San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

CEQA Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
SF PORT: Ongoing Maintenance Executive Directive 2021		
Case No.		**Permit No.**
2021-003773ENV		
■ **Addition/ Alteration**	☐ **Demolition (requires HRE for Category B Building)**	☐ **New Construction**

Project description for Planning Department approval.

SF PORT: Ongoing Maintenance Executive Directive 2021-01 - The proposed project is the Port of San Francisco's regular program of maintenance , repair, rehabilitation, restoration, replacement and removal activities of any previously authorized, currently serviceable structure or fill ("Port-wide Maintenance Program"). The standard construction measures ("Measures") that will be followed by Port staff and its contractors in execution of the Port-wide maintenance program are detailed in the attached Engineering and Facilities Maintenance Directive 2021-01.

STEP 1: EXEMPTION TYPE

The project has been determined to be exempt under the California Environmental Quality Act (CEQA).

■	**Class 1 - Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.
☐	**Class 3 - New Construction.** Up to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 32 - In-Fill Development.** New Construction of seven or more units or additions greater than 10,000 sq. ft. and meets the conditions described below: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services. **FOR ENVIRONMENTAL PLANNING USE ONLY**
☐	**Other** ____
☐	**Common Sense Exemption (CEQA Guidelines section 15061(b)(3)).** It can be seen with certainty that there is no possibility of a significant effect on the environment. **FOR ENVIRONMENTAL PLANNING USE ONLY**

STEP 2: ENVIRONMENTAL SCREENING ASSESSMENT

TO BE COMPLETED BY PROJECT PLANNER

☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g. use of diesel construction equipment, backup diesel generators, heavy industry, diesel trucks, etc.)? (*refer to The Environmental Information tab on the San Francisco Property Information Map)*
☐	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? **Note that a categorical exemption shall not be issued for a project located on the Cortese List** *if box is checked, note below whether the applicant has enrolled in or received a waiver from the San Francisco Department of Public Health (DPH) Maher program, or if Environmental Planning staff has determined that hazardous material effects would be less than significant. (refer to The Environmental Information tab on the San Francisco Property Information Map)*
☐	**Transportation:** Does the project involve a child care facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Archeological Resources:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeology review is required.
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (*refer to The Environmental Information tab on the San Francisco Property Information Map*) **If box is checked, Environmental Planning must issue the exemption.**
☐	**Average Slope of Parcel = or > 25%, or site is in Edgehill Slope Protection Area or Northwest Mt. Sutro Slope Protection Area:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, or (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area? (*refer to The Environmental Planning tab on the San Francisco Property Information Map*) **If box is checked, a geotechnical report is likely required and Environmental Planning must issue the exemption.**
☐	**Seismic Hazard:** ☐ **Landslide or** ☐ **Liquefaction Hazard Zone:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area, or (4) grading performed at a site in the landslide hazard zone? *(refer to The Environmental tab on the San Francisco Property Information Map)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.**

Comments and Planner Signature (*optional*): Joy Navarrete

STEP 3: PROPERTY STATUS - HISTORIC RESOURCE

TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Property Information Map)*	
☐	**Category A:** Known Historical Resource. **GO TO STEP 5.**
■	**Category B:** Potential Historical Resource (over 45 years of age). **GO TO STEP 4.**
☐	**Category C:** Not a Historical Resource or Not Age Eligible (under 45 years of age). **GO TO STEP 6.**

STEP 4: PROPOSED WORK CHECKLIST

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
■	2. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	3. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	4. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	5. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	6. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	7. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	8. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☐	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5**.
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
■	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. **Reclassification of property status**. *(Attach HRER Part I)* ☐ Reclassify to Category A a. Per HRER b. Other *(specify)*: ☐ Reclassify to Category C *(No further historic review)*
☐	2. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	3. **Interior alterations to publicly accessible spaces that do not** remove, alter, or obscure **character defining features**.
☐	4. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	5. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.

☐	6. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	7. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	8. **Work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*Analysis required*):
☐	9. **Work compatible** with a historic district (Analysis required):
☐	10. **Work that would not materially impair** a historic resource (Attach HRER Part II).
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST sign below.	
■	**Project can proceed with exemption review**. The project has been reviewed by the Preservation Planner and can proceed with exemption review. **GO TO STEP 6.**
Comments (*optional*):	
Preservation Planner Signature:	

STEP 6: EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

■	**No further environmental review is required. The project is exempt under CEQA. There are no unusual circumstances that would result in a reasonable possibility of a significant effect.**	
	Project Approval Action: Executive Directive Approval by Chief Harbor Engineer	**Signature:** Joy Navarrete 06/04/2021
	Once signed or stamped and dated, this document constitutes a n exemption pursuant to CEQA Guidelines and Chapter 31of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination to the Board of Supervisors can only be filed within 30 days of the project receiving the approval action. Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals.	

PORT OF SAN FRANCISCO
ENGINEERING AND FACILITIES MAINTENANCE DIRECTIVE 2021-01

Directive Topic: Ongoing Maintenance and Repairs on Port of San Francisco Property

Issued By: Rod K. Iwashita, P.E., D.PE, F.ASCE, Chief Harbor Engineer
DocuSigned by: 0E1789F376C24F4...

Tim Felton, Deputy Director – Maintenance Division
DocuSigned by: Tim Felton 4C5A89C6CC39479...

Issue Date: **Final Issue Date: April 15, 2021**
Effective Date: April 2021 through December 2026

Effected Parties All Engineering and Maintenance Division Staff

1. Purpose

The Port of San Francisco ("Port") jurisdiction spans 7 1/2 miles of the City of San Francisco ("City") urban and industrial waterfront adjacent to San Francisco Bay (the Bay) as shown on Figure 1. Most of the Port's buildings, piers and supporting infrastructure are over 80 years old. As a result, the Port has a large and growing backlog of needed maintenance and repairs. If rehabilitation and replacement of these existing structures are not addressed, many will continue to degrade and eventually fall into San Francisco Bay ("the Bay"). In order to maintain navigational and recreational safety, protect and improve water quality. improve shoreline access and appearance and enable continued commercial and industrial use of Port facilities, maintenance and repair must be performed on an ongoing basis.

This Directive addresses the Port's regular program of maintenance and repair activities, and fill removal ("Port-wide Maintenance Program"). The standard construction measures ("Measures") that will be followed by Port staff or contractors in execution of the Port-wide Maintenance Program are specified below. These Measures, task-specific procedures, and best management practices (BMPs) to avoid or minimize environmental impacts are detailed in the *Port of San Francisco Maintenance Manual 2021-2026* ("Maintenance Manual") and summarized in the attached Table 1 from the Maintenance Manual. With the implementation of the specified Measures and BMPs, no significant impacts are anticipated.

Maintenance and repair work performed will also comply with existing historic resource protection measures to ensure work is consistent with Secretary of Interior Historic Preservation Standard, if within a historic resource or an eligible historic resource.

The proposed activities are authorized under the Port's BCDC maintenance permit M1977.017.019, will comply with Port Building Code and all other applicable Federal, State and Local environmental regulatory permits and requirements. The Measures specified in this Directive, may be superseded and/or expanded with more detailed requirements from the Port's proposed reissuance of the U.S. Army Corps of Engineers and San Francisco Regional Water Quality Control Board permits for the Port-wide Maintenance Program.

Upon the effective date of this Directive, the Port's Engineering and Maintenance staff and their contractors are authorized to perform routine repair and maintenance of Port properties and facilities as described therein during the period from April 2021 through year end 2026.

2. Project Description – Port-wide Maintenance Program

2.1 Scope of Work

The maintenance and repair work described in this Directive will continue a program of construction activities necessary to maintain current Port facilities and uses, comply with Port Building Code requirements, maintain public safety including ADA code requirements and upgrades, alterations of facilities, and/or keep facilities in a state of good repair. The Port-wide maintenance program addressed by this Directive is generally limited to repair, rehabilitation, or replacement of any previously authorized, currently serviceable structure or fill, and permanent removal of dilapidated structures and other deleterious fill.

Activities considered to be routine maintenance are characterized by the following:

- The structure or fill [to be altered] is not to be put to uses differing from those specified or contemplated in the original construction. Minor deviations, including those due to changes in materials, techniques, standards, or regulatory requirements, are authorized;
- The repair, rehabilitation or replacement of structures or fill destroyed or damaged by discrete events (such as storms, floods, fire, etc.);
- No temporary fill material is placed in a manner that will be eroded by normal or expected high flow; and
- Temporary fill is removed in its entirety and the affected area returned to pre-construction elevations (and revegetated, as appropriate).

The Port-wide maintenance program, including estimated scope/quantity of work to be performed during the subject period, generally consists of:

1. ***Repair and Stabilization of Banks, Shorelines, Seawalls, Dikes and Riprap.*** The Port proposes to perform repairs and stabilization on an estimated 500 linear feet/year (up to 2,500 linear feet total over five years) of existing banks, including armored and unarmored shorelines, seawalls, dikes, and riprap.

2. ***Restoration of Navigational Aids or Regulatory Markers.*** The Port proposes repair or replacement of up to 5 existing navigation aids or regulatory markers per year (1 cubic yard/year) for a total of 25 existing navigation aids or regulatory markers over five years (approximately 5 cubic yards). Restoration of existing navigation aids and regulatory markers will be approved by and installed in accordance with the requirements of the U.S. Coast Guard, using marine-based equipment.

3. ***Repair and Replacement of Piles.*** The Port proposes repair or replacement of up to 1,000 piles per year (5,000 piles total over five years). Based on a typical 12" diameter pile, replacement would total approximately 784 square feet (or 726 cubic yard) of pile fill per year or 3,920 square feet (or 3,634 cubic yard) of pile fill over 5 years.

   The majority of existing bearing and fender piles for which the maintenance and repair is proposed are polyvinyl chloride (PVC wrapped, preservative-treated (typically ACZA or similar) Douglas fir or concrete. Wrapped, treated Douglas fir piles can last over thirty years in salt water and are capable of absorbing design ship impact energy without breaking. The Port periodically inspects, repairs, or replaces piles or pile wraps as required. When a limited number of piles require replacement without removal of the associated deck and substructure, in-kind replacement of dilapidated wood piles with piles of the same material is the most feasible repair. Port concrete pile repairs typically include removing areas of spalling concrete (chip hammer or water pressure), replacing deteriorated rebar, and coating the repaired pile area with shotcrete or concrete poured within form work.

   Wherever feasible, such as when a substantial contiguous area of pier deck and associated piles requires replacement, the Port will evaluate the use of alternative materials to treated wrapped wood piles (i.e., composite, steel, or concrete) where appropriate. Depending on the scale of such pile replacement activities, additional agency authorizations may be required.

4. ***Repair of Piers and Related Structures.*** The Port proposes repair or replacement of up to 100,000 square feet per year (500,000 square feet total over five years) of existing structures including piers, aprons/decks, wharves, bulkheads, fenders, dolphins, whalers, and connecting structures such as joists, stringers, pipelines, and utilities (including above and underground electrical, water, sewer, and storm water lines) attached to piers and structures, and minor coring of pier decks to install related structures. The majority of these structures are above or adjacent to and not within jurisdictional waters. These maintenance activities are limited to replacement or reconfiguration of existing facilities.

5. ***Repair or Replacement of Fencing and Related Structures.*** The Port proposes repair or replacement of up to 400 linear feet (200 square feet) per year or 2,000 linear feet total (1,000 square feet total) of existing fencing along piers and the shoreline.

6. ***Repair of Bulkheads and Breakwaters.*** The Port proposes repair or replacement of up to 300 square feet per year (or 100 linear feet) or 1,500 square feet total (or 500 linear feet) of existing bulkheads and breakwaters.

7. ***Replacement or Reconfiguration of Existing Docking Facilities.*** The Port proposes replacement or repair/reconfiguration of up to 150,000 square feet per year (750,000 square feet total) of existing docking facilities, including fixed piers, docks, gangways, cap beams including pier structures such as utilities.

8. ***Repair or Replacement of Bollards, Cranes, Pier Canopies, and Equipment.*** The Port proposes repair and/or replacement of up to 50 existing bollards, cranes, pier canopies, and other small appendages (including ladders, fender, and camels) per year (250 total appendages over five years).

9. ***Removal of Existing Dilapidated Piles and Associated Structures.*** The Port proposes to permanently remove dilapidated piles and associated structures, resulting in an overall net benefit to the in-water environment and navigation of the San Francisco Bay. The Port propose to remove up to 54,000 square feet per year (approximately 2,000 cubic yards) of damaged piles including fender piles, bearing piles and associated structures such as pier decks, stringers, beams, and girders. This equates to an estimated 270,000 square feet total of structure removal and 10,000 cubic yard of pile fill removal over the five-year program.

   The Port expects that the proposed activities would result in a net reduction of fill in the Bay and overwater structure shading, removal of navigational obstructions and safety hazards, and overall environmental benefit by removing aged structures, including creosote-treated wood.

10. ***Routine in-kind Maintenance and Repair of Port Structures***. The Port proposes to perform routine in-kind maintenance, repair, and alterations of Port facilities including:

    - paint, flooring, structural framing, partitions/demising walls;
    - code-required facility repairs and alterations of facilities to comply with fire, safety, and ADA compliance requirements;
    - installation of fencing, signage or awnings, security lights and fixtures, and restrooms that comply with historic standards and Port sign and design guidelines, as applicable;
    - exterior minor and in-kind repairs or replacement work on existing structures involving no expansion of the structure (e.g., windows, doors, stairs, paint or covering, roofing, restrooms, and improvements); and
    - utility repair/installation including above and underground electrical, water, sewer, and storm water lines servicing Port facilities.

2.2 Roles & Responsibilities

The responsibility to implement the Measures specified by this Directive, the BMPs set forth in the *Maintenance Manual* and the requirements of other permits and authorizations rests with each Project Manager in the Engineering Division and each Superintendent and Supervisor in the Maintenance Division. The following Port staff have responsibility for ensuring compliance with all applicable Port practices and other regulatory requirements and permit conditions:

- The Port's primary point of contact for managing staff responsible for maintenance, restoration and repair activities is the **Deputy Director of Maintenance.** The Maintenance Division includes a Safety Officer and Industrial Hygienist charged with ensuring that activities are implemented according to OSHA standards and other environmental regulations focused on worker health and safety.
- The Port's **Maintenance Superintendents** report to the Deputy Director of the Maintenance Division and manage the various trades or "shops" (e.g., pile-workers, plumbers, divers, crane operators, welders, electricians, etc.) who perform Port-wide maintenance work. The Superintendents are responsible for understanding the requirements and best management practices that apply to the work performed by the trades under their supervision, and for ensuring that shop Supervisors and staff have the training and resources required to conduct their work safely and in compliance with environmental and other project specifications.
- The Port's **Environmental Planners** support Maintenance, Engineering and Maritime Division projects including evaluating general work program, project and site-specific conditions to identify applicable permits, environmental conditions and requirements; obtaining environmental permits and approvals; assist in training Port staff regarding environmental regulatory requirements and environmental protection measures; provide oversight and assistance to ensure compliance with permit conditions; and support staff in reporting maintenance work and completed activities.
- Where the activity may affect the integrity of Port historic buildings and facilities, a **Port Planner - Historic Preservation Coordinator** reviews proposed work to ensure compliance with Secretary of Interior Standards for Historic Rehabilitation.
- The Port's Planning and Environment division is responsible for coordinating CEQA m BCDC and regulatory agency reviews and approvals.
- Compliance with applicable Port Building Code and Building or Encroachment Permit requirements is managed through the Port's **Chief Building Inspector,** or as otherwise designated by the **Port Chief Harbor Engineer.**

3. Standard Construction Measures

In addition to complying with all applicable local, State, and federal laws and regulations, these Measures are to be followed as a standard practice in the execution of every Port-wide maintenance program activity. While some of the Measures may not apply to a project, it is important to address each of the Measures either by implementing the Measure as described, explaining why it is not applicable to a particular project, or undertaking further investigation and developing a more detailed work plan to address the resource as provided in the resource-specific Measures. Some of the Measures are broad and will be tailored to suit each project site and surrounding circumstances.

3.1 Air Quality

All work performed under the Port-wide maintenance program will comply with Port Code 106A.3.2.3-Construction Dust Control, and the applicable provisions of San Francisco Health Code Article 22B-Construction Dust Control and City and County of San Francisco Clean Construction Ordinance, including use of cleaner engines and diesel emissions control features as specified by those regulations.

3.2 Water Quality

The Port-wide maintenance program activities are conducted in accordance with procedures and practices to avoid or minimize impacts and protect water quality as described in the Maintenance Manual and summarized in the attached Table 1. Any activities that involve land disturbance will comply with the erosion and sediment control measures required by the City's Construction Site Runoff Control Ordinance and Public Works Code Section 146. The subject activities would not generally disturb significant ground surface area and therefore would not be subject to regulation under the Statewide Construction Stormwater Permit.

3.2 Biological Resources

The procedures specified by the Port's Maintenance Manual incorporate construction practices specified by the 2018 Corps of Engineers/National Marine Fisheries Service Program Criteria deemed "not likely to adversely affect" special-status aquatic species (listed as threatened or endangered under the Federal Endangered Species Act or protected under the Federal Marine Mammal Protection Act) or habitats. The construction measures that the Port implements to avoid or minimize impacts on biological resources are specified in the Maintenance Manual and summarized in Table 1 (included below).

3.3 Hazardous Materials

In conducting routine maintenance activities Port staff may transport and use hazardous materials such as paints, solvents, sealants , adhesives, fuel, and oil at work sites. Hazardous materials and resultant wastes from use of hazardous materials (e.g., used oil, waste paint, creosote-treated wood debris) are handled, stored, and disposed of in accordance with all Federal, State, and local regulations. The Port has developed a comprehensive Hazard Communication Program which addresses safe hazardous materials handling procedures, such as labelling and storing materials pursuant to manufacturers specifications. The Port also has a Hazardous Materials Emergency Response Plan, which

specifies measures to prevent releases, such as use of secondary containment and keeping spill kits on site, as well as emergency response procedures. All Port Maintenance employees working in the field are trained on the hazard communication program and hazardous materials emergency response plan annually. Most are certified as 24-hour Oil Spill Technicians under the Hazardous Waste Operations standard specified by 29CFR1910.120(q)(6)(iii), with annual 8-hour refresher training.

Where there is reason to believe that site soil or groundwater that will be disturbed may contain hazardous materials, Port staff evaluate site-specific and project-specific conditions, including applicable local (e.g., San Francisco Health Code Article 22A, a.k.a Maher Ordinance), State, and Federal regulations, and implement appropriate health and safety and soil management measures accordingly.

3.4 Cultural Resources

Where the activity may affect the integrity of Port historic buildings and facilities, a Port Planner with expertise in historic resources preservation reviews proposed work to ensure compliance with Secretary of Interior Standards for Historic Rehabilitation.

The activities performed under the Port-wide maintenance program are generally limited to repair and replacement in-kind, or replacement with construction materials that are substantially similar and occupy the same or smaller area. Soil or sediment disturbing work occurs in areas that have previously been disturbed; no significant new excavation or dredging is proposed and the potential to encounter archeological resources is remote. Consequently, the Port-wide maintenance program is unlikely to encounter or pose potential to impact archeological resources. In the unlikely event that a Port maintenance project results in an archeological discovery Port staff would retain the services of a qualified archeological professional to assess, recover and monitor the discovery consistent with accepted archeological best practices in order to avoid adverse effects on buried or submerged historical resources.

3.5 Other Construction Measures

- ***Traffic.*** Due to the relatively small scale and frequently in-bay location of the subject maintenance activities, traffic impacts are generally negligible. However, all Port maintenance activities are performed in a manner that enables adequate traffic and pedestrian circulation. Port staff implement traffic control measures as needed, potentially including temporary barricades, signs warning of work ahead, and/or flaggers. Steel trench plates may be used to maintain access to roads, driveways, and pedestrian routes. If work requires lane closure or other temporary re-routing of traffic, Port staff would implement traffic control measures consistent with the requirements of the San Francisco Municipal Transportation Agency "Blue Book" and/or Cal Trans as applicable.
- ***Noise.*** All Port maintenance activities comply with local ordinances regulating construction noise.

Figure 2

Port of S.F. Jurisdiction/Maintenance Area

Table 1: Summary of Avoidance & Minimization Measures and Best Management Practices

RESOURCE CONCERN	KEY AVOIDANCE & MINIMIZATION MEASURES/BMPS
Biological Resources	
BMP #1: Noise Impacts from Pile Driving	Where feasible: • use of a vibratory hammer • impact hammer driving of wood piles limited to one hammer and less than 20 piles per day • 12” x 12” cushion block used between impact hammer and pile • “soft-start” technique
BMP #2: Shading	The Port anticipates that the proposed work will reduce the area of over-water structures. Existing over-water structures will be replaced/repaired, with no expansion or minimal expansion in footprint; other deteriorating structures may be removed permanently. Therefore, no BMPs or A&M measures for shading are proposed.
BMP #3: Invasive Species	The proposed maintenance and repair program will allow existing uses to continue but will not enable new navigation that poses potential for introduction of invasive species.
Fill Placement and Sediment Removal	
BMP #4: Fill Placement	Fill quantities will be the minimum necessary to achieve the project purpose. The Port anticipates a net removal of fill. The Port will maintain records of additions and removal of fill, to track net quantities and ensure this goal is met over the life of the RGP. If net increase is observed at end of RGP period, Port will negotiate appropriate compensatory mitigation with agencies.
BMP #5: Sediment Removal/Substrate Disturbance	Sediment removal quantities will be the minimum necessary to achieve the project purpose. When practicable and feasible, debris removal in the tidal zone will be done during low tides and the machines will pick up debris, not excavate, scrape, or grade the shoreline.

RESOURCE CONCERN	KEY AVOIDANCE & MINIMIZATION MEASURES/BMPS
Water and Sediment Quality	
BMP #6: Debris	Debris containment booms, floating debris screens, and/or absorbent booms will be positioned beneath and alongside work areas when necessary . During construction, the barges performing the work will be moored in a position to capture and contain the debris generated during any sub-structure or in-water work. Care will be taken to minimize debris falling into the water. In the event that debris does reach the bay, personnel in workboats will immediately retrieve the debris for proper handling and disposal. For small-scale over-water repairs and maintenance, tarps, tubs and/or vacuums will be used as appropriate to catch sawdust, debris, and drips. All construction material, wastes, debris, sediment, rubbish, trash, fencing, etc., will be removed from the site on a regular basis during work and at project completion. Debris will be transported to an authorized disposal area.
BMP #7: Stormwater	Minimal ground disturbance is anticipated since the proposed activities focus on maintenance and repair of existing hard-surfaced structures. Where ground disturbance is necessary, construction crews will reduce the footprint of disturbance to the minimum necessary to complete the project. Construction material that could wash or blow away will be covered every night and during any rainfall event. Construction materials will be stored in an area that does not freely drain to the Bay, free from standing water and wet soil, and protected from rain. If necessary, materials will be stored on skids or support timbers to keep them off the ground. Adequate erosion control supplies (sand bags, wattles, etc.) shall be kept on site and used to ensure materials are kept out of water bodies.
BMP #8: Spill Prevention and Response	Fueling and maintenance of vehicles and equipment will be conducted offsite, in designated areas away from the water (e.g., at the Port's Pier 50 Maintenance Facility) with the exception of barge-mounted and fixed cranes. Fueling locations will be inspected after fueling to document that no spills have occurred. Any spills will be cleaned up immediately and reported in accordance with existing Port standard operating procedures for spill reporting. All Port vehicles carry spill response supplies. Fueling cranes on barges or fixed to pier decks over water will be performed using proper fuel transfer procedures as specified by federal regulations for fuel transfer. Land-based equipment will be fueled by mobile trucks with secondary containment or at the Port's maintenance facility.

RESOURCE CONCERN	KEY AVOIDANCE & MINIMIZATION MEASURES/BMPS
BMP #8: Spill Prevention and Response (Continued)	Well-maintained equipment will be used to perform construction work, and, except in the case of a failure or breakdown, equipment maintenance will be performed off site. Repair crews will check heavy equipment daily for leaks, and not use equipment until any leak is fixed. If leaks or spills are encountered, the source of the leak will be identified, leaked material will be cleaned up, and the cleaning materials will be collected and will be properly disposed. All hazardous material shall be stored upland in storage trailers and/or shipping containers designed to provide adequate containment. Short-term laydown of hazardous materials for immediate use shall be permitted with the same anti-spill precautions. Petroleum products, chemicals, fresh cement, saw water, or concrete or water contaminated by the aforementioned shall not be allowed to enter the water.
BMP #9: Treated Wood	No replacement piles or other wood structures treated with creosote will be used. Treated wood products will be visually inspected upon arrival at the work site. Materials with visible residues or bleeding will be rejected. Wood products treated with an ammoniacal preservative (e.g., AZCA) will be rejected if there is a noticeable odor. Any chemically treated wood piles will be wrapped with an impact resistant biologically inert substance. Cleaning and maintenance activities that can remove particles of treated wood (such as power washing, sanding, and aggressive scrubbing) will be minimized. The Port will consider feasible alternatives to treated-wood piles for large repair projects (>100 piles) or where significant contiguous area of pile-supported structure is also being replaced. Cutting stations will be equipped with large tarps to capture debris and will be located well away from the water to minimize wind transport of sawdust. If preservative treatments, water repellents or other coatings are applied at the work site (e.g., on cuts and boreholes), the treatment will be applied at the cutting station and allowed to dry or cure before the structure is moved to the over-water area. If cutting or boring of treated wood or touch-up preservative applications must be performed over water, tarps, plastic tubs, or similar devices will be used to catch sawdust, debris, and drips. Preservatives will not be applied in the rain, and any excess preservative will be wiped off. Any debris that falls in the water will be promptly removed and handled as described above under “Debris” and “Stormwater”.

RESOURCE CONCERN	KEY AVOIDANCE & MINIMIZATION MEASURES/BMPS
BMP #10: Sediment Quality/Turbidity	Piles will be removed by direct pull or vibratory hammer, where possible. Piles that cannot be pulled will be cut two feet below the mudline to the extent feasible. Piles will be removed at the lowest practical tide condition. Disturbance of sediment will be minimized to the extent feasible during activities such as removal of piles and debris or minor excavation in conjunction with maintenance/repair of existing structures. Silt curtains are not generally warranted nor are they routinely used during Port maintenance activities because the existing procedures and small scale of the activities performed under the authorization for Portwide maintenance do not generate significant turbidity. Absorbent pads will be available for use in the event that petroleum sheen develops during sediment-disturbing activities. Existing sediment quality data in areas planned for pile removal or sediment excavation will be reviewed prior to conducting work to assess risks of mobilizing or exposing contaminated sediments Existing piles in areas with known elevated contaminant levels will be cut instead of pulled; cut piles will be capped as warranted.
BMP #11: Materials	Chemically treated wood piles will be wrapped with an impact resistant and biologically inert wrap. Floating devices will be composed of materials that will not disintegrate, including concrete, steel, plastics, or closed cell foam encapsulated sun resistant polyethylene. Most existing decking, and hence most replacement decking, will be composed of wood. However, the use of light-transmitting materials or measures will be used or considered whenever feasible.