Paleontological Resource) would not be required. Therefore, impacts on paleontological resources would be **less than significant**, and the modified project would not result in new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact.

Archaeological Resources, Human Remains, and Tribal Cultural Resources

On January 16, 2026, a records search was conducted at the Northwest Information Center (NWIC) for the modified project area, encompassing the modified project site and a 0.5-mile radius from the modified

project site boundary. The records search determined that no previously recorded archaeological resources, including Native American archaeological resources, burials, or burial-associated resources, have been documented within or adjacent to the modified project work area. Within the 0.5-mile records search radius, two previously recorded resources, P-41-001910 and P-41-002642, and one informal resource, C-778/C-146, were identified. P-41-001910 is a built environment historic resource discussed in the respective section below. Site P-41-002642 is a Hillsborough Native American reburial site, located approximately 0.2 mile from the modified project site, east of Crystal Springs Road. C-778/C-146 is an informal archaeological resource²² record for San Mateo Shellmound 21, which is described as a small shellmound or possible Native American camping place near San Mateo Creek. The mapped location is estimated to be 1,500 feet from the modified project site, but the resource boundary is considered approximate and not a precise delineation. Additionally, the records search identified 14 prior survey reports in the modified project area. However, review of the spatial data indicates that the prior survey areas do not appear to overlap with the modified project site.

A search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the modified project. The results were negative, indicating that no known tribal cultural resources have been identified within the project area.²³

Ground disturbance for the modified project would occur within the same general corridor evaluated in the FEIR but would be limited to a much smaller area than the approved project. Most excavation would occur in areas previously disturbed by prior utility installation, roadway construction, and maintenance activities, where archaeological sensitivity is low. However, minimal trench excavation, to a depth of approximately 3 feet, would occur within the creek bed for installation of the concrete wall and could extend into native or partially intact creek bed and, consequently, into colluvial or alluvial sediments, which have moderate archaeological sensitivity along San Mateo Creek. These activities could encounter previously undiscovered archaeological resources. The modified project would implement SFPUC Standard Construction Measure #9 (Cultural Resources), Archaeological Measure I (Archaeological Discovery) and Archaeological Measure II (Archaeological Monitoring) for targeted monitoring for wall trenching where excavation extends into the creek bed.²⁴ Archaeological Measure I requires procedures in the event of an unanticipated discovery, including stop-work requirements, evaluation by a qualified archaeologist, and development of appropriate treatment measures, if needed. Archaeological Measure II requires preparation of an Archaeological Monitoring Plan and archaeological monitoring during wall trenching where excavation extends below prior disturbance or engineered fill into native or partially intact creek-bank, colluvial, or alluvial sediments within the bed of San Mateo Creek. This standard construction measure also includes procedures consistent with California Health and Safety Code section 7050.5 and Public Resources Code section 5097.98 to address the accidental discovery of human remains.

²² An informal resource (or informally recorded resource) is a cultural, historical, or archaeological site mentioned in a technical report but lacks official documentation.

²³ As defined in Public Resources Code section 21074, a tribal cultural resource is a site, feature, place, cultural landscape (geographically defined in terms of the size and scope of the landscape), sacred place, or object with cultural value to a California Native American tribe that meets one or more of the following criteria: a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or b) Determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

²⁴ San Francisco Planning Department, Cultural Resources Review Log (internal file), Sunset Supply Erosion Repair Project, 2005.0963ENV-05, May 29, 2026.

If a historic or unique archaeological resource would be adversely affected, Standard Construction Measure #9 (Cultural Resources), Archaeological Measure III (Testing/Data Recovery) would be implemented.

The FEIR mitigation measures would not be required for the modified project because the SFPUC Standard Construction Measure #9 (Cultural Resources), Archaeological Measure I (Archaeological Discovery) and Archaeological Measure II (Archaeological Monitoring) would be implemented and require equivalent procedures to those outlined in Mitigation Measures M-CP-2a (Accidental Discovery of Archaeological Resources), M-CP-2b (Conduct Archaeological Monitoring in Accordance with an Approved Archaeological Monitoring Plan), M-CP-2c (Prepare and Comply with an Archaeological Evaluation Plan and Evaluation Report), M-CP-2d (Archaeological Evaluation Plan and Evaluation Report) and M-CP-3 (Human Remains) for the accidental discovery and treatment of buried cultural resources and human remains and monitoring for sensitive areas. If a potential archaeological resource is encountered during construction, additional measures (e.g., monitoring or data recovery) may be implemented, as appropriate, consistent with SFPUC Standard Construction Measure #9 (Cultural Resources). With implementation of Standard Construction Measure #9, impacts would be **less than significant** and the modified project would not result in new significant impacts related to archaeological resources, human remains, or tribal cultural resources.

Historic Resources

Because the SSPL was identified as a potentially eligible historic-age resource within the modified project site and was not evaluated in the FEIR, an evaluation of SSPL^{25,26} was prepared for the modified project to determine SSPL's eligibility as a historic resource under CEQA and Section 106 of the National Historic Preservation Act. The SSPL was determined to be ineligible for listing in the NRHP or CRHR and is, therefore, not considered a historical resource under CEQA.

Similar to the approved project, construction activities could involve equipment that generates groundborne vibration; however, vibration-intensive construction methods, such as impact or vibratory pile driving, would not be used. Furthermore, no historical resources are present within or adjacent to the modified project area that could be adversely affected by construction-related vibration. The closest built environment historic resource is P-41-001910, the historic Guignecourt property (estate) at 891 Crystal Springs Road in Hillsborough, approximately 0.45 mile east of the modified project site. The modified project would not involve work on or adjacent to Sierra Drive Bridge; therefore, Mitigation Measure M-CP-6 (Sierra Drive Bridge Vibration Monitoring and Restrictions) would not apply to the modified project. Therefore, the modified project would not involve demolition, alteration, or direct or indirect physical impacts on any known historic resources. Accordingly, impacts on historic resources would be **less than significant**, and no project-specific mitigation measures would be required. The modified project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified impacts on historical resources.

²⁵ ICF, Department of Parks and Recreation 523 Series Form for the Sunset Supply Pipeline, July 2026

²⁶ Justin Greving, Senior Preservation Planner, San Francisco Planning Department, Memorandum to File Re: Historic Resource Status of the Sunset Supply Pipeline (2005.0963ENV-04), May 18, 2026

6.3.3 Cumulative Impacts

The FEIR determined that although construction of the approved project had the potential to result in significant impacts on paleontological resources, archaeological resources, historic resources, and human remains, implementation of mitigation measures would reduce the approved project's contribution to cumulative impacts to less than cumulatively considerable.

The EIR for the adjacent Meadowood Estate Subdivision cumulative project determined that potentially significant impacts to unknown paleontological resources could occur from project-related ground disturbance, which would entail an estimated 24,000 cubic yards of excavation. The modified project, however, would result in minimal excavation in an area of low paleontological sensitivity. Additionally, the geographic scope of impacts on a unique paleontological resource is generally localized and site-specific, encompassing the project site and immediate vicinity, and the ground-disturbing components of the modified project would not overlap with the construction footprint of the Meadowood Estate Subdivision cumulative project. For these reasons, the modified project would not contribute to a potentially significant cumulative impact on paleontological resources and the impact would be **less than significant**.

Archaeological resources, tribal cultural resources, and human remains impacts are inherently site-specific and depend on subsurface conditions at each project site. Construction of the modified project and the adjacent Meadowood Estate Subdivision project would have the potential to encounter previously undiscovered archaeological resources, tribal cultural resources, and human remains. Therefore, the cumulative impact would be potentially significant. The modified project would implement SFPUC Standard Construction Measure #9 (Cultural Resources), Archaeological Measure I (Archaeological Discovery) and Archaeological Measure II (Archaeological Monitoring), which establish procedures for the accidental discovery, evaluation, and treatment of archaeological resources, tribal cultural resources, and human remains and require targeted monitoring for wall trenching where excavation extends into native or partially intact creek-bank, colluvial, or alluvial sediments within the creek bed. Additionally, the modified project would result in minimal excavation associated with installation of the concrete wall and embankment placement in comparison with the cumulative project, which would require an estimated 24,000 cubic yards of cut. Because of the modified project's limited amount of excavation and with implementation of Standard Construction Measure #9 (Cultural Resources), Archaeological Measure I and Archaeological Measure II, the modified project's contribution to cumulative impacts on archaeological resources, tribal cultural resources, and human remains would be less than cumulatively considerable (**less than significant**).

With respect to historic resources, the modified project would not involve demolition, alteration, or direct or indirect physical impacts on any known historic resources. Because the modified project would not impact historic resources, it would not combine with cumulative projects to result in a potentially significant cumulative impact (**no impact**).

Therefore, the modified project would not result in new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts on paleontological resources, archaeological resources, tribal cultural resources, historic resources, or human remains.

6.3.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required for the modified project. These measures are: Mitigation Measure M-CP-1 (Accidental

Discovery of a Paleontological Resource), Mitigation Measures M-CP-2a (Accidental Discovery of Archaeological Resources), M-CP-2b (Construction Monitoring), M-CP-2c (Extended Archaeological Survey), and M-CP-2d (Archaeological Evaluation Plan and Evaluation Report), M-CP-3 (Human Remains), and M-CP-6 (Sierra Drive Bridge Vibration Monitoring and Restrictions).

6.4 Noise and Vibration

6.4.1 FEIR Summary

The FEIR evaluated temporary construction-related noise increases, disturbance at schools, consistency with noise ordinance limits, disturbance along construction haul routes, and temporary disturbance due to construction-related vibration. Overall construction noise impacts from the approved project, even with implementation of the required project noise control plan and advance notification measures per the project description from the FEIR, were determined to be significant due to the proximity of receptors to launch pit sites in urban areas and the construction duration. Mitigation Measures M-NO-1 (Supplemental Noise Controls), M-NO-2 (Supplemental Noise Controls at Schools), M-NO-3 (Construction Hours), and M-NO-4 (Helicopter Noise Controls), as identified in the FEIR, were determined to be required for the approved project. Although these measures would reduce the severity of construction noise impacts and could reduce construction noise impacts to less-than-significant levels at some receptors, it was concluded that mitigation measures may not reduce construction noise impacts to less-than-significant levels in all instances and at all receptors; therefore, construction noise impacts were determined to be significant and unavoidable for the approved project.

The FEIR evaluated the potential for vibration-related effects to occur at buildings or structures near approved project construction sites; it was determined that vibration-related damage impacts would be significant at some locations. Specifically, potential impacts were identified at launch pit locations along Sites 12 (El Camino Real from Millbrae to Burlingame) and 18 (Main Street, Linda Vista Drive, and PG&E Martin Service Center in Daly City), where construction with vibration-intensive equipment could occur within 25 feet or less of nearby structures (with some structures located directly adjacent to several launch pits). Mitigation Measures M-NO-5a (Vibration Controls), M-NO-5b (Pre-construction Building Crack Survey), and M-NO-5c (Detailed Geotechnical Review) were applied; it was determined that vibration-related damage impacts would be less than significant with mitigation.

However, at project sites along San Mateo Creek (e.g. Sites 4 and 5), construction noise levels were determined to be less than significant due to the limited equipment needed for construction activities and the distance to sensitive receptors. Similarly, vibration-related impacts were determined to not exceed thresholds for vibration damage to buildings and structures or annoyance.

6.4.2 Modified Project Analysis

Modified project construction would primarily occur during daytime hours and would generally occur during the standard permitted daytime hours for construction in the Town of Hillsborough and in San Mateo County. The modified project would involve similar types of construction equipment, and no new loud or vibration-intensive equipment not previously considered in the FEIR would be required; therefore, equipment-related noise and vibration levels would be comparable to or less than those previously analyzed. Because the modified project site is located approximately 400 feet from the closest nearby receptors, modified project construction is not anticipated to result in noise levels in excess of the

70 dBA speech interference threshold. Accordingly, as identified in the FEIR for Sites 4 and 5, Mitigation Measures M-NO-1a (Noise Control Plan) and M-NO-1b (Noise Control Measures for Sensitive Receptors) would not be required for the modified project because construction noise and vibration would not exceed applicable thresholds at nearby receptors.

Construction noise associated with the modified project would be further minimized through implementation of SFPUC Standard Construction Measure #5 (Noise), which requires compliance with applicable local noise ordinances, restriction of construction activities to permitted hours, proper maintenance and operation of construction equipment, and implementation of best management practices to reduce construction noise.

The modified project would involve construction activities similar in type to those evaluated in the FEIR, including excavation, grading, and concrete placement. The modified project would not include high-vibration construction methods such as impact or vibratory pile driving. Consistent with the FEIR conclusions for Sites 4 and 5, construction-related vibration associated with the modified project would remain below applicable thresholds for structural damage or human annoyance as the closest sensitive receptor to the modified project site is an existing single-family residence located approximately 400 feet from the active work area. Construction noise and vibration impacts associated with the modified project would be ***less than significant***, and no mitigation measures would be required. With the implementation of the SFPUC standard construction measure, the modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to noise and vibration.

6.4.3 Cumulative Impacts

The FEIR concluded that construction of the approved project, in combination with other cumulative projects, could result in potentially significant cumulative construction noise impacts at certain locations along the overall alignment, particularly where construction would occur in close proximity to sensitive receptors and for extended durations, but impacts would be reduced to a less than significant level with implementation of Mitigation Measure M-CNO-1 (Coordinated Noise Control Plan During Construction) At sites along San Mateo Creek, including Sites 4 and 5, cumulative construction noise impacts were determined to be ***less than significant*** due to the type of construction equipment required, the distance to sensitive receptors, and the limited duration of construction activities.

Similar to the approved project, construction of the modified project could occur concurrently with construction of cumulative projects, during which sensitive receptors between the modified project and cumulative project construction sites could be exposed temporarily to greater noise levels. There are no new receptors nor any receptors closer to the modified project site than those previously analyzed in the FEIR.

The Meadowood Estates Subdivision cumulative project could affect the same receptors as the modified project and is located approximately 50 feet from the nearest sensitive receptor to the modified project, therefore a cumulative noise impact has the potential to occur. However, construction noise from the modified project (approximately 400 feet from the receptor) would be substantially reduced due to distance attenuation and would not materially contribute to combined construction noise at the receptor. Therefore, the modified project's contribution to a cumulative noise impact would not be cumulatively considerable (***less than significant***). Mitigation Measure M-CNO-1 (Coordinated Noise

Control Plan During Construction) would not be required because the modified project would not involve work for extended durations.

Cumulative vibration impacts are generally determined by the single vibration source generating the highest PPV at a given receptor. Vibration from multiple construction sites does not combine to increase PPV at a receptor in the same manner as noise. The Meadowood Subdivision project would be within 100 feet of the modified project and within 50 feet of the nearest sensitive receptor. If the cumulative project and modified project construction overlap, vibration impacts at a receptor would be governed by the single source generating the highest peak particle velocity and would not combine in the same manner as noise. Accordingly, vibration from the modified project would not be expected to combine with cumulative projects to exceed thresholds for structural damage or human annoyance, and cumulative vibration impacts would be **less than significant**. Therefore, the modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to noise or vibration.

6.4.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required for the modified project. These measures are Mitigation Measures M-NO-1 (Supplemental Noise Controls), M-NO-2 (Supplemental Noise Controls at Schools), M-NO-3 (Construction Hours), M-NO-4 (Helicopter Noise Controls), Mitigation Measures M-NO-5a (Vibration Controls), M-NO-5b (Pre-construction Building Crack Survey and Remediation), and M-C-NO-1 (Coordinated Noise Control Plan During Construction).

6.5 Air Quality and Greenhouse Gas

6.5.1 FEIR Summary

The FEIR determined that construction of the approved project would generate emissions of criteria air pollutants during construction, resulting in a potentially significant air quality impact. Under the Bay Area Air District's²⁷ (air district's) 1999 and 2010 adopted CEQA guidelines, construction-related fugitive dust emissions from all construction projects were considered potentially significant. Accordingly, the FEIR determined that the approved project would result in potentially significant impacts related to fugitive dust emissions during construction.

These impacts would be reduced to a less-than-significant level with implementation of Mitigation Measure M-AQ-1a (Dust Control Measures), which incorporates air-district-recommended dust control practices, such as watering disturbed areas, stabilizing exposed soils, and covering haul trucks and stockpiles. Potentially significant impacts from construction equipment exhaust emissions were also identified in the FEIR and were determined to be reduced to a less-than-significant level with implementation of Mitigation Measure M-AQ-1b (Exhaust Control Measures), which follows air-district-recommended exhaust control measures, including proper maintenance of construction equipment and minimization of unnecessary idling.

²⁷ On January 22, 2025, the air district formally changed its name from the Bay Area Air Quality Management District to the Bay Area Air District.

The FEIR further concluded that construction of the approved project would result in less-than-significant impacts related to exposure of sensitive receptors to diesel particulate matter (DPM) and odors due to the temporary nature of construction activities and the implementation of applicable mitigation measures.

The FEIR also evaluated greenhouse gas (GHG) emissions associated with construction of the approved project. Construction-related GHG emissions were determined to be temporary and limited to the construction period. Accordingly, no mitigation measures were adopted in the FEIR for GHG emissions.

6.5.2 Modified Project Analysis

Similar to the approved project, the modified project would involve construction activities that would generate fugitive dust, including limited excavation, grading, and transport of soils and backfill, though these activities would be reduced in scope compared to the approved project.

Construction of the modified project would generate temporary emissions of criteria air pollutants, including reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter (PM₁₀ and PM_{2.5}), from operation of off-road construction equipment and construction-related vehicle trips. Combustion emissions from operation of heavy equipment and haul trucks, as well as worker commute vehicles, would result in emissions of ROG and NO_x, which are ozone precursors. The scope of the modified project would be substantially reduced relative to the approved project, because it would have a much smaller construction footprint, fewer hours of equipment use, and a much shorter construction duration relative to the approved project. The construction-related criteria air pollutant emissions were modeled for the modified project²⁸ and, as summarized in Table 6-2, the modified project would not exceed the air district's applicable CEQA significance thresholds for construction emissions. Therefore, impacts related to criteria air pollutant emissions associated with the modified project would be **less than significant**, and Mitigation Measure M-AQ-1b (Exhaust Control Measures) would not be required for the modified project.

²⁸ SFPUC Air Quality Screening Tool, v.6 - Phase 1 (Area Projects) for the Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek, April 28, 2026

Table 6-2: Estimated Project Criteria Pollutant Emissions

Criteria Air Pollutant	Estimated Emissions (lbs./day) ^{1,2}	Air District Thresholds (lbs./day) ³
PM ₁₀	0.59	82
PM _{2.5}	0.54	54
NO _x	13.72	54
ROG	2.05	54

Notes:

1) Criteria emissions include all onsite construction emissions and onroad truck emissions for the full truck trip length of 20 miles. Worker commute trip emissions are excluded as negligible.

2) Daily average emissions are calculated as the quantity of emissions divided by the total number of days for the Project (163 days). Total days are calculated as the total number of calendar days between the Project start date and end date.

3) Bay Area Air District, California Environmental Quality Act Air Quality Guidelines, April 2022

Similar to the approved project, Measure M-AQ-1a (Dust Control Measures), which incorporates air-district-recommended dust control best management practices, would be implemented for the modified project, which would reduce the modified project's potential to generate fugitive dust. These BMPs include regular watering of exposed surfaces, covering haul trucks transporting soils and loose materials, use of wet-power vacuum street sweepers, and maintaining vehicle speeds of 15 miles per hour or less on unpaved surfaces. Therefore, impacts related to fugitive dust emissions associated with the modified project would be **less than significant with mitigation**.

The modified project would expose sensitive receptors to diesel particulate matter from diesel trucks used to transport construction materials and backfill and use of construction equipment. However, the modified project would reasonably result in lower total DPM and toxic air contaminant emissions than those analyzed in the FEIR due to the reduced scale and duration of modified project construction. Because the modified project's construction duration would be limited to approximately 4 to 6 months and the scope of the modified project would be reduced in comparison to the approved project, diesel particulate matter emissions are not expected to expose sensitive receptors to substantial pollutant concentrations and project's impact associated with exposure to diesel particulate matter during construction would be **less than significant**.

The modified project would generate temporary GHG emissions during construction from operation of construction equipment and construction-related vehicle trips. These emissions would be short term and limited in magnitude. Consistent with the FEIR conclusions, impacts related to greenhouse gas emissions associated with the modified project would be **less than significant**. With compliance with applicable regulatory requirements, the modified project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified impacts related to air quality or greenhouse gas emissions.

6.5.3 Cumulative Impacts

The FEIR concluded that, with implementation of mitigation measures, the approved project's contribution to potentially significant cumulative air quality impacts would not be cumulatively considerable.

Regional air pollution generally is considered a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional non-attainment of ambient air quality standards. Instead, a project's individual emissions would contribute to existing cumulative adverse air quality impacts.²⁹ The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to result in a considerable net increase in non-attainment criteria air pollutants. Therefore, cumulative criteria air pollutant analysis is presented above under the modified project analysis.

The proposed project's 160 total truck trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with other nearby sources. The modified project's incremental increase in localized toxic air contaminant emissions resulting from construction vehicle trips would be minor and would not contribute substantially to cumulative toxic air contaminant emissions when combined with that from cumulative projects. Cumulative air quality impacts would be **less than significant**.

GHG emissions are inherently cumulative because individual projects contribute incrementally to the global concentration of GHGs emissions that drive climate change. The FEIR concluded that construction-related GHG emissions associated with the approved project would be temporary and would not conflict with state or local plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the modified project in combination with the cumulative project would not result in a significant cumulative impact on GHG impacts (**less than significant**), and the modified project would not result in any new significant cumulative GHG impacts or substantially increase the severity of previously identified significant cumulative GHG impacts.

6.5.4 Mitigation Measures

As discussed above, Mitigation Measure M-AQ-1b (Exhaust Control Measures) identified in the FEIR for the approved project would not be required for the modified project. The following mitigation measure identified in the FEIR for the approved project, which has been refined to apply more specifically to the modified project, would be implemented for the modified project.

Mitigation Measure M-AQ 1a: Dust Control Measures

The SFPUC shall include the following dust control measures in contract specifications:

1. BAAQMD Basic Control Measures (~~applies to all construction sites~~)
 - All active ~~construction areas~~ grading within the unpaved access road shall be watered at least twice daily.
 - All trucks hauling soil, sand, and other loose debris shall be covered or all trucks shall be required to maintain at least 2 feet of freeboard on public roads.
 - All unpaved access roads, parking areas, and staging areas at construction sites shall ~~either be paved, watered as needed to minimize visible dust three times daily, or~~

²⁹ Bay Area Air Quality Management District. 2022 CEQA Air Quality Guidelines.

~~nontoxic soil stabilizers shall be applied.~~

- All paved access roads, parking areas, and staging areas at construction sites shall be swept daily (with vacuum trucks or dry street sweepers).
- If visible soil material is carried onto adjacent public streets, adjacent streets shall be swept daily (with vacuum trucks or dry street sweepers).

2. ~~BAAQMD Enhanced Control Measures (also applies to sites over four acres)~~

- ~~All inactive construction areas (previously graded areas inactive for 10 days or more) shall be hydroseeded or nontoxic soil stabilizers shall be applied.~~
- ~~Exposed stockpiles (dirt, sand, etc.) shall be enclosed, covered, and watered, or nontoxic soil binders shall be applied.~~
- ~~As feasible, traffic speeds on unpaved roads shall be limited to 15 miles per hour.~~
- ~~Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways.~~
- ~~Disturbed areas shall be replanted as quickly as possible.~~

3. ~~BAAQMD Optional Control Measures (also applies to construction sites that are large in area, located near sensitive receptors, or which for any other reason warrant additional emissions reductions)~~

- ~~Wheel washers shall be installed for all exiting trucks, or all trucks and equipment leaving the site shall be washed off.~~
- ~~Wind breaks or trees/vegetative wind breaks shall be installed at windward side(s) of construction areas.~~
- ~~Excavation and grading activity shall be suspended when winds exceed 25 miles per hour.~~
- ~~The area subject to excavation, grading, and other construction activity at any one time shall be limited.~~

6.6 Traffic, Transportation, and Circulation

6.6.1 FEIR Summary

As discussed under Section 5.3 Updates to CEQA Guidelines, to assess transportation-related impacts resulting from the modified project, this addendum uses VMT instead of traffic delay, which was the impact assessment methodology applied in the FEIR for the approved project. Because construction-related trips are excluded from VMT analysis and operation of the modified project would not generate

any additional daily trips (as discussed in Section 3.3, Operation and Maintenance), the modified project would not result in any VMT-related impacts.

The FEIR determined that road and lane closures required to accommodate construction of the approved project would result in varying levels of adverse impacts, including impaired access to adjacent roadways and land uses and increased safety hazards for vehicles, pedestrians and bicyclists, across the approved project alignment. With the exception of Site 12 (El Camino Real from Millbrae to Burlingame), impacts on impaired access to adjacent roadways and land uses were determined to be less than significant or less than significant with the incorporation of Mitigation Measure M-TR-1a (Traffic Control Plan). Impacts related to reduction in capacity and increased traffic delay at Site 12 were determined to be significant and unavoidable with implementation of Mitigation Measure M-TR-1b (Additional Traffic Control Measures for Site 12 [El Camino Real]). At project sites along San Mateo Creek (i.e., Sites 4 and 5), transportation-related impacts were determined to be less than significant with mitigation.

6.6.2 Modified Project Analysis

Modified project construction activities would be similar or reduced relative to approved project activities along San Mateo Creek. Modified project construction would not require any lane closures on Crystal Springs Road or Tartan Trail Road, and equipment and vehicles would use off-road staging areas such that construction activities would not occur within or adjacent to roadways and would not interfere with traffic flow. Construction would result in a maximum of 10 one-way truck trips per day and 16 one-way worker vehicle trips per day, which would not substantially affect traffic flow in a manner that would result in hazards for vehicles, pedestrians, and cyclists or impair access to roadways and adjacent land uses. The modified project would implement SFPUC's Standard Construction Measure #4 (Traffic), which would require the contractor to implement traffic control measures to maintain traffic, pedestrian, and bicycle circulation including, but not limited to, flaggers on duty to maintain traffic flow. With implementation of SFPUC standard construction measures, construction-related traffic impacts would be **less than significant**. Mitigation Measure M-TR-1a (Traffic Control Plan) would not be required for the modified project because project construction would not occur within roadways and implementation of Standard Construction Measure #4 (Traffic) would ensure that the modified project implements traffic control measures. Mitigation Measure M-TR-1b (Additional Traffic Control Measures for Site 12 [El Camino Real]) would not be required because the modified project does not include any work on El Camino Real. The modified project would not result in any new significant environmental impacts or substantially increase the severity of previously identified significant environmental impacts related to traffic, transportation, and circulation.

6.6.3 Cumulative Impacts

The FEIR concluded that, with implementation of mitigation measures, including Mitigation Measure M-CTR-1 (SFPUC Construction Coordination), the approved project's contribution to traffic, transportation and circulation impacts would be cumulatively significant and unavoidable. The FEIR determined that there are no cumulative impacts resulting from construction work at Sites 4 or 5.

The Meadowood Estates Subdivision cumulative project is within the cumulative geographic scope of the modified project related to traffic, transportation, and circulation as it would result in increased traffic along Crystal Springs Road, Tartan Trail Road, and the entrance to the SFPUC access road during construction. If construction of the Meadowood Estates Subdivision Project overlaps with construction of

the modified project, a significant cumulative impact related to construction traffic could occur. However, the cumulative project would be required to prepare and receive approval on a construction management plan prior to construction activities, as required by the Town of Hillsborough's Municipal Code Chapter 15.26. The plan specifies requirements for submittal of a construction schedule of specific phasing, parking plan provisions, locations for storage of construction materials and equipment, and delivery management. Adherence to the plan would accordingly minimize construction-period traffic impacts. As discussed above, the modified project would implement SFPUC Standard Construction Measure #4 (Traffic), which would require implementation of traffic control measures during construction. Therefore, the modified project, in combination with the Meadowood Estates Subdivision cumulative project, would not result in a significant cumulative impact to traffic, transportation, and circulation (**less than significant**). Mitigation Measure M-CTR-1 (SFPUC Construction Coordination) would not be required for the modified project because no road closures are proposed during construction and no significant cumulative impacts related to traffic, transportation, and circulation are expected.

6.6.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required for the modified project. These measures are Mitigation Measure M-TR-1a (Traffic Control Plan), Mitigation Measure M-TR-1b (Additional Traffic Control Measures for Site 12 [El Camino Real]), and Mitigation Measure M-CTR-1 (SFPUC Construction Coordination).

6.7 Geology and Soils

6.7.1 FEIR Summary

Although the entire CSPL2 alignment lies within a seismically active region and the FEIR identified risks associated with strong ground shaking and liquefaction, the FEIR determined that, with implementation of engineering design standards and standard construction practices, including compliance with applicable building codes and geotechnical recommendations, impacts would be less than significant. The FEIR determined that the approved project would have potentially significant impacts associated with landslide (or slope failure) during construction within areas identified as having increased landslide risk and/or requiring deep excavations, including Site 5 along San Mateo Creek. The impact would be reduced to less than significant with implementation of Mitigation Measure M-GE-1 (Shoring Plan), which requires the development and implementation of a site-specific landslide hazard shoring plan for areas with higher landslide risk.

6.7.2 Modified Project Analysis

The modified project would be constructed in the same seismically active region as the approved project. As with the approved project, the modified project would not involve construction of habitable structures and would not increase exposure of people or structures to seismic hazards. As similar to the approved project, the modified project would result in less-than-significant impacts related to seismic activity, unstable or expansive soils, and unique geologic and physical features. The modified project site is underlain by alluvial materials along San Mateo Creek that are not mapped as having significant landslide susceptibility. Although adjacent hillslopes are mapped as having some landslide history, the

modified project would not involve construction within these slopes. In addition, the modified project proposes bank stabilization activities that would improve slope stability along the creek. Therefore, construction would not result in significant impacts related to landslides or slope failure, and Mitigation Measure M-GE-1 (Shoring Plan) identified in the FEIR for landslide hazards is not required for the modified project. Impacts would be **less than significant**. The modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to geology, soils, and seismicity.

6.7.3 Cumulative Impacts

The FEIR concluded that the geographic scope of potential cumulative geologic and seismic impacts is generally site specific and depends on local geologic and soil conditions, and that the approved project would not contribute to cumulative impacts related to geologic hazards, soil stability, or seismicity. As previously discussed, the modified project would have less-than-significant impacts on geology and soils.

The Meadowood Estates Subdivision cumulative project is within the geographic scope for geology and soils-related cumulative impacts, and is located adjacent to the staging area for the modified project. The Meadowood Estates Subdivision cumulative project would also be required to comply with local ordinances (e.g., Town of Hillsborough Building Code) related to soils, geology, and seismicity. Because the modified project and cumulative project would be required to comply with standard geotechnical and erosion control practices consistent with applicable regulatory requirements, the modified project in combination with the cumulative projects would not result in a significant cumulative impact related to geologic hazards, soil stability, and seismicity (**less than significant**). Therefore, the modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to geology and soils.

6.7.4 Mitigation Measures

As discussed above, Mitigation Measure M-GE-1 (Shoring Plan), which was identified in the FEIR for the approved project, is not required for the modified project.

6.8 Hazards and Hazardous Materials

6.8.1 FEIR Summary

The FEIR determined that the approved project would have the potential to result in significant impacts related to encountering soils or groundwater containing hazardous materials, exposure to naturally occurring asbestos, accidental release of hazardous materials during construction, emissions or use of hazardous materials within 0.25 mile of a school, and interference with an emergency response or evaluation plan. Potential impacts from encountering soils or groundwater contaminated by hazardous materials and impacts to schools within 0.25 mile were determined to be reduced to a less-than-significant level with implementation of Mitigation Measures M-HZ-1a (Preconstruction Hazardous Materials Assessment), M-HZ-1b (Site Health and Safety Plan), M-HZ-1c (Soil and Groundwater Management Plan), M-HZ-1d (Coordination with Property Owners and Regulatory Agencies), M-HZ-1e (Hazardous Materials Investigation and Compliance with Deed Restrictions at PG&E property at Site 18 [PG&E Martin Service Center property]), M-HZ-1f (Dust Monitoring at Site 18), M-HZ-1g (Soil Stockpiles), M-AQ-1a (Dust Control Measures), and M-HY-1a (Construction Water Quality Best Management Practices),

as applicable. Potential impacts from exposure to natural occurring asbestos would be reduced to less than significant with implementation of Mitigation Measure M-HZ-2 (Asbestos Dust Mitigation Plan). Potential impacts related to interference with an emergency response or evacuation plan would be reduced to less-than-significant levels with implementation of Mitigation Measures M-TR-1a (Traffic Control Plan), and M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]). The approved project was determined to result in less-than-significant impacts related to risk of fire and transport, use, or disposal of hazardous materials during construction.

6.8.2 Modified Project Analysis

Modified project construction activities would be similar to or reduced relative to the approved project and would result in less-than-significant impacts related to risk of fire and transport, use, or disposal of hazardous materials during construction. The modified project is not located within 0.25 mile of a school; therefore, impacts to schools from emissions or use of hazardous materials would not occur (**no impact**). The modified project would not require any road or lane closures that could interfere with emergency response or emergency evacuation plans. Therefore, mitigation measures M-TR-1a (Traffic Control Plan) and M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]) would not apply to the modified project.

As similar to the approved project, the modified project would involve excavation; however, the modified project is not located within or adjacent to any hazardous materials sites or areas with known soil or groundwater contamination.³⁰ Therefore, the potential to encounter contaminated materials during construction would be low. During construction, the SFPUC would implement its Standard Construction Measure #6 (Hazardous Materials), which would require an assessment of the modified project's potential to encounter contaminated groundwater or soils; development and implementation of a plan to treat, contain, or remove hazardous materials in accordance with regulatory requirements to avoid adverse exposure to the material; procedures for characterizing, treating, containing, or removing hazardous materials encountered during construction; and best management practices to prevent the release of hazardous materials used during construction. Implementation of these measures would ensure that hazardous materials are properly identified, handled, and disposed of, thereby minimizing potential risks to human health and the environment. Therefore, Mitigation Measures M-HZ-1a (Preconstruction Hazardous Materials Assessment), M-HZ-1b (Site Health and Safety Plan), M-HZ-1c (Soil and Groundwater Management Plan), and M-HZ-1d (Coordination with Property Owners and Regulatory Agencies), identified in the FEIR for the approved project would not be required for the modified project because SFPUC Standard Construction Measure #6 (Hazardous Materials) and compliance with regulatory requirements would be equivalent to the requirements in these mitigation measures. Further, the modified project would not be located within the PG&E Martin Service Center property, a regulatory-agency listed hazardous materials site. Therefore, Mitigation Measures M-HZ-1e (Hazardous Materials Investigation and Compliance with Deed Restrictions at PG&E property for at Site 18 [PG&E Martin Service Center property]), M-HZ-1f (Dust Monitoring at Site 18), and M-HZ-1g (Soil Stockpiles) would not be applicable.

Furthermore, as discussed in Section 6.5, Air Quality and Greenhouse Gas, implementation of Standard Construction Measure #2 (Air Quality) would ensure that the modified project complies with applicable

³⁰ California State Water Resources Control Board (SWRCB), GeoTracker Database (State Water Board environmental data system), <https://geotracker.waterboards.ca.gov>. Accessed April 20, 2026.

dust control regulations, and therefore, Mitigation Measure M-AQ-1a (Dust Control Measures) would not be required for the modified project. Also, as discussed in Section 6.2, Hydrology and Water Quality, implementation of Mitigation Measure M-HY-1a (Construction Water Quality Best Management Practices) would not be required for the modified project because the modified project would comply with the San Mateo Countywide Water Pollution Prevention Program and would implement SFPUC Standard Construction Measure #3 (Water Quality), which requires compliance with applicable water quality regulations and implementation of best management practices to prevent the discharge of sediment and other pollutants to surface waters during construction.

The modified project is not located within an area identified as having naturally occurring asbestos.³¹ Therefore, Mitigation Measure M-HZ-2 (Asbestos Dust Mitigation Plan) would not be applicable to the modified project.

The modified project site is primarily in a State Responsibility Area and is designated as a moderate fire hazard severity zone. In addition, portions of the modified project site's staging area are located within a local responsibility area, also mapped as a moderate fire hazard severity zone.³² Construction activities could temporarily increase the potential for fire ignition from construction equipment. Local and state regulations, including Title 14 of the California Code of Regulations, administered by the California Department of Fire and Forestry (CAL FIRE), the State Strategic Fire Plan, CAL FIRE Wildland Hazards and Building Codes, and the Wildland Urban Interface Program of San Mateo County, govern the use of construction equipment, particularly in fire prone areas, and are designed to minimize the risk of wildland fires. These regulations restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that has an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided for various types of work in fire-prone areas. Additionally, the SFPUC would implement SFPUC Standard Construction Measure #6 (Hazards and Hazardous Materials), which would require fire prevention measures such as proper fuel storage, equipment maintenance, and containment of any combustible materials. With compliance with local and state regulations and the implementation of SFPUC standard construction measures, the modified project would have a **less-than-significant** impact related to wildfire.

With implementation of Standard Construction Measures #2 (Air Quality) and #6 (Hazardous Materials) and compliance with local, state, and federal regulatory requirements, the modified project's impact related to hazardous materials would be **less than significant**. Therefore, the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to hazardous materials.

6.8.3 Cumulative Impacts

The FEIR concluded that the approved project's cumulative impacts to hazards and hazardous materials would be less than significant. As previously discussed, with implementation of SFPUC Standard Construction Measure #6 (Hazardous Materials) and compliance with applicable local, state, and federal regulations, the modified project would have a **less-than-significant** impact related to hazards and hazardous materials. The Meadowood Estates Subdivision cumulative project may involve the handling

³¹ Erskine Environmental Consulting and Baseline Environmental Consulting. (May 2024) Technical Memorandum: 2024 Naturally Occurring Asbestos GIS-Based Likelihood Map.

³² State of California, Office of the State Fire Marshall. (2026). Fire Hazard Severity Zone Viewer.

and transport of contaminated soils and be located within an area containing contaminated soils and groundwater and, therefore, would also have the potential to result in impacts from use of hazardous materials for construction and operation. Because the cumulative project would also be required to comply with applicable regulations to reduce potential hazards and hazardous-materials-related impacts, the modified project in combination with the cumulative project would not result in a significant cumulative impact on hazards and hazardous materials (***less than significant***). Therefore, the modified project would not result in any new significant cumulative impacts or substantially increase the severity of previously identified significant cumulative impacts related to hazards and hazardous materials.

6.8.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required for the modified project. These measures are Mitigation Measures M-HZ-1a (Preconstruction Hazardous Materials Assessment), M-HZ-1b (Site Health and Safety Plan), M-HZ-1c (Soil and Groundwater Management Plan), M-HZ-1d (Coordination with Property Owners and Regulatory Agencies), M-HZ-1e (Hazardous Materials Investigation and Compliance with Deed Restrictions at PG&E property at Site 18 [PG&E Martin Service Center property]), M-HZ-1f (Dust Monitoring at Site 18), M-HZ-1g (Soil Stockpiles), M-AQ-1a (Dust Control Measures), M-HY-1a (Construction Water Quality Best Management Practices), M-HZ-2 (Asbestos Dust Mitigation Plan), M-TR-1a (Traffic Control Plan), and M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]).

6.9 Aesthetics

6.9.1 FEIR Summary

The FEIR evaluated the temporary construction impacts of the approved project on designated scenic vistas and the surrounding visual character and determined that temporary impacts from construction and staging areas along approximately 3 miles of El Camino Real, which is designated as a scenic route by both San Mateo County and the City of Burlingame, would be less than significant with implementation of Mitigation Measure M-AE-1 (Construction Staging and Cleanup). The FEIR also determined that the approved project could result in a potentially significant impact related to use of temporary nighttime lighting and a potentially significant permanent impact on scenic resources due to the removal of trees near San Mateo Creek along Crystal Springs Road, portions of which are designated as a scenic corridor by San Mateo County. These impacts would be reduced to a less-than-significant level with implementation of Mitigation Measure M-AE-2 (Site-Specific Construction Lighting Plan) and Mitigation Measures M-AE-3a (Tree Avoidance), M-AE-3b (Landscaping and Tree Replacement Plan), M-BI-2a (Vegetation Restoration Plan), and M-BI-5a (Tree Replacement).

6.9.2 Modified Project Analysis

The modified project would not require the use of nighttime lighting; therefore, Mitigation Measure M-AE-2 (Site-Specific Construction Lighting Plan) would not apply. The modified project would not require construction within El Camino Real; however, it would involve construction parallel to an approximately 500-foot-long segment of Crystal Springs Road, which is a designated scenic corridor. Although construction activities could occur as close as 25 feet to the west of Crystal Springs Road, due to the dense tree cover along Crystal Springs Road, construction activities are not expected to be visible from

the roadway. Additionally, SFPUC Standard Construction Measure #8 (Visual and Aesthetic Considerations, Project Site) requires that the contractor maintain the modified project site in a clean and orderly state (e.g., storing materials and equipment at designated staging areas and out of public view where feasible) and that construction work are restored to their general pre-project condition following construction. Therefore, Mitigation Measure M-AE-1 (Construction Staging and Cleanup), identified in the FEIR for the approved project, would not be required for the modified project because SFPUC Standard Construction Measure #8 (Visual and Aesthetic Considerations, Project Site) requires measures equivalent to those outlined in Mitigation Measure M-AE-1 (Construction Staging and Cleanup) to address construction-related visual impacts.

The modified project would include the removal of approximately 20 to 30 trees along the west bank of San Mateo Creek. As discussed above, construction activities, including permanent removal of trees, is not expected to be visible from Crystal Springs Road because of the relatively low number of tree removals compared to the overall tree density in the area and because of the presence of dense intervening vegetation obscuring the modified project site from motorists and cyclists along Crystal Springs Road. Therefore, Mitigation Measures M-AE-3a (Tree Avoidance), M-AE-3b (Landscaping and Tree Replacement Plans), M-BI-2a (Vegetation Restoration Plan), and M-BI-5a (Replacement of Trees to be Removed) are not required to reduce aesthetics impacts of the modified project because tree removal would not be visible from Crystal Springs Road and the visual quality of the modified project site and surrounding area from Crystal Springs Road would remain unchanged.³³

Because construction impacts would be temporary and reduced by implementation of Standard Construction Measure #8 (Visual and Aesthetic Considerations) and permanent impacts would result in a negligible change to the visual character due to the intervening trees that screen views of the modified project site from Crystal Springs Road, the modified project's impacts on scenic resources would be **less than significant**. The modified project would not result in any new significant environmental impacts or substantially increase the severity of previously identified significant environmental impacts related to aesthetics.

6.9.3 Cumulative Impacts

The FEIR concluded that the approved project's cumulative impacts to aesthetics would be less than significant at Sites 4 and 5.

The Meadowood Estates Subdivision Project is located off Crystal Springs Road and within the cumulative geographic scope for aesthetics-related impacts. Construction of the modified project could overlap with construction of the cumulative project, which could result in significant temporary impacts to visual character along the scenic corridor from construction equipment and activities. However, as similar to the modified project, construction of the Meadowood Estates Subdivision cumulative project would be temporary and screened by the dense tree along Crystal Springs Road. Therefore, the combined construction activities of the cumulative projects would not result in a significant cumulative aesthetics impact along the designated scenic corridor (**less than significant**).

The modified project would remove approximately 20 to 30 trees; however, long-term visual impacts are not anticipated due to the screening of the site by intervening vegetation between the modified project

³³ Mitigation Measure M-BI-5a (Replacement of Trees to be Removed) is required, however, for impacts related to biological resources.

site and Crystal Springs Road. While the Meadowood Estates Subdivision cumulative project is anticipated to remove 322 trees to allow for future construction of residences and accessory structures, the project is required to comply with the Town of Hillsborough Design Guidelines and Municipal Code sections pertaining to tree replacements, landscaping, and lighting. Therefore, the modified project in combination with the cumulative project would not result in a significant cumulative impact on aesthetics (***less than significant***).

6.9.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required to reduce aesthetics impacts of the modified project. These measures are: Mitigation Measure M-AE-1 (Construction Staging and Cleanup), Mitigation Measure M-AE-2 (Site-Specific Construction Lighting Plan), Mitigation Measure M-AE-3a (Tree Avoidance), Mitigation Measure M-AE-3b (Landscaping and Tree Replacement Plan), Mitigation Measure M-BI-2a (Vegetation Restoration Plan), and Mitigation Measure M-BI-5a (Replacement of Trees to be Removed).³⁴

6.10 Utilities and Service Systems

6.10.1 FEIR Summary

The FEIR determined that the approved project could result in potentially significant impacts related to damage to, temporary disruption of, or permanent relocation of existing utilities. However, with implementation of Mitigation Measures M-UT-1a (Pre-Construction Utility Identification and Notification), M-UT-1b (Protection of Other Utilities during Construction), M-UT-1c (Advance Notification), and M-UT-1d (Emergency Response Plan and Notification), impacts would be reduced to a less-than-significant level. The FEIR also determined that the approved project had the potential to generate waste materials that could exceed the local waste diversion goals or daily tonnage limit of local landfills, resulting in a potentially significant impact. However, this impact would be reduced to less than significant with implementation of Mitigation Measure M-UT-3 (Waste Management Plan). As discussed above, the FEIR concluded that the approved project's impacts to solid waste landfill capacity and potential for operational damage to or disruption of existing utilities would be less than significant with mitigation.

6.10.2 Modified Project Analysis

No other utilities beyond the SSPL have been identified within the modified project site. As discussed in Section 3 Description of the Modified Project, markers would be placed along the SSPL alignment within the modified project prior to the start of construction to flag the location of the pipe to avoid damage during construction. Nevertheless, consistent with the approved project, the modified project would implement Mitigation Measure M-UT-1a (Pre-Construction Utility Identification and Notification). In the event that utilities are identified, Mitigation Measures M-UT-1b (Protection of Other Utilities during Construction), M-UT-1c (Advance Notification), and M-UT-1d (Emergency Response Plan and Notification) would be implemented and would reduce impacts to ***less than significant***. Therefore, impacts to other utilities from the modified project would be ***less than significant with mitigation***.

³⁴ Ibid.

The modified project would generate construction waste at a substantially reduced level relative to the approved project; approximately 10 cubic yards of construction debris total would be off-hauled. The modified project would comply with section 708 of the San Francisco Environment Code, which would require the SFPUC to submit a Construction and Demolition Debris Management Plan to demonstrate how the project would meet the required minimum 75-percent diversion rate for project-related construction and demolition debris. Accordingly, the modified project's impact to solid waste would be **less than significant**. Mitigation Measure M-UT-3 (Waste Management Plan) would not be required for the modified project because compliance with section 708 of the San Francisco Environment Code sets more stringent minimum diversion rate requirements than those required by this measure. Therefore, the modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to utilities and service systems.

6.10.3 Cumulative Impacts

The FEIR concluded that, with implementation of mitigation measures, the approved project's contribution to potentially significant cumulative impacts to utilities and service systems would not be cumulatively considerable. Similarly, for the modified project, implementation of mitigation measures as well as compliance with local, state, and federal regulations would reduce the modified project's contribution to potential impacts to utilities and service systems (**less than significant with mitigation**).

6.10.4 Mitigation Measures

As discussed above, Mitigation Measure M-UT-3 (Waste Management Plan) identified in the FEIR for the approved project would not be required for the modified project.

The following mitigation measures identified in the FEIR for the approved project would continue to apply to the modified project, with refinements as appropriate to reflect the modified project's scope and construction methods, to reduce potential impacts related to Utilities and Service Systems in the vicinity of the modified project.

Mitigation Measure M-UT-1a: Pre-Construction Utility Identification and Coordination

Prior to construction activities, the SFPUC or its contractor(s) shall locate overhead and underground utility lines, such as natural gas, electricity, sewer, telephone, fuel, and water lines, that may be encountered during excavation work. Pursuant to state law, the SFPUC or its contractor(s) shall notify USA North. Information regarding the exact location of existing utilities shall be confirmed before construction activities begin. Utilities may be located by customary techniques such as geophysical methods and hand excavation.

The SFPUC or its contractor(s) shall notify all affected utility service providers in advance of the project construction plans and schedule. The SFPUC or its contractor(s) shall make arrangements with these entities regarding the protection, relocation, or temporary disconnection of services prior to the start of construction, and promptly reconnect services, as required.

Mitigation Measure M-UT-1b: Protection of Other Utilities during Construction

Detailed specifications shall be prepared as part of the design plans to include procedures for the excavation, support, and fill of areas around subsurface utilities, cables, and pipes. If it is not

feasible to avoid an overhead utility line during pipeline construction, the SFPUC or its contractor(s) shall coordinate with the affected utility owner to either temporarily or permanently support the line, or to de-energize the line while temporarily supporting the overhead line.

Mitigation Measure M-UT-1c: Advance Notification

The SFPUC or its contractor(s) shall coordinate with the appropriate utility service providers to ensure advance notification to residents, owners, and businesses in the ~~CSPL2~~ modified project area of a potential utility service disruption two to four days in advance of construction. The notification shall provide information about the timing and duration of the potential service disruption.

Mitigation Measure M-UT-1d: Emergency Response Plan and Notification

The SFPUC or its contractor(s) shall develop an emergency response plan prior to commencing construction activities that identifies response measures in the event of a leak or explosion resulting from a utility rupture. In addition, the SFPUC or its contractor(s) shall notify local fire departments of any time damage to a gas utility results in a leak or suspected leak, or whenever damage to any utility result in a threat to public safety.

6.11 Land Use

6.11.1 FEIR Summary

The FEIR found that short-term construction activities had the potential to generate a combination of physical effects, including generation of dust, noise, and vibration and impeded access to existing land uses such as residences, schools, hospitals, and businesses in the approved project area as well as the potential to indirectly disturb or disrupt these land uses. The FEIR addressed direct physical impacts related to traffic, noise and vibration, and air quality under those resource topic sections. The land use discussion in the FEIR, therefore, addressed impacts related to the temporary disruption of adjacent land uses that could result from a combination of these indirect effects after mitigation measures were applied. With the exception of Site 12 (El Camino Real from Millbrae to Burlingame), the FEIR determined that the temporary disruption or displacement of existing land uses during construction would be less than significant due to the implementation of the advance notification measures included as part of the approved project. These measures included advance notification and interim update requirements for affected businesses, property owners, facility managers, and residents along the approved project alignment as well as coordination with schools, parks/recreational facilities, and major institutions (e.g., hospitals, churches) to schedule construction activities for periods that would reduce impacts, minimize disruptions, and ensure safety of facility operations. For Site 12, the FEIR identified Mitigation Measures M-TR-1a (Traffic Control Plan), M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]), M-NO-1 (Supplemental Noise Controls), M-NO-2 (Supplemental Noise Controls at Schools), M-AQ-1a (Dust Control Measures), and M-AQ-1b (Exhaust Control Measures) to address potential construction-related traffic disruptions, noise effects, and air quality impacts associated with work in the El Camino Real corridor; it was determined that impacts related to land use would be less than significant with mitigation. At project sites along San Mateo Creek (e.g. Sites 4 and 5), land use impacts were determined to be less than significant.

6.11.2 Modified Project Analysis

Modified project construction activities would be similar to or reduced relative to the approved project activities along San Mateo Creek as construction would occur within the same general project footprint as the approved project, would not require roadway lane closures or substantial access restrictions, would be shorter in duration than the approved project, and would include reduced equipment use as compared with the approved project. Mitigation Measures M-TR-1a (Traffic Control Plan), M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]), M-NO-1 (Supplemental Noise Controls), M-NO-2 (Supplemental Noise Controls at Schools), M-AQ-1a (Dust Control Measures), and M-AQ-1b (Exhaust Control Measures) that were required for Site 12 in the FEIR are not applicable to the modified project. Therefore, land use impacts would be ***less than significant***.

6.11.3 Cumulative Impacts

The FEIR concluded that construction and operation of the approved project would not divide an established community or conflict with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects. Accordingly, the approved project was not found to contribute considerably to a cumulative land use impact. The FEIR also evaluated impacts resulting from temporary physical impacts that indirectly affect land use during construction and concluded that the approved project's proposed activities at Site 12, in combination with cumulative projects, would be cumulatively considerable and the impact would be significant and unavoidable.

The modified project would not introduce new land use types or require changes to land use designations. Because the modified project would not result in land use conflicts or contribute to the division of any established community, the modified project would not contribute to any potential cumulative impacts related to these land use and planning criteria (***no impact***).

The Meadowood Estates Subdivision cumulative project could be under construction at the same time as the modified project and could, in combination with construction of the modified project, result in temporary physical cumulative impacts that indirectly affect land use during construction. As discussed in Section 6.6, Traffic, Transportation, and Circulation, Section 6.4, Noise and Vibration, and Section 6.5, Air Quality, the modified project would have less-than-significant cumulative impacts related to transportation, noise and vibration, and air quality and accordingly, would have a less-than-significant cumulative impact related to disruption of land uses from construction-related noise, air quality, and transportation impacts. As similar to the modified project, construction of the cumulative project would have less-than-significant impacts on noise, air quality, and transportation due to compliance with local, regional, and state regulatory requirements and best management practices. Therefore, the modified project in combination with the cumulative project would not result in a significant cumulative impact on land use (***less than significant***).

6.11.4 Mitigation Measures

As discussed above, none of the mitigation measures identified in the FEIR for the approved project would be required for the modified project. These measures are: Mitigation Measures M-TR-1a (Traffic Control Plan), M-TR-1b (Additional Traffic Control Plan Measures for Site 12 [El Camino Real]), M-NO-1 (Supplemental Noise Controls), M-NO-2 (Supplemental Noise Controls at Schools), M-AQ-1a (Dust Control Measures), and M-AQ-1b (Exhaust Control Measures).

6.12 Energy

6.12.1 FEIR Summary

The FEIR determined that the approved project could result in potentially significant impacts related to wasteful fuel consumption during construction and that the impact would be reduced to a less-than-significant impact with implementation of Mitigation Measure M-AQ-1b (Exhaust Control Measures). Impacts related to long-term energy use during operations would be less than significant with mitigation.

6.12.2 Modified Project Analysis

The modified project would also require the consumption of fuel during construction though construction activities would be similar to or less than the approved project activities. As discussed in Section 6.5 Air Quality and Greenhouse Gas, Mitigation Measure M-AQ-1b (Exhaust Control Measures) would not be required for the modified project. Furthermore, the modified project would comply with applicable GHG-reduction measures from the 2023 San Francisco Planning Compliance Checklist for municipal projects, including those required under the Clean Construction Ordinance (San Francisco Environment Code, sections 2504–2506), which mandates Tier 2 or better equipment for large projects and adherence to the Construction and Demolition Debris Recovery Ordinance (Environment Code Chapter 14) for responsible material reuse and waste diversion.³⁵ The impact would be **less than significant** and would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to energy resources.

6.12.3 Cumulative Impacts

The FEIR concluded that the approved project's contribution to potentially significant energy resource impacts would be less than significant. The modified project's construction activities would be similar to or reduced relative to the approved project activities.

Because the modified project and the Meadowood Estates Subdivision cumulative project would be required to comply with local, state, and federal regulations pertaining to GHG reduction and waste-diversion measures, the modified project in combination with the cumulative project would not result in a significant cumulative impact on energy resources (**less than significant**).

6.12.4 Mitigation Measures

As discussed above, Mitigation Measure M-AQ-1b (Exhaust Control Measures), which was identified in the FEIR for the approved project, is not required for the modified project.

6.13 Public Services

The FEIR determined that the approved project would have less-than-significant impacts on increased demand for public services and long-term disruption of public services. As similar to the approved project, the modified project would not require new or expanded public services or facilities, and the impact would be **less than significant**. Therefore, the modified project would not result in any new

35 San Francisco Planning Department. (2026, June 16). Greenhouse Gas Analysis: Compliance Checklist for 2005.0963ENV-05.

significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to public services.

6.14 Recreation

The FEIR analyzed the approved project's potential to result in indirect impacts on the recreational experience during construction and determined that the impact would be less than significant for most approved project sites, except those located in proximity to playgrounds at two urban project sites. The FEIR determined that the approved project would have no indirect or direct impacts to recreational experiences or facilities during or after construction at sites along San Mateo Creek (e.g., Sites 4 and 5). Construction activities for the modified project would occur along the existing SFPUC right-of-way, which is not a public recreational area nor near any parks or public recreational facilities; therefore, the modified project would have **no impact** on recreational resources. The modified project would not result in any new significant environmental impacts or substantially increase the severity of a previously identified significant environmental impact related to recreation.

6.15 Wind and Shadow, Population and Housing, Agricultural and Forest Resources, and Mineral Resources

The FEIR determined that the following resource topics are not applicable to the approved project or that the approved would not result in any impacts to those resources: wind and shadow, population and housing, agriculture, and mineral resources. Because the modified project would not displace people or housing and is not located within or adjacent to agricultural or mineral resource areas, the analysis and conclusions of the FEIR for the approved project do not differ from those for the modified project. Although the modified project does include aboveground features (i.e., concrete walls), these elements would not result in substantial wind or shadow effects due to their small size and location within a confined creek corridor. Therefore, **no impacts** to these resources would result from implementation of the modified project.

7. Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the FEIR certified by the San Francisco Planning Commission on September 30, 2010, remain valid and that no supplemental environmental review is required. The proposed modifications to the project would not cause new significant impacts not identified in the FEIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause new significant environmental impacts or a substantial increase in the severity of previously identified significant effects. Therefore, no supplemental environmental review is required beyond this addendum.

I do hereby certify that the above determination has been made pursuant to state and local requirements.



Lisa Gibson
Environmental Review Officer

July 23, 2026

Date of Determination:

cc: Hannah Young, San Francisco Public Utilities Commission
Distribution List

Attachment A: SFPUC Standard Construction Measures

SFPUC Standard Construction Measures¹

1. SEISMIC AND GEOTECHNICAL STUDIES:

All projects will prepare a characterization of the soil types and potential for liquefaction, subsidence, landslide, fault displacement, and other geological hazards at the project site and will be engineered and designed as necessary to minimize risks to safety and reliability due to such hazards. As necessary, geotechnical investigations will be performed.

2. AIR QUALITY:

All projects within San Francisco City (the City) limits will comply with the Construction Dust Control Ordinance. All projects outside the City will comply with applicable local and State dust control regulations. All projects within City limits will comply with the Clean Construction Ordinance. Projects outside City limits will comply with San Francisco or other applicable thresholds for health risks. All projects, both within and outside of City limits, will comply with either San Francisco or other applicable thresholds for construction criteria air pollutants.

To meet air quality thresholds, all projects (as necessary) will implement air quality controls to be tailored to the project, such as using high tier engines, Verified Diesel Emissions Control Strategies (VDECS) such as diesel particulate filters, customized construction schedules and procedures, and low emissions fuel.

3. WATER QUALITY:

All projects will implement erosion and sedimentation controls to be tailored to the project site such as, fiber rolls and/or gravel bags around stormdrain inlets, installation of silt fences, and other such measures sufficient to prevent discharges of sediment and other pollutants to storm drains and all surface waterways, such as San Francisco Bay, the Pacific Ocean, water supply reservoirs, wetlands, swales, and streams. As required based on project location and size, a Stormwater Control Plan (in most areas of San Francisco) or a Stormwater Pollution Prevention Plan (SWPPP) (outside of San Francisco and in certain areas of San Francisco) will be prepared. If uncontaminated groundwater is encountered during excavation activities, it will be discharged in compliance with applicable water quality standards and discharge permit requirements.

4. TRAFFIC:

All projects will implement traffic control measures sufficient to maintain traffic and pedestrian circulation on streets affected by construction of the project. Traffic control measures may include, but not be limited to, flaggers and/or construction warning signage of

¹ San Francisco Public Utilities Commission. 2015 (July 1). SFPUC Standard Construction Measures. Memorandum from H. L. Kelly, Jr., General Manager, to Michael Carlin, Juliet Ellis, Barbara Hale, Kathryn How, Tommy Moala, Steven Ritchie, and Eric Sandler.

work ahead; scheduling truck trips during non-peak hours to the extent feasible; maintaining access to driveways, private roads, and off-street commercial loading facilities by using steel trench plates or other such method; and coordination with local emergency responders to maintain emergency access. For projects in San Francisco, the measures will also, at a minimum, be consistent with the requirements of San Francisco Municipal Transportation Agency (SFMTA)'s Blue Book. Any temporary rerouting of transit vehicles or relocation of transit facilities would be coordinated with the applicable transit agency, such as SFMTA Muni Operations in San Francisco. All Projects will obtain encroachment permits from the applicable jurisdiction for work in public roadways.

5. NOISE:

All projects will comply with local noise ordinances regulating construction noise. The SFPUC shall undertake measures to minimize noise disruption to nearby neighbors and sensitive receptors during construction. These efforts could include using best available noise control technologies on equipment (i.e., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources (i.e., pumps and generators) away from sensitive receptors, erecting temporary noise barriers, and other such measures.

6. HAZARDOUS MATERIALS:

Where there is reason to believe that site soil or groundwater that will be disturbed may contain hazardous materials, the SFPUC shall undertake an assessment of the site in accordance with any applicable local requirements (e.g., Maher Ordinance) or using reasonable commercial standards (e.g., Phase I and Phase II assessments, as needed). If hazardous materials will be disturbed, the SFPUC shall prepare a plan and implement the plan for treating, containing or removing the hazardous materials in accordance with any applicable local, State and federal regulations so as to avoid any adverse exposure to the material during and after construction. In addition, any unidentified hazardous materials encountered during construction likewise will be characterized and appropriately treated, contained or removed to avoid any adverse exposure. Measures will also be implemented to prevent the release of hazardous materials used during construction, such as storing them pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible followed by collection and disposal in accordance with applicable laws. SFPUC will report spills of reportable quantity to applicable agencies (e.g., the Governor's Office of Emergency Services).

7. BIOLOGICAL RESOURCES:

All project sites and the immediately surrounding area will be screened to determine whether biological resources may be affected by construction. A qualified biologist will also carry out a survey of the project site, as appropriate, to note the general resources and identify whether habitat for special-status species and/or migratory birds, are present. In the event further investigation is necessary, the SFPUC will comply with all local, State, and federal

requirements for surveys, analysis, and protection of biological resources (e.g., Migratory Bird Treaty Act, federal and State Endangered Species Acts, etc.). If necessary, measures will be implemented to protect biological resources, such as installing wildlife exclusion fencing, establishing work buffer zones, installing bird deterrents, monitoring by a qualified biologist, and other such measures. If tree removal is required, the SFPUC would comply with any applicable tree protection ordinance.

8. VISUAL AND AESTHETIC CONSIDERATIONS, PROJECT SITE:

All project sites will be maintained in a clean and orderly state. Construction staging areas will be sited away from public view where possible. Nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon project completion, project sites on SFPUC-owned lands will be returned to their general pre-project condition, including re-grading of the site and re-vegetation or re-paving of disturbed areas to the extent this is consistent with SFPUC's Integrated Vegetation Management Policy. However, where encroachment has occurred on SFPUC-owned lands, the encroaching features may not be restored if inconsistent with the SFPUC policies applicable to management of its property. Project sites on non-SFPUC land will be restored to their general pre-project condition so that the owner may return them to their prior use, unless otherwise arranged with the property owner.

9. CULTURAL RESOURCES:

All projects that will alter a building or structure, produce vibrations, or include soil disturbance will be screened to assess whether cultural resources are or may be present and could be affected, as detailed below.

Archeological Resources.

No archeological review is required for a project that will not entail ground disturbance. Projects involving ground disturbance will undergo screening for archeological sensitivity as described below and implement, as applicable, SFPUC's Standard Archeological Measures I (Discovery), II (Monitoring) and III (Testing/Data Recovery) per the Cultural Resources Attachments. Standard Construction Measure I will be implemented on all projects involving ground disturbance and Standard Archeological Measures II and III will be implemented based on the screening process described below for projects assessed as having the potential to encounter archeological sites and/or if an archeological discovery occurs during construction.

Projects involving ground disturbance will initially be screened to identify whether there is demonstrable evidence of prior ground disturbance in the project site to the maximum vertical and horizontal extent of the current project's planned disturbance. For projects where prior complete ground disturbance has occurred throughout areas of planned work, SFPUC will provide evidence of the previous disturbance in the

Categorical Exemption application and no further archeological screening will be required.

For projects that are on previously undisturbed sites or where the depth/extent of prior ground disturbance cannot be documented, or where the planned project-related ground disturbance will extend beyond the depth/extent of prior ground disturbance, additional screening will be carried out as detailed below and shown on the attached flow chart titled "SFPUC Standard Construction Measure #9 Archeological Assessment Process". The additional screening will be conducted by the SFPUC's qualified archeologist (defined as meeting the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) and, if a consultant, selected in consultation with the San Francisco Planning Department's Environmental Review Officer (ERO) and meeting criteria or specialization required for the resource type as identified by the ERO.

- 1) The SFPUC qualified archeologist will conduct an archival review for the project site, including review of Environmental Planning's (EP's) archeological GIS data and/or a records search of the California Historical Resources Information System (CHRIS) and other archival sources as appropriate. The qualified archeologist will also conduct an archeological field survey of the project site if, in the archeologist's judgment, this is warranted by site conditions. Based on the results, the archeologist will complete and submit to EP a Preliminary Archeological Checklist (PAC) (version dated 4/2015, to be amended in consultation with the ERO as needed). The PAC will include recommendations for the need for archeological testing, additional research and/or treatment measures consistent with Archeological Measures I, 11, and 111, to be implemented by the project to protect and/or treat significant archeological resources identified as being present within the site and potentially affected by the project.
- 2) The EP Archeologist (for projects within the City) or the ERO's archeological designee (for projects outside the City) will then conduct a Preliminary Archeological Review (PAR) of the PAC and other sources as warranted; concur with the PAC recommendations; and/or amend the PAC in consultation with the SFPUC archeologist or archeological consultant to require additional research, reports, or treatment measures as warranted based on his/her professional opinion.
- 3) The SFPUC shall implement the PAC/PAR recommendations prior to and/or during project construction consistent with Standard Archeological Measures I, 11, and III, and shall consult with the EP Archeologist in selecting an archeological consultant, as needed, to implement these measures.
- 4) Ground disturbing activities in archeologically sensitive areas, as identified through the above screening, will not begin until required preconstruction

archeological measures of the PAC/PAR (e.g., preparation of an Archeological Monitoring Plan, Archeological Treatment Plan, and/or an Archeological Research Design and Data Recovery Plan) have been implemented.

Historic (Built Environment) Resources.

For projects within the City that include activities with the potential for direct or indirect effects to historic buildings or structures, initial CEQA screening will include a review, for the project footprint and up to one parcel surrounding the footprint of CCSF's online planning map, all relevant survey data, preservation address files, and other pertinent sources for previously-identified, historically significant buildings and building and structures more than 45 years old that have not been previously evaluated. For projects outside of the City, initial CEQA screening will include a records search of EP's CCSF historical resources data, CHRIS, and other pertinent sources for historically significant or potentially significant buildings and structures older than 45 years.

For projects that would modify an existing building or structure that has been determined by EP as being a significant historical resource (i.e., appears eligible to qualify for the CRHR), or that would introduce new aboveground facilities in the vicinity of a significant historical resource, or that would affect previously unevaluated buildings or structures more than 45 years old, the SFPUC will retain a qualified architectural historian (defined as meeting the Secretary of the Interior's Professional Qualification standards and, if a consultant, also selected in consultation with the ERO) to conduct a historical resource evaluation (HRE).

SFPUC will submit the project description and the HRE to the CCSF Planning Department Preservation Planner or to the ERO's-designated qualified architectural historian to assess potential effects. Where the potential for the project to have adverse effects on historic buildings or structures is identified, the CCSF Planning Department Preservation Planner or the ERO's designee will consult with SFPUC to determine if the project can be conducted as planned or if the project design can be revised to avoid the significant impact, and will comply with applicable procedures set forth in Historic Architectural Resource Measure I. If these options are not feasible, the project will need to undergo further review with EP and mitigation may be required. If so, the project would not qualify for a Categorical Exemption from CEQA review.

Where construction will take place in proximity to a building or structure identified as a significant historical resource but would not otherwise directly affect it, the SFPUC will implement protective measures, such as but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such buildings or structures are avoided.

CULTURAL RESOURCES ATTACHMENTS

Flow Chart: SFPUC Standard Construction Measure #9 Archeological Assessment Process (not included in this document and available upon request)

SFPUC Archeological Measure I (Archeological Discovery)

SFPUC Archeological Measure II (Archeological Monitoring)

SFPUC Archeological Measure III (Archeological Testing/Data Recovery)

Historic Architectural Resource Measure

SFPUC Preliminary Archeological Checklist (PAC) (not included in this document and available upon request)

SFPUC ARCHEOLOGICAL MEASURE I (Archeological Discovery)

The following requirements are applicable to:

- All projects that will include soil (ground) disturbance, and
- Any discovery of a potential historical resource or of human remains, with or without an archeological monitor present.

Prior to ground disturbing activities:

A. Alert Sheet. The SFPUC shall, prior to any soils disturbing activities, distribute the Planning Department archeological resource "ALERT" sheet to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the Environmental Review Officer (ERO) with a signed affidavit from each contractor confirming distribution to all field personnel.

Upon making a discovery:

B. Work Suspension. Should a potential archeological resource be encountered during project soils disturbing activity, with or without an archeological monitor present, the project Head Foreman shall immediately suspend soils disturbing activities within 50 feet (15 meters) of the discovery, protect the find from further disturbance, and notify the SFPUC Project Manager (PM) and/or Environmental Project Manager (EPM), who shall immediately notify the ERO for further consultation.

C. Qualified Archeologist. All archeological work conducted under this measure shall be performed by an archeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61); consultants will be selected in consultation with the ERO and meeting the criteria or specialization required for the resource type as identified by the ERO in a manner consistent with SFPUC's on-call contracting requirements.

D. Assessment and Additional Measures. If the ERO determines that the discovery is a potential archeological/historical resource, the archeologist, in consultation with the ERO, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The ERO will consult with SFPUC and the qualified archeologist on these recommendations and may require implementation of additional measures as set forth below in Archeological Measures II and III, such as preparation and implementation of an Archeological Monitoring Plan, an Archeological Testing Plan, and/or an Archeological Data

Recovery Plan, and including associated research designs, descendant group consultation, other reporting, curation, and public interpretation of results.

E. Report Reviews. All plans and reports prepared by an archeological consultant, as specified herein, shall be submitted first and directly to the ERO for review and comment with a copy to the SFPUC and shall be considered draft reports subject to revision until final approval by the ERO.

F. Draft and Final Archeological Resources Reports. For projects in which a significant archeological resource is encountered and treated during project implementation (see Archeological Measures II and III), 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, research questions addressed, and research results. Information that may put at risk any archeological resource shall be provided in a separate, removable insert within the draft final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: two copies to the applicable California Historic Information System Information Center (CHRIS), one copy to each descendant group involved in the project, and documentation to the San Francisco Planning Department of transmittal of the above copies. In addition, the Planning Department shall be provided one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR, which shall include copies of any formal site recordation forms (CA DPR 523 series) and/or National Register of Historic Places/California Register of Historical Resources nominations.

G. Other Reports. In instances of high public interest or interpretive value, the ERO may require different or additional final report content, format, and distribution than that presented above.

H. Human Remains, Associated or Unassociated Funerary Objects. SFPUC shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the SFPUC PM, EPM, ERO, and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, he/she will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains will be

conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the ERO.

- I. Consultation with Descendant Communities.** Consistent with AB 52 requirements, if requested, the SFPUC shall provide opportunities for Native American descendant groups to provide input during project planning for projects that may affect potential Tribal Cultural Resources. In addition, on discovery during construction of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other descendant group, an appropriate representative of the descendant group shall be contacted by SFPUC at the direction of the ERO. SFPUC will offer this representative the opportunity to monitor archeological field investigations of the site and to consult with the ERO regarding the appropriate treatment and, if applicable, interpretation of the site and the recovered materials.
- J. Construction Delays.** Archeological monitoring and/or data recovery programs required by this measure may 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 this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.

SFPUC ARCHEOLOGICAL MEASURE II (Archeological Monitoring)

- A. Archeological Monitoring Plan (AMP).** Where an archeological field investigation to identify expected buried or submerged resources cannot reasonably be carried out during project planning/ environmental review (for example, where definitive determination would require extensive street opening prior to construction), prior to any project-related soils-disturbing activities the qualified archeologist identified under Archeological Measure I.C. will consult with SFPUC and the ERO to develop an Archeological Monitoring Plan (AMP). The AMP which will be implemented in conjunction with soil-disturbing activities during construction. Preparation and implementation of an AMP also may be required based on the results of pre-construction archeological testing or upon a discovery during construction.

The AMP shall include the following elements, at minimum:

- Historical context and research design for assessment of resource types likely to be encountered;
- Project activities to be archeologically monitored and intensity of monitoring of each type and location of project construction activity; and

SFPUC Standard Construction Measures

- Procedures for the documentation, significance and integrity assessment, treatment, interpretation and reporting of the types of resources likely to be encountered.

B. Reporting. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO at the end of construction (See Archeological Measure I.E [Report Reviews] and I.F. [Final Archeological Research Report]).

C. Monitoring Authorities

- The archeological monitor will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures as set forth in Archeological Measure III.
- The Archeological Monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis.
- The Archeological Monitor(s) shall be present on the project site according to a schedule identified in the AMP, subject to modification upon ERO concurrence, based on findings.

D. Testing/Data Recovery. In the event of a discovery during construction, if the ERO and archeological consultant determine that the discovery is a significant resource (that is, a resource that meets the eligibility criteria of the California Register of Historic Resources or qualifies as a unique archeological resource) that will be adversely affected (that is, where the project would result in loss of data potential) or that additional investigation is required to make this determination, all applicable elements of Archeological Measure III (Archeological Testing/Data Recovery) also will be implemented.

SFPUC ARCHEOLOGICAL MEASURE III (Testing/ Data Recovery)

The following provisions apply prior to or during construction when a significant archaeological resource (as defined in Measure I1.D) or an archeological resource of undetermined significance is expected to be present in the work area and the ERO, in consultation with the qualified archeologist, determines that an archeological field investigation is needed to determine: a) the presence of an archeological resource, b) whether it retains depositional integrity, and c) whether it qualifies as a legally significant resource under CEQA criteria. All archeological work under this Measure will be carried out by a qualified archeologist as identified in Archeological Measure I.C. Per Archeological Measure I.J, implementation of this measure shall not exceed four weeks except at the direction of the ERO and only if this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.

A. Archeological Testing Program. If an archeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the archeological consultant shall consult with the ERO to prepare and implement an Archeological Testing Plan (ATP) that identifies:

- Key research questions and associated data needs,
- Testing/ sampling methods, and
- Testing locations.

Results of testing shall be presented to ERO in a written report following Measure I.E. If, based on the archeological testing program, the archeological consultant finds and the ERO concurs that significant archeological resources may be present, Measures 111.B and/or 111.C below will be implemented.

B. Treatment. If the project could adversely affect a significant (CRHR-eligible) archeological resource, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b) (3)(a) and (b).

If preservation in place is determined to be infeasible, the SFPUC at its discretion shall either:

- Re-design the proposed project so as to reduce the adverse effect to a less- than-significant level through preservation in place or other feasible measures; and/or
- For a resource important for its association with an important event or person, or which is of demonstrable public interest for both its scientific and historical values (e.g., a submerged ship), and where feasible, preserve the resource in place with appropriate documentation; or, if not feasible to preserve in place, systematically document and/or recover for interpretive use, at the discretion of the ERO, and/or;
- For an archeological resource significant primarily for its data potential, design and implement an archeological data recovery program, as detailed under Measure 111.D, below.

C. Archeological Data Recovery Plan (ADRP). For resources for which the elected treatment is archeological data recovery, the archeological consultant, in consultation with the ERO, shall prepare and implement an ADRP. It will identify how the significant information the archeological resource is expected to contain will be recovered and preserved. Data recovery results will be reported in the FARR, as detailed in Measure I.F. The ADRP shall include the following elements:

- Historic context and research design
- Field methods and procedures, including sampling strategy
- Archeological monitoring recommendations for ongoing construction
- Cataloguing and laboratory analysis
- Discard, deaccession, and curation policy

- Interpretive program
- Security measures

HISTORIC ARCHITECTURAL RESOURCE MEASURE

- A. Qualified Architectural Historian.** When a building or structure that has been determined to be an historical resource is identified within a project's area of potential effects, the SFPUC will retain a qualified architectural historian (defined as meeting the Secretary of the Interior's Professional Qualification standards and, if a consultant, selected in consultation with the ERO) to conduct a historical resource Evaluation (HRE).
- B. Effects Assessment.** The SFPUC will submit the project description and the HRE to CCSF Planning Department Preservation Planner or to the ERO's-designated qualified architectural historian to assess potential effects. If a potential for the project to have adverse effects on historic buildings or structures is identified, the CCSF Planning Department Preservation Planner or the ERO's architectural historian designee will consult with SFPUC to determine if the project can be implemented as planned or if the project design can be revised to avoid the significant impact. If these options are not feasible, the project will need to undergo further review with EP and mitigation may be required. If so, the project may not qualify for a Categorical Exemption from CEQA review.
- C. Potential Vibration Effects.**
1. Where construction takes place in proximity to a building or structure identified as a significant historical resource but would not otherwise directly affect it, the SFPUC will implement protective measures, such as, but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such structures are avoided.
 2. For projects that will use vibratory equipment generating vibration in excess of 0.2 inches per second, peak particle velocity adjacent to historic buildings susceptible to vibration, the SFPUC will engage a qualified historic architect or historic preservation professional to document and photograph the pre-construction condition of the building and prepare a plan for monitoring the building during construction. The monitoring plan will be submitted to and approved by CCSF Planning Department Preservation Planner or the ERO's architectural historian designee prior to the beginning of construction and will be implemented during construction. The monitoring plan will identify how often monitoring will occur, who will undertake the monitoring, reporting requirements on vibration levels, reporting requirements on damage to adjacent historical resources during construction, reporting procedures to

follow if such damage occurs, and the scope of the preconstruction survey and post-construction conditions assessment.

3. If any damage to a historic building or structure occurs, the SFPUC will modify activities to minimize further vibration.
4. If any damage occurs, the building will be repaired following the Secretary of the Interior's Standards for the Treatment of Historic Properties under the guidance of a qualified historic architect or historic preservation professional.

D. Minor Alteration of Historic Buildings or Structures.

1. If a project involves minor alterations and/or rehabilitation to a building that qualifies as an historical resource, the proposed design will be reviewed by a qualified historic preservation professional in consultation with the CCSF Planning Department Preservation Staff or the ERO's architectural historian, who shall identify modifications to project design, as needed, to avoid or minimize effects to the historic integrity of the historical resource. The assessment also will provide direction on ensuring compliance with Secretary of the Interior's Standards and Guidelines.
2. To qualify for a Categorical Exemption, the project must be modified as identified in the HRE and all work must be conducted in compliance with Secretary of the Interior's Standards under the guidance of an architectural historian such that historical integrity of the building or structure would not be compromised

Attachment B: Refined Mitigation Monitoring and Reporting Program (MMRP)

Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek Project (Case No. 2005-0963ENV-05) – Refined Mitigation Monitoring And Reporting Program

Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
AIR QUALITY							
AQ-1	Construction emissions of criteria pollutants.	Mitigation Measure M-AQ-1a: Dust Control Measures The SFPUC shall include the following dust control measures in contract specifications: 1. <u>BAAQMD Basic Control Measures</u> - All active grading within the unpaved access road shall be watered at least twice daily. - All trucks hauling soil, sand, and other loose debris shall be covered or all trucks shall be required to maintain at least 2 feet of freeboard on public roads. - All unpaved access roads, parking areas, and staging areas at construction sites shall be watered as needed to minimize visible dust. - All paved access roads, parking areas, and staging areas at construction sites shall be swept daily (with vacuum trucks or dry street sweepers). - If visible soil material is carried onto adjacent public streets, adjacent streets shall be swept daily (with vacuum trucks or dry street sweepers).	Modified project area	1) SFPUC EMB 2) CM Team	1) SFPUC EMG 2) SFPUC EMG	1) Ensure that dust control measures are included in contract documents. 2) Monitor compliance with all applicable dust control measures. Report non-compliance and ensure corrective action.	1) Design 2) Construction
UTILITES AND SERVICE SYSTEMS							
UT-1	Potential damage to or temporary disruption of existing utilities.	Mitigation Measure M-UT-1a: Pre-Construction Utility Identification and Coordination Prior to construction activities, the SFPUC or its contractor(s) shall locate overhead and underground utility lines, such as natural gas, electricity, sewer, telephone, fuel, and water lines, that may be encountered during excavation work. Pursuant to state law, the SFPUC or its contractor(s) shall notify USA North. Information regarding the exact location of existing utilities shall be confirmed before construction activities begin. Utilities may be located by customary techniques such as geophysical methods and hand excavation. The SFPUC or its contractor(s) shall notify all affected utility service providers in advance of the project construction plans and schedule. The SFPUC or its contractor(s) shall make arrangements with these entities regarding the protection, relocation, or temporary disconnection of services prior to the start of construction, and promptly reconnect services, as required.	Modified project area	1) SFPUC EMB 2) CM Team	1) SFPUC EMG 2) CM Team	1) Ensure that utility lines that may be encountered are identified in contract documents. Ensure that contract document includes the requirement to provide advance notification of construction activities to potentially affected utility service providers. 2) Verify that the contractors contact USA Alert and receive notification from utilities in accordance with Cal-OSHA regulations. Ensure contractor makes arrangements with these entities regarding the protection, relocation, or temporary disconnection of services and promptly reconnect services, as required.	1) Design 2) Preconstruction and Construction
UT-1 (cont.)		Mitigation Measure M-UT-1b: Protection of Other Utilities during Construction Detailed specifications shall be prepared as part of the design plans to include procedures for the excavation, support, and fill of areas around subsurface utilities, cables, and pipes. If it is not feasible to avoid an overhead utility line during pipeline construction, the SFPUC or its contractor(s) shall coordinate with the affected utility owner to either temporarily or permanently support the line, or to de-energize the line while temporarily supporting the overhead line.	Modified project area	1) SFPUC EMB 2) CM Team	1) SFPUC EMG 2) CM Team	1) Ensure that utility protection measure is included in contract documents. 2) Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.	1) Design 2) Construction
UT-1 (cont.)		Mitigation Measure M-UT-1c: Advance Notification The SFPUC or its contractor(s) shall coordinate with the appropriate utility service providers to ensure advance notification to residents, owners, and businesses in the CSPL2 modified project area of a potential utility service disruption two to four days in advance of construction. The notification shall provide information about the timing	Modified project area	1) SFPUC EMB 2) SFPUC Communications	1) SFPUC EMG 2) CM Team	1) Ensure that contract documents specify that contractor is required to provide advance notice to the SFPUC so that, in turn, SFPUC communications can notify residences. 2) Provide notification as required in advance of	1) Design 2) Preconstruction and Construction

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Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
		and duration of the potential service disruption.				construction activities. Maintain records of notifications.	
UT-1 (cont.)		Mitigation Measure M-UT-1d: Emergency Response Plan and Notification The SFPUC or its contractor(s) shall develop an emergency response plan prior to commencing construction activities that identifies response measures in the event of a leak or explosion resulting from a utility rupture. In addition, the SFPUC or its contractor(s) shall notify local fire departments any time damage to a gas utility results in a leak or suspected leak, or whenever damage to any utility results in a threat to public safety.	Modified project area	1) SFPUC EMB 2) CM Team 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that the requirement for contractor to prepare and submit an emergency response plan is included in contract documents. 2) Ensure that the contractor prepares and submits emergency response plan prior to construction activities and that the plan complies with requirements. 3) Monitor to ensure that the contractor implements measures in emergency response plan and contract documents, report noncompliance, and ensure corrective action.	1) Design 2) Preconstruction 3) Construction
BIOLOGICAL RESOURCES							
BI-1	Impacts on jurisdictional waters and riparian habitat.	Mitigation Measure M-BI-1a: Protection of Jurisdictional Waters and Riparian Habitat The SFPUC shall minimize impacts by avoiding watercourses and riparian habitat where feasible. The construction contractor shall install temporary fencing to demarcate the boundary for construction. The SFPUC shall mitigate impacts on jurisdictional waters through a combination of on-site compensation areas as necessary. The SFPUC shall select compensation sites that ensure no net loss of jurisdictional waters, in consultation with jurisdictional resource agencies.	Modified project area	1) SFPUC EMB 2) CM Team	1) SFPUC EMG 2) SFPUC EMG	1) Ensure that riparian habitat protection measure is included in contract documents. 2) Monitor to ensure that the contractor implements the measure as specified in the contract document, report noncompliance, and ensure corrective action.	1) Design 2) Construction
BI-1 (cont.)		Mitigation Measure M-BI-1b: Environmental Awareness Training Before any construction activities begin, workers shall attend an Environmental Awareness training session developed by a qualified biologist for all construction personnel. The Environmental Awareness training shall describe locations of jurisdictional waters and riparian habitat and inform personnel of the value of these habitats. The Environmental Awareness training also shall address the potential presence special-status plant and animal species, the species' sensitivity to human activities, and the legal protection afforded to them. It will include information on the adverse effects of invasive weeds and the control measures that must be implemented. The Environmental Awareness training also shall address the penalties for violating these legal protections, their responsibilities, applicable mitigation measures, and the roles and authority of the qualified biologist. If non-English-speaking workers will be on site, the construction contractor shall provide interpreters. Each worker shall be presented with an illustrated fact sheet and shall be responsible for complying with the guidelines as set forth therein. Any new workers coming onto the site shall first have to undergo such training. Participants shall be required to sign a form acknowledging their attendance and understanding of the materials presented.	Modified project area	1) SFPUC EMB 2) SFPUC EMG 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that the contract documents include the requirement to attend training. 2) Obtain and review resume or other documentation of consulting biologist's qualifications developing training program. 3) Ensure that all personnel attend worker awareness training prior to beginning work and sign training sign-in sheet. Maintain copies of sign-in sheets.	1) Preconstruction 2) Preconstruction 3) Preconstruction and Construction
BI-1 (cont.)		Implement Mitigation Measure M-BI-2a (Vegetation Restoration Plan)	Modified project area	-	-	-	-
BI-1 (cont.)		Implement Mitigation Measure M-BI-3c (Protection of Steelhead)	Modified project area	-	-	-	-

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Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
BI-2	Impacts on sensitive habitats and common habitats.	Mitigation Measure M-BI-2a: Vegetation Restoration Plan The SFPUC shall prepare a Vegetation Restoration Plan with detailed specifications for minimizing invasive weeds and restoring all temporarily disturbed areas and shall ensure that the Plan is successfully implemented by the contractor. The Vegetation Restoration Plan shall be prepared by a restoration specialist familiar with growing requirements of native plant species. The plan shall be provided to the CDFW, and RWQCB during the permitting process. Therefore, the restoration measures are subject to modification by permitting agencies in the exercise of their oversight responsibilities. Described below are the invasive weed control measures, minimum restoration measures, and success criteria that must be included in the Vegetation Restoration Plan. To control invasive weeds, SFPUC shall incorporate the following measures into the construction plans and specifications for work: 1. Construction equipment shall arrive at the project clean and free of soil, seed, and plant parts to reduce the likelihood of introducing new weed species. 2. Any imported fill material, soil amendments, gravel, etc., required for construction and/or restoration activities that would be placed within the upper 12 inches of the ground surface shall be free of vegetation and plant material. 3. Certified, weed-free, imported erosion-control materials (or rice straw in upland areas) shall be used exclusively, as applicable (this measure concerns biological material and does not preclude the use of silt fences, etc.). 4. The environmental awareness training program for construction personnel shall include an orientation regarding the importance of preventing the spread of invasive weeds. 5. To reduce the movement of invasive weeds, the contractor shall stockpile topsoil removed during excavation of trenches or test pits, which shall be subsequently replaced during reestablishment of disturbed project areas. 6. Implementation of these measures during construction and site restoration shall be verified by a biological monitor or other onsite inspector. In order to restore these areas, SFPUC shall implement the following: 7. Restoration shall include re-establishment of original natural contours. 8. At areas to be disturbed temporarily and where native plant species predominate, remove and store topsoil. Replace topsoil when construction is complete. 9. For grassland vegetation areas, reseed the affected areas with a noninvasive native grass and forb seed mix. 10. For other plant communities, replant the affected areas with similar plants. 11. All grassland, scrub, woodland, or riparian areas not permanently disturbed shall be restored to their baseline conditions. Percent cover and vegetation composition (other than non-native annual grassland) shall have a variation of no more than 30 percent from the baseline cover and composition condition.	Modified project area	1) SFPUC EMG (restoration specialist) 2) SFPUC EMB 3) CM Team 4) SFPUC NRLMD	1) SFPUC EMG and SFPUC NRLMD 2) SFPUC EMG 3) SFPUC EMG and SFPUC NRMLD 4) SFPUC NRLMD	1) Prepare vegetation restoration plan in accordance with requirements. 2) Ensure that the contract documents include on-site restoration measures, including invasive species control measures (e.g., seed mix and invasive weed control). 3) Monitor to ensure that the contractor implements the measure as specified in the contract document, report noncompliance, and ensure corrective action. 4) In accordance with the plan, monitor performance of restoration activities relative to performance standards and success criteria and determine if adaptive management is needed. Report results of restoration activities as required per the restoration plan.	1) Design 2) Design 3) Construction 4) Post-construction

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Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek Project (Case No. 2005-0963ENV-05) – Refined Mitigation Monitoring And Reporting Program

Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
		12. Restored areas shall be monitored at least annually for at least 3 years or greater, as determined in consultation with applicable permitting agencies and/or as needed to verify whether the vegetation is fully established and self-sustaining. 13. If full maturity of slow-growing vegetation will take longer than 3 years, such species shall be fully established and self-sustaining to meet the criteria, and the monitoring period shall be extended accordingly to verify whether the vegetation is fully established and self-sustaining. 14. Restoration areas shall be monitored for invasive plants annually in the first 3 years following replanting. If invasive plants are found during the 3-year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria. 15. Alternatively, if success criteria cannot be met at the end of 3 years, the SFPUC may explore alternative mitigation options, such as offsite compensation or mitigation credits, with the applicable resource agencies.					
BI-2 (cont.)		Implement Mitigation Measure M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat)	Modified project area	-	-	-	-
BI-2 (cont.)		Implement Mitigation Measure M-BI-1b (Environmental Awareness Training)	Modified project area	-	-	-	-
BI-2 (cont.)		Implement Mitigation Measures M-BI-3c (Protection of Steelhead)	Modified project area	-	-	-	-
BI-3	Impacts on special-status species – direct mortality and/or habitat effects.	Mitigation Measure M-BI-3a: Protection of San Mateo Woolly Sunflower and Franciscan onion All occurrences of San Mateo woolly sunflower and occurrences of Franciscan onion shall be avoided. These plants shall be protected with a suitable temporary barrier. A qualified biological monitor shall be present during installation of the barrier. The biological monitor shall also regularly inspect the integrity of the barrier and notify appropriate personnel if repairs are needed. A barrier will be installed to protect populations of San Mateo wooly sunflower and Franciscan onion located along the modified project access road where project-related construction vehicle traffic will occur.	Modified project area	1) SFPUC EMB 2) CM Team 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that protection measures are incorporated in contract documents. 2) Ensure that temporary barrier is installed to protect Franciscan onion, and San Mateo woolly sunflower. 3) Monitor to ensure that contractor implements measures in contract documents, report noncompliance, and ensure corrective action.	1) Design 2) Preconstruction 3) Construction
BI-3 (cont.)		Mitigation Measure M-BI-3c: Protection of Steelhead The following measures shall be implemented to avoid and minimize impacts on steelhead: Seasonal work windows will be implemented to reduce the likelihood of adverse effects on migrating and spawning juvenile and adult steelhead. In-stream construction, including streambank and channel bed construction, shall be limited to the low-precipitation period (June 1 through October 31). By limiting construction to this period, SFPUC shall avoid the potential for adverse effects during the primary migration and spawning season for adults, the primary egg	Modified project area	1) SFPUC EMB 2) SFPUC EMG (biologist with CDFW scientific collections permit and NMFS approval) 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that contract documents include applicable steelhead protection measures including turbidity monitoring and reporting measures. 2) Obtain and review resume or other documentation of consulting biologist's qualifications, including biologist's CDFW scientific collections permit and NMFS approval. Conduct fish rescue and relocation and document activities in monitoring logs. 3) Monitor to ensure that contractor implements measures	1) Design 2) Construction 3) Construction

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Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
		incubation season, and the primary emigration season for juveniles. In-stream construction shall occur during the designated in-water work window between June 1 and October 31, unless modified by written agreement with NMFS. (Construction could occur in May during a dry year, but any in-stream work before June 1 would be subject to approval by jurisdictional agencies, who must make a determination that impacts would not occur with earlier construction.) 1. To ensure adequate site restoration, temporary fill, including cofferdams and access ramps, shall be completely removed following completion of construction activities, and the stream channel and construction zone (including riparian habitat) shall be restored to pre-construction conditions to the maximum extent feasible 2. To reduce turbidity, sedimentation, and other water quality impacts in San Mateo Creek during construction activities (primarily in-stream excavation and cofferdam installation), the SFPUC or their contractor(s) shall: • Monitor periods of construction activity and coordinate with the contractor to identify periods when localized increases in turbidity may occur. • Install a silt curtain or other sedimentation control measures to trap sediment and prevent sediment and silt load increases to waterways during in-stream project construction. • Not cause visible oil, grease, or foam in the work area or downstream. 3. Ensure project in-stream construction activities do not cause turbidity increases in surface waters over 15 nephelometric turbidity units (NTUs) over background turbidity as measured in surface waters 300 feet downstream • from the working area. • In the event that project construction activities create a visible plume in surface waters, initiate monitoring of turbidity levels at the discharge site and 300 feet downstream, taking grab samples for analysis of NTU levels twice per day during the work period while the visible plume persists and initiate corrective actions to reduce turbidity in the event of exceedances. 4. Avoidance and minimization measures shall be implemented by the SFPUC or their contractor(s) to the extent practicable during project construction activities and shall include: • The discharge of petroleum products or other excavated materials to surface waters shall be prohibited. • Project construction activities shall minimize substrate disturbance. • The SFPUC will include measures for the storage of hazardous materials and protocol for addressing accidental spills, in compliance with SFPUC Standard Construction Measure #6. 5. The SFPUC shall conduct a fish rescue and relocation effort to minimize the effects of in-stream construction activities on steelhead and other aquatic species. The SFPUC shall ensure that a qualified biologist, with a current CDFW scientific collections permit (SCP) and NMFS approval, conducts the fish rescue and relocation effort to rescue and relocate fish from areas isolated for dewatering. The fish rescue effort shall be implemented during the dewatering of the in-stream construction area. At a minimum, the fish rescue and relocation shall include the following measures:			in contract documents. Report noncompliance and ensure corrective action.		

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				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
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		- Installation and removal of all temporary dewatering infrastructure shall be conducted under the guidance and supervision of a biologist with a current CDFW SCP to avoid injuring or killing aquatic species within the work area. - Prior to dewatering the in-stream construction zone, a qualified biologist shall use NMFS-approved methods to relocate aquatic species to suitable habitat downstream of the construction zone. - Initial dewatering shall be conducted under supervision of a qualified biologist to reduce potential injury or mortality to juvenile steelhead and other aquatic species from stranding. Dewatering intakes shall be screened with mesh in accordance with NMFS fish screening criteria for anadromous salmonids (NMFS, 1997) to prevent entrainment of steelhead					
BI-3 (cont.)		Mitigation Measure M-BI-3d: Protection of California Red-legged Frog and Northwestern Pond Turtle During construction work the SFPUC shall implement the following measures, which are consistent with the USFWS Programmatic Consultation specific to the CRLF (USFWS, 1999b). - A qualified biologist shall survey the work site two weeks before the start of any construction-related activities. If frog adults, tadpoles, or eggs are found, SFPUC shall contact the USFWS to determine whether relocating any life stages is appropriate. If adult CRLF are present, the construction contractor shall allow the qualified biologist reasonable time to safely collect and move them from the work site before work activities begin. Only with suitable permission from USFWS may qualified biologists capture, handle, and relocate CRLF. - Prior to initiation of ground-disturbing activities within 150 feet of suitable aquatic habitat (i.e., San Mateo Creek), a qualified biologist shall conduct a survey for northwestern pond turtle. Surveys shall be conducted two weeks prior to construction and repeated 48 hours prior to ground disturbance. If no individuals are observed, construction may proceed with implementation of all other applicable mitigation measures. - If a northwestern pond turtle is observed within the active work area, work shall halt immediately within a minimum 50-foot radius of the individual and the turtle shall be allowed to move out of the work area voluntarily, if feasible. - If the individual does not leave the work area, a qualified biologist may relocate the NWPT to suitable nearby habitat. Relocation shall occur in accordance with CDFW and USFWS, as appropriate. - A qualified biologist shall be present at the work site until the site is determined clear of CRLF/NWPT and ground disturbance activities are complete. The SFPUC shall then designate a person (the biological monitor) to inspect on-site compliance with all minimization measures. The qualified biologist shall ensure that the biological monitor receives the training outlined above and training in the identification of CRLF/NWPT. In coordination with the Project Engineer, the biological monitor and the qualified biologist shall have the authority to halt any action that might result in impacts on the species.	Modified project area	- SFPUC EMB - SFPUC EMG and CM Team - CM Team	- SFPUC EMG - SFPUC EMG - SFPUC EMG	- Ensure that contract documents include requirement for contractor to provide advance notification to SFPUC of construction activities to allow SFPUC to perform preconstruction surveys. - Obtain and review resume or other documentation of consulting biologist's qualifications. Conduct preconstruction surveys and construction biological monitoring. - Monitor to ensure that the contractor implements measures in contract documents. Report noncompliance and ensure corrective action.	- Design - Preconstruction and Construction - Construction

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		4. During project activities, all trash that may attract predators or hide CRLF/NWPT shall be properly contained and removed from the work site daily. Following construction, the construction contractor shall remove all trash and construction debris from work areas. 5. The access road, staging area, and the total area of the activity shall be limited to the minimum necessary to complete construction and shall be delimited on the project drawings before work begins. The routes and boundaries shall be outside riparian and wetland areas to greatest extent feasible. 6. Before work begins, including staging of equipment and supplies, the qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area as deemed necessary by the qualified biologist to prevent CRLF/NWPT or other animals from entering the work area. The construction contractor shall install fencing with a minimum height of 3 feet with buried footing or sealed tightly to the ground surface to prevent CRLF/NWPT from crawling under and entering the site. After supervising fence installation, the qualified biologist shall conduct a pre-construction survey of the work area. The biological monitor shall inspect the exclusion fencing periodically to confirm proper maintenance. The construction contractor shall confine all equipment and construction operations to the defined work areas.					
BI-3 (cont.)		Mitigation Measure M-BI-3e: Protection of Nesting Birds The SFPUC shall avoid loss of active nests and potential mortality of special-status and non-special-status migratory birds by implementing the following measures: 1. For raptors, if construction activity begins during the breeding season (February 1 to August 31), a preconstruction survey for nests and nesting birds shall be conducted within 2 weeks prior to initiation of construction activities. The survey shall be conducted by qualified biologists (i.e., biologists with experience conducting nesting bird surveys) and shall cover all forest, woodland, and scrub habitats in the construction limits and all suitable habitats within 250 feet of the construction limits, access permitting. Because construction at each site may occur at different times, surveys shall be conducted in each individual construction area according to the schedule described above. Additionally, if there are any breaks in construction activity at any site for 2 weeks or more, surveys must be conducted again in adjacent habitats to ensure that that no active nests or nesting birds have taken residence adjacent to project sites. If no active nests are detected during surveys, then no additional mitigation is required. If an active raptor nest is located, work activities will be delayed within a distance agreed upon in consultation with CDFW taking into account the habitat surrounding the nest, typical limits are within 250 feet of the nest location until avoidance measures have been implemented. Appropriate avoidance measures shall include the following (however, other equally effective measures may be developed in consultation with the CDFW): - If it is determined that construction and maintenance activities will not affect an active nest, activities may proceed without restriction. - A no-disturbance buffer will be established around the nest location to avoid disturbance or destruction of the nest site until after the breeding season or after a qualified wildlife biologist determines that the young have fledged.	Modified project area	1) SFPUC EMB 2) SFPUC EMG and CM Team 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	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 preconstruction biological surveys and construction biological monitoring and related activities (e.g., establishing buffer zones, agency consultation, etc.). Document monitoring activities in logs. Consult with agencies as required. 3) Monitor to ensure that the contractor implements measures in contract documents, report noncompliance and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction

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Sunset Supply Pipeline Erosion Repair Project at San Mateo Creek Project (Case No. 2005-0963ENV-05) – Refined Mitigation Monitoring And Reporting Program

Impact No.	Impact Summary	Mitigation Measure	Location	Monitoring and Reporting Program			
				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
		- The extent of no-disturbance buffers will be determined by a qualified wildlife biologist in consultation with the applicable resource agencies (i.e., USFWS and/or CDFW) and will depend on the level of noise or disturbance, line of sight between the nest and the disturbance, ambient levels of noise and other disturbances, and other topographical or artificial barriers. - If construction activities begin prior to the breeding season (between September 1 and January 31), then construction may proceed without mitigation for nesting raptors. However, to qualify, construction activities in this instance would be those that will remain in full force. A minor activity that initiates construction but does not involve the full force of construction activities shall not qualify as "pre-existing construction." If any raptors nest in the vicinity of the project under a pre-existing construction condition, then it is assumed that they are or will habituate to the construction activities. Under this scenario, the pre-construction survey shall still be conducted on or after February 1 to identify any active nests in the vicinity, and active sites shall be monitored by a wildlife biologist periodically until after the breeding season or after the young have fledged (usually late June to mid-July). If active nests are identified on or immediately adjacent to the project site, then all non-essential construction activities (e.g., equipment storage, meetings) shall be avoided in the immediate vicinity of the nest site; however, construction activities may proceed. 2. For other nesting birds protected by the MBTA, a pre-construction survey to identify active nests will be conducted by a qualified biologist no more than two weeks before the start of construction from February 1 through August 31. Pre-construction surveys for active nests will be conducted within 50 feet of the work areas and the nest locations will be mapped, to the extent allowed by access. If pre-construction surveys indicate an active nest within 50 feet of the project, a determination will be made by a qualified biologist, in consultation with the CDFWG, as to whether construction work will affect the active nest. If it is determined that construction will not affect an active nest, construction will proceed without any restriction or mitigation measure. If it is determined that construction will affect an active nest, then avoidance is the only mitigation available. Construction will be delayed within 50 feet of such a nest until a qualified biologist determines that the subject bird species of concern are not nesting, unless in consultation with the CDFWG, a determination is made that construction work would not affect the active nest. If there is a break of at least five days in construction activities during the nesting season, an additional nesting bird survey shall be conducted to ensure that no birds have occupied nests during the break in construction activities.					

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		Mitigation Measure M-BI-3f: Protection of Bats For trees to be removed a qualified biologist shall identify those having the potential to be day or maternity roosts for bat species that might occur within the modified project area. To minimize impacts on roosting bats to the greatest extent feasible, SFPUC first shall identify trees that might be potential day or maternity roosts, and then shall attempt to drive bats from those trees prior to their removal. At least one week prior to tree removal, a qualified biologist (i.e., familiar with identification of bats and signs of bats) will survey the trees to be removed for roosting bats. The biologist will thoroughly search trees or snags that provide appropriate roosting habitat (trees with foliage, cavities, or that are hollow) for bats or evidence of bats. If no roosting bats or evidence of bats are found, removal of trees may proceed. If bats are found or evidence of use by bats is present, the following procedures shall be implemented before felling the tree: 1. Trees should be removed under the warmest possible conditions. Peel any sections of the exfoliating bark off the tree gently and search for any roosting bats underneath. Create noise and vibrations on the tree itself. Noise and vibrations may include running a chain saw and making shallow cuts in the trunk (where bark has been peeled off) and striking the tree base with fallen limbs or tools such as hammers. Disturbance should be near-continuous for 10 minutes, and then another 10 minutes should pass, before the tree is felled. When cutting sections of the trunk, if any hollows or cavities (such as woodpecker holes) are discovered, be especially careful to check for the presence of bats in those areas. Cut slowly and carefully at all times. If possible, section trunk near cavities to focus noise and vibrations, and open hollows by sectioning off a side. 2. The SFPUC will ensure that the trees are not removed or altered until CDFW has been contacted for guidance on measures to avoid and minimize disturbance of the bats. Additional measures may include monitoring trees, and excluding bats from a tree until it is removed and/or restricting the timing of tree removal and use of a construction buffer to avoid breeding disturbance of young before they are able to fly (for pallid bats, this period is between April and August).	Modified project area	1) SFPUC EMB 2) SFPUC EMG and CM 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that contract documents include bat protection measures. 2) Obtain and review resume or other documentation of consulting biologist’s qualifications. Conduct preconstruction biological surveys and biological monitoring. Document monitoring activities in logs. Consult with CDFW as required. 3) Monitor to ensure that the contractor implements measures in contract documents, report noncompliance and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction
BI-3 (cont.)		Implement Mitigation Measure M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat)	Modified project area	-	-	-	-
BI-3 (cont.)		Implement Mitigation Measure M-BI-1b (Environmental Awareness Training)	Modified project area	-	-	-	-
BI-3 (cont.)		Implement Mitigation Measure M-BI-2a (Vegetation Restoration Plan)	Modified project area	-	-	-	-
BI-4	Water discharge effects on riparian and/or aquatic resources.	Implement Mitigation Measure M-BI-3c (Protection of Steelhead)	Modified project area	-	-	-	-

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BI-5	Impacts on protected trees.	Mitigation Measure M-BI-5a: Replacement of Trees to be Removed The following measures shall be implemented for trees to be removed: 1. Where feasible, native trees to be removed that are located along or adjacent to San Mateo Creek-shall be replaced and located within SFPUC ROW according to the SFPUC's Right of Way Integrated Vegetation Management Policy. If it is not feasible to compensate for all native tree removal in SFPUC's ROW in the vicinity of the project, then native tree compensation shall occur at a suitable off-site location. A qualified biologist shall conduct post-construction monitoring of trees for five years.	Modified project area	1) SFPUC EMB 2) CM Team 3) SFPUC NRLMD	1) SFPUC EMG 2) SFPUC EMG and SFPUC NRLMD 3) SFPUC NRMLD	1) Ensure that contract documents include tree replacement measures. 2) If replanting trees is feasible within the existing SSPL ROW or San Mateo Creek, ensure that the contractor implements tree replacement measures according to the SFPUC's Right of Way Integrated Vegetation Management Policy. If replanting trees is not feasible within SSPL ROW or San Mateo Creek, identify a suitable planting site and implement tree replacement measures. Report noncompliance, and ensure corrective action. 3) Perform and document long-term monitoring of landscape plantings.	1) Design 2) Construction 3) Post-construction monitoring (up to five years)
BI-5 (cont.)		Mitigation Measure M-BI-5b: Protection of Trees to be Retained The following tree protection measures shall be implemented: 1. At sites located along and adjacent to San Mateo Creek, a qualified arborist-shall supervise and approve necessary pruning. 2. For trees to be retained the qualified arborist shall provided appropriate measures to ensure adequate protection from construction. Measures could include: (1) installing tree protective fencing; (2) pruning low limbs to provide for equipment access and work; (3) providing root buffer zones during the wet season for construction activities encroaching into the tree protection zone (TPZ); (4) prohibiting storage of equipment and materials within root buffer zones or within two feet of the base of any tree; and (5) excavating and pruning roots by hand within TPZ.	Modified project area	1) SFPUC EMB 2) CM Team 3) CM Team	1) SFPUC EMG 2) SFPUC EMG 3) SFPUC EMG	1) Ensure that tree protection measures are incorporated in contract documents. 2) Monitor and approve necessary pruning. 3) Monitor to ensure that the contractor implements tree protection measures in contract documents, report noncompliance, and ensure corrective action.	1) Design 2) Preconstruction and Construction 3) Construction 4) Post-construction
BI-5 (cont.)		Implement Mitigation Measure M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat)	Modified project area	-	-	-	-
HYDROLOGY AND WATER QUALITY							
HY-1	Degradation of water bodies as a result of erosion and sedimentation or a hazardous materials release during construction.	Implement Mitigation Measures M-BI-1a (Protection of Jurisdictional Waters and Riparian Habitat)	Modified project area	-	-	-	-
HY-1 (cont.)		Implement Mitigation Measure M-BI-1b (Environmental Awareness Training),	Modified project area	-	-	-	-
HY-1 (cont.)		Implement Mitigation Measure M-BI-2a (Vegetation Restoration Plan),	Modified project area	-	-	-	-
HY-1 (cont.)		Implement Mitigation Measure M-BI-3c (Protection of Steelhead).	Modified project area	-	-	-	-
HY-3	Degradation of surface water quality	Implement Mitigation Measure M-BI-3c (Protection of Steelhead)	Modified project area	-	-	-	-

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				Implementation and Reporting		Monitoring and Reporting Actions	Implementation Schedule
				Responsible Party	Reviewing and Approval Party		
	due to construction-related dewatering discharges.						
HY-5	Degradation of water quality, including offsite erosion and flooding, as a result of permanent alteration of drainage patterns.	Implement Mitigation Measures M-BI-1a (Jurisdictional Water and Riparian Habitat Protection), and M-BI-2a (Vegetation Restoration Plan)	Modified project area	-	-	-	-

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