



Alameda Creek Alliance

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Sent via certified mail and via e-mail to steve.smith@sfgov on July 13, 2009

Bill Wycko
Environmental Review Officer
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1650 Mission Street, Suite 400
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Re: Comments on Draft EIR for the Sunol Valley Water Treatment Plant Project

These are the comments of the Alameda Creek Alliance on the Draft Environmental Impact Report (DEIR) for the San Francisco Public Utilities Commission's (SFPUC) proposed Sunol Valley Water Treatment Plant Expansion and Treated Water Reservoir project (SVWTP project).

The Alameda Creek Alliance (ACA) is a community watershed group dedicated to the protection and restoration of the natural ecosystems of the Alameda Creek watershed. The ACA has over 1,700 members that live in or near the watershed. The ACA has been working to restore steelhead trout and protect endangered species in the Alameda Creek watershed, and specifically in the Sunol Valley, since 1997.

The ACA submitted formal scoping comments in August 2007 on the SVWTP project. Some of the biological issues raised in our scoping comments do not appear to have been addressed in the DEIR and are raised again below. These issues should be addressed.

The ACA also submitted formal comments on the SFPUC's Program Environmental Impact Report (PEIR) for the Water System Improvement Program (WSIP), and further submitted a letter (on October 28, 2008 after the certification of the PEIR) on the inadequacy of the PEIR, specifically with regard to the analysis of WSIP project and cumulative impacts on steelhead trout. These comments are incorporated by reference.

In general, the avoidance and mitigation measures in the DEIR for biological impacts to special status species and their habitats due to construction impacts of the SVWTP project seem appropriate, with some notable exceptions. We have some questions and some specific recommendations regarding analysis of impacts, mitigations (including suggested changes and additions to the project), and legal compliance. We also find the approach to evaluating greenhouse gas impacts and mitigations to be inadequate.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Miller".

Jeff Miller, Director

Steelhead Trout

The DEIR fails to fully analyze the potential impacts of construction and operation of the SVWTP project on Central California Coast steelhead trout and suitable habitat for steelhead trout. The DEIR discusses barriers downstream of the project area that currently block anadromous fish passage, as well as potential changes to steelhead access to the project area, which could occur as early as 2010 (DEIR p. 5-27). Since construction of the SVWTP project is scheduled from spring 2010 to summer 2013, there is a potential for construction impacts on listed steelhead trout and their habitat within the project area, as well as potential operational impacts.

Before permitting the SVWTP project, the U.S. Army Corps of Engineers will be required to undergo formal Section 7 consultation under the Endangered Species Act with the National Marine Fisheries Service (NMFS) regarding potential impacts to Central California Coast steelhead trout. A Biological Opinion by NMFS may result in changes to the design, construction, and/or operation of the SVWTP project, as well as additional measures to avoid or mitigate for impacts to steelhead trout.

Inadequacy of PEIR Mitigations for Impacts to Fish

The DEIR for the SVWTP project references mitigations in the PEIR for the WSIP regarding potential significant impacts to fisheries: mitigation 5.4.1-2, Diversion Tunnel Operation; mitigation 5.4.5-3a, Minimum Flows for Resident Trout on Alameda Creek; and mitigation 5.4.5-3b, Alameda Diversion Dam Restrictions or Fish Screens.

Our October 1, 2007 and October 28, 2008 letters to the SFPUC detail why these mitigations are inadequate. The PEIR: relies upon inadequate minimum flow releases from a 1997 settlement agreement with Fish and Game for steelhead mitigations; improperly relies on a speculative and uncertain Habitat Conservation Plan to mitigate for impacts to steelhead; contemplates dam operations that are in violation of state wildlife laws; propose to continue to illegally divert upper Alameda Creek stream flow for another decade, without necessarily bypassing flows sufficient to keep fish and wildlife downstream in good condition; are inadequate to reduce impacts to steelhead trout to less than significant; are inadequate to sustain resident rainbow trout below Calaveras Dam; rely on inadequate and flawed science to conclude that impacts are less than significant; and omit fisheries protections plans requested by the California Department of Fish and Game. These comments are incorporated by reference.

Interaction of SVWTP with Other SFPUC Projects

The DEIR needs to discuss the full potential impacts of expansion of the SVWTP related to other SFPUC projects. Will the expanded SVWTP and the increased sustainable capacity will increase the capacity for the SFPUC to move treated water through the water system? Will it facilitate increased rate of water diversion at the Alameda Diversion Dam and increased water storage at Calaveras Reservoir? Will the SVWTP facilitate the operation of the Alameda Diversion Dam, as proposed in the PEIR for the WSIP? The DEIR notes the PEIR conclusion of significant and unavoidable WSIP water supply impacts to streamflow in Alameda Creek below Alameda Creek Diversion Dam. We disagree that the impacts are unavoidable.

Critical Habitat

The DEIR notes that the very southern portion of the project area is designated as critical habitat under the Endangered Species Act for the Alameda whipsnake, and is proposed for re-

designation as critical habitat for the California red-legged frog. The red-legged frog designation will be finalized before construction commences. Critical habitats are areas with special conservation value and protected status due to habitat attributes essential for the conservation and the recovery of listed species. The SFPUC should not be interfering with recovery of listed species. ***It is unlawful under the Endangered Species Act for any entity to destroy or adversely modify designated critical habitat; and it is unlawful for any federal agency to permit or fund any project which would destroy or adversely modify designated critical habitat.***

The DEIR proposes illegally destroying (permanently removing) 0.19 acres of designated Alameda whipsnake critical habitat and 0.25 acres of proposed red-legged frog critical habitat. The DEIR does not analyze how much critical habitat for either species would be adversely modified (indirectly impacted) by the project. Critical habitat is not a guideline or suggestion – it is a designated legal protection under federal law - it does not matter how small the acreage of critical habitat proposed to be permanently removed is, this is habitat designated as protected for recovery of the listed species. Any SVWTP project facilities that encroach upon critical habitat need to be redesigned and moved.

Portions of Alameda Creek within and adjacent to the project area are very likely to be designated as critical habitat for Central California steelhead trout in the near future. The SVWTP and other SFPUC projects should not impact any of this habitat and any facilities constructed as part of the SVWTP project should be set back at least 100 feet from Alameda Creek to protect the riparian corridor and to avoid any irretrievable loss of creek and riparian habitat that will likely be designated in the near future as critical to the recovery of the species.

In December 2004 (69 FR 71880; see also 69 FR 33101, June 14, 2004), upper Alameda Creek and a riparian corridor buffer – including areas within and adjacent to the project area – were proposed by NMFS as critical habitat for Central California Coast (CCC) steelhead trout. In June 2005 NMFS proposed to include resident trout and landlocked steelhead in Alameda Creek as part of the Endangered Species Act-listed CCC steelhead trout population, based on compelling genetic evidence that landlocked populations of steelhead/rainbow trout in Calaveras and San Antonio Dams and resident rainbow trout in Alameda Creek are descendants of wild steelhead. However, due to political lobbying by the SFPUC, NMFS improperly separated Alameda Creek resident trout and landlocked steelhead from the listed population, which in turn resulted in NMFS in September 2005 excluding Alameda Creek from the final designated critical habitat for CCC steelhead.

The original critical habitat proposal was premised on the upper Alameda Creek watershed being occupied by resident fish that were part of the CCC steelhead ESU. NMFS has indicated it will consider Alameda Creek occupied by listed CCC steelhead trout when migration barriers in lower Alameda Creek are remediated. The Alameda Creek Alliance will be litigating and/or petitioning to a) list resident and landlocked trout populations in Alameda Creek as part of the Endangered Species Act-listed CCC steelhead trout population; and b) include Alameda Creek as part of designated critical habitat for CCC steelhead trout when migration barriers in lower Alameda Creek are remediated (scheduled for 2011).

Wildlife Surveys

The DEIR notes that on-site wildlife and fish surveys were conducted by consultants in June and October, with only two site visits, using meandering transects of the project area. It appears that no protocol level surveys for special-status species were conducted. June and October are not appropriate seasons to detect presence of amphibians, especially the California tiger salamander, which aestivates underground during the dry season and most of the year. The DEIR concludes

that Alameda Creek within the project area may not provide suitable breeding habitat for the California tiger salamander, but there is definitively nearby breeding habitat near or within the project area, based on the 6 documented occurrences of the species within a 1 mile radius of the project area. Rainy season protocol level surveys should be conducted to determine whether and where tiger salamanders are breeding in the Sunol Valley, where salamanders are dispersing to after breeding, and potential migration corridors. This information is needed to analyze potential impacts of the SVWTP project, and to configure the project to avoid destroying dispersal or occupied upland aestivation habitat, and to align proposed roads, heavy equipment operation, spoils placement, etc. to ensure there is no take of salamanders or disruption of their migration.

Mitigation Ratios

The DEIR proposes mitigating for biological impacts of the SVWTP project at a 1:1 ratio through three proposed compensation sites on SFPUC land: Portal Road Sycamore Restoration, Alameda Creek North Habitat Improvement, and Goatrock Grassland Preservation. Where are these sites located? The DEIR should describe the location of these sites and include a location map. The DEIR should describe the topography, vegetation, existing land use, current habitat value for special-status species, current management regime, and potential for habitat restoration for listed species at these sites. The DEIR does not adequately describe the mitigation value of these lands.

There is a fundamental problem with proposing mitigation for biological impacts on public land already owned by the SFPUC. These lands are under no threat of development, already owned by the public, and presumably are being managed in accordance with the SFPUC's Environmental Stewardship Policy as protected watershed lands. If they are not being managed in this manner, using these lands as mitigation banks rewards the SFPUC for bad management policies and contributes no net benefit to special-status species. Management of SFPUC properties in accordance with the Environmental Stewardship Policy should not be considered mitigation for project impacts. To provide meaningful benefits, mitigation should consist of protecting privately owned lands under threat of development with habitat value for special status-species, at a 1:1 ratio.

Presumably the SFPUC mitigation lands are disturbed areas that could benefit from habitat restoration, invasive plant removal, management changes, and/or species reintroduction. The mitigation ratios for using these types of mitigation banks should be much higher to provide real conservation and ecosystem benefits. These lands are mitigating for disturbance for areas known to harbor special-status species. If degraded public lands are enhanced as compensation for permanent impacts from the SVWTP project, the mitigation ratio should be 3:1.

The DEIR needs to describe how the SFPUC will ensure mitigation lands will be managed for special-status species habitat and ecosystem values in perpetuity. The DEIR should describe the dedicated funding and monitoring program and who will be responsible for ensuring this outcome.

Spoils Piles

The DEIR states that spoils piles will be preferentially placed at nursery areas 1 and 2, near Alameda Creek. The spoils will consist of 406,000 cubic yards of material. The DEIR fails to discuss how this material will be prevented from eroding during flood or runoff events and getting into the creek. The project must ensure that none of this sediment enters Alameda Creek, which is habitat for special-status fish and amphibian species. Any transport of sediment to the creek would be a significant impact.

The DEIR states that the edge of the spoils piles at the nursery sites will be set back 200 feet from the centerline of Alameda Creek (p. 4.15-14), but elsewhere states it is 200 feet from the base of the spoils piles – which is it? If it is 200 feet from the center of the piles, how close will the edge of the spoils piles be to the creek?

Toxic Chemicals

The SFPUC had a disastrous chlorine spill at the SVWTP in April of 2002, which killed all fish and aquatic life in Alameda Creek within a reach extending downstream of the SVWTP about 1,000 yards. In May 2002 the SFPUC had another discharge of chlorinated water from the SVWTP. No restoration or mitigation was ever done by the SFPUC to remediate the impacts of these chemical spills.

The SVWTP project includes installation of a new 3.5 million-gallon chlorine contact tank, a new chemical feed facility, a 10,000-gallon ammonia storage tank (with 50 to 400 gallons of ammonia used each day), two 13,000-gallon sodium hypochlorite tanks, two 5,000-gallon fluoride tanks (with 55 to 450 gallons of fluoride used each day), two diesel storage tanks of 11,000 gallons capacity, and a chemical truck unloading station adjacent to Alameda Creek.

Given the SFPUC's track record with chemical spills, we are very concerned about the storage and use of such massive quantities of toxic chemicals adjacent to sensitive fish and wildlife habitat in Alameda Creek. We asked in our scoping comments that the environmental review for the SVWTP project discuss in detail the fail-safe measures the SFPUC will implement at the SVWTP to ensure there is never another chemical spill into Alameda Creek. The DEIR should detail what fail-safe operation protocols will be used, and the chemical containment procedures, spill response, and mitigation measures that will be in place if a chemical spill does occur. Will the SVWTP have secondary containment around chemical storage tanks, feed facility and unloading station? How will chemicals be contained in the event of an earthquake?

The DEIR does mention a Spill Prevention and Countermeasure Plan (SPCP) that is supposedly in accordance with EPA regulations. This plan should be described in the DEIR. The SPCP apparently only covers diesel storage. What about a SPCP for chlorine, ammonia, sodium hypochlorite and fluoride? Is this plan adequate to prevent chemical spills into Alameda Creek?

The environmental site assessment conducted for the DEIR mentions an apparently illegal chemical sludge disposal area used by the SFPUC until the 1990s north of the SVWTP, contaminated with PCBs and copper. The assessment concludes there is minimal risk to workers but the DEIR does not evaluate the potential risk to wildlife. This area should be cleaned up and fully remediated as part of the SVWTP project.

Pesticides

The environmental site assessment conducted for the DEIR mentions some of the pesticide use by nurseries under lease by the SFPUC within the project area, concluding that pesticides have likely accumulated in the soil. This area should be cleaned up and fully remediated as part of the SVWTP project.

The assessment notes the use of chlorothalonil by the Valley Crest Tree Nursery on SFPUC property within the project area. Chlorothalonil is an organochlorine fungicide that is highly toxic to fish and aquatic vertebrates and invertebrates. Chlorothalonil suspends to organic matter once in water and is slow to biodegrade in still waters, posing a risk to fish and their habitat.

Chlorothalonil is persistent in soils and is also acutely toxic to frogs. Long term chlorothalonil exposure in mammals can result in cancer and damage to skin, eyes and kidneys. The U.S. Environmental Protection Agency (EPA) has determined that registered uses of chlorothalonil “may adversely affect endangered species of birds (chronically), mammals (chronically), freshwater fish (acutely and chronically), freshwater invertebrates (acutely) and aquatic plants.”

Use of chlorothalonil adjacent to red-legged frog habitats is illegal – this use adjacent to Alameda Creek may violate state and federal law. It is illegal under the federal Endangered Species Act and under the EPA and state of California’s pesticide registration program to use chlorothalonil within and adjacent to red-legged frog habitats, specifically designated critical habitat areas, or aquatic features and upland habitats occupied by the red-legged frog in Alameda County; including within an additional pesticide-free buffer zone adjoining frog habitats (of 200 feet for aerial pesticide applications to prevent drift and 60 feet for ground applications to prevent runoff). See the California Department of Pesticide Regulation (CDPR) publication, [*Protection of California Red-legged Frog from Pesticides*](#). The SFPUC should determine the extent of chlorothalonil use, the proximity to Alameda Creek, the application method, and if necessary, issue a cease and desist order to Valley Crest Tree Nursery to prevent any illegal and harmful use of chlorothalonil on SFPUC property and within the project area.

The ACA has repeatedly requested that the SFPUC inventory pesticide use at the Sunol Valley nurseries and restrict use of pesticides adjacent to Alameda Creek that are potentially harmful to aquatic wildlife. The SVWTP project should include an inventory of pesticides used at the Sunol Valley nurseries. The DEIR should include an analysis of the potential impacts to special-status species and aquatic life in Alameda Creek, and the SFPUC should prohibit a) illegal use of pesticides under restrictions by the EPA and CDPR; and b) pesticide use potentially harmful to special-status species and aquatic life in Alameda Creek.

Greenhouse Gasses

According to the DEIR, the SVWTP project will produce 7,400 metric tons of CO₂ equivalent greenhouse gasses during the construction period, and project operation will produce an estimated 355 tons of CO₂ equivalent greenhouse gasses per year. The DEIR concludes that since these emissions are minimal relative to state-wide emissions the proposed project would not conflict with state greenhouse gas reduction goals or result in substantial contribution to global climate change. The DEIR asserts that there is no methodology or threshold that can be applied to the significance of an individual project regarding greenhouse gas emissions. However, the DEIR’s greenhouse gas analysis is based on the flawed assumption that seemingly small contributions of greenhouse gases do not have a cumulative impact on global warming.

The EIR incorrectly reasons that because the SVWTP project’s construction and operational emissions represent a small percentage of California’s total emissions, its cumulative impact is less than significant. Under CEQA, “[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible *on scientific and factual data*.” CEQA Guidelines § 15064(b) (emphasis added). Accordingly, a significance threshold for greenhouse gases must reflect the grave threats posed by the cumulative impact of additional new sources of emissions into an environment where deep reductions from existing emission levels are necessary to avert the worst consequences of global warming. *See Communities for Better Env’t v. California Resources Agency*, 103 Cal. App. 4th 98, 120 (2002) (“the greater the existing environmental problems are, the lower the threshold for treating a project’s contribution to cumulative impacts as significant.”); *see also Center for Biological Diversity v. National Highway Traffic Safety Administration*, 508 F.3d 508, 550 (9th Cir. 2007) (“we cannot afford to ignore even modest

contributions to global warming.”). The more new emissions are added to the atmosphere, the more difficult it will be to attain the emission reduction targets required to minimize the risk of dangerous climate change. Given the deep emission cuts necessary to stabilize the climate, a net zero threshold is the most scientifically supportable threshold for greenhouse gas emissions.

Based on the severe impacts already observed as well as future impacts and risks posed by additional warming to which we are committed due to inertia in the climate system, climatologists are increasingly concluded that current climate conditions already constitute “dangerous” climate change and that greenhouse gas emissions ultimately must be drawn down to net negative levels through the rapid phase-out of coal and improved forest and agricultural management.¹ Atmospheric concentrations of CO₂ have risen from a pre-industrial concentration of 280 ppm to 383 ppm in 2007.² Annual mean global temperature has increased by 0.76°C relative to pre-industrial times and is increasing at a rate of 0.17°C/decade.³ Impacts from this anthropogenic interference with the climate has already resulted in tens of thousands of climate-related deaths, species extinction, ocean acidification and loss of coral reefs, and the significant retreat of glaciers and sea ice. In addition to the impacts already observed, additional warming “in the pipeline” due to inertia in the climate system and their feedback loops will result in further increases in temperature posing significant risks of severe and irreversible impacts.⁴ The climate is locked into anywhere from 0.3 to 0.7°C additional warming relative to late 20th century levels due to the eventual impacts of past historical emissions.⁵ On account of additional warming to which we are committed, Ramanathan and Feng found that there is a “high probability that the [dangerous anthropogenic interference] threshold is already in our rearview mirror.”⁶ Similarly, on the basis of paleoclimate evidence and ongoing climate change, James Hansen and other leading climate scientists concluded the present CO₂ levels of 385 ppm are “already in the dangerous zone” and that “[i]f humanity wishes to preserve a planet similar to that on which civilization developed and to which life on Earth is adapted, paleoclimate evidence and ongoing climate change suggest that CO₂ will need to be reduced from its current 385 ppm to at most 350 ppm, but likely less than that.”⁷ In looking at dangerous climate change through the lens of risk tolerance, Harvey concluded that, at a 10% risk tolerance, atmospheric CO₂ concentrations close to present levels “violates the UNFCCC” for a range of assumptions of climate sensitivity.⁸ Accordingly, as the climate change to which we are committed is already dangerous, there is little scientific basis to conclude that any new source of emissions is innocuous.

¹ James Hansen et al., *Target Atmospheric CO₂: Where Should Humanity Aim?* 2 OPEN ATMOSPHERIC SCIENCE J. 217, 226-27 (2008); see also Matthews H.D. & Caldeira, K., *Stabilizing the Climate Requires Near-Zero Emissions*, 35 GEOPHYSICAL RESEARCH LETTERS L04705 (2008) (“future anthropogenic emissions would need to be eliminated in order to stabilize global-mean temperature.”).

² Global Carbon Project, *Carbon Budget and Trends 2007* (2008), available at: <http://www.globalcarbonproject.org/carbontrends/index.htm>.

³ Kevin E. Trenberth et al., *2007: Observations: Surface and Atmospheric Climate Change in CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS, CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE 252* (Susan Solomon et al. eds., Cambridge Univ. Press 2007).

⁴ V. Ramanathan & Y. Feng, *On Avoiding Dangerous Anthropogenic Interference With the Climate System: Formidable Challenges Ahead*, 105 PNAS 14245, 14249 (Sept. 23, 2008); James Hansen et al., *Target Atmospheric CO₂: Where Should Humanity Aim?* 2 OPEN ATMOSPHERIC SCIENCE J. 217, 226 (2008).

⁵ Michael E. Mann, *Defining Dangerous Anthropogenic Interference*, 106 PNAS 4065, 4066 (Mar. 17, 2009).

⁶ V. Ramanathan & Y. Feng, *On Avoiding Dangerous Anthropogenic Interference With the Climate System: Formidable Challenges Ahead*, 105 PNAS 14245, 14249 (Sept. 23, 2008)

⁷ James Hansen et al., *Target Atmospheric CO₂: Where Should Humanity Aim?* 2 OPEN ATMOSPHERIC SCIENCE J. 217, 217-18 (2008).

⁸ Danny Harvey, *Dangerous Anthropogenic Interference, Dangerous Climatic Change, and Harmful Climatic Change: Non-Trivial Distinctions With Significant Policy Implications*, 82 CLIMATE CHANGE 1, 20 (2007).

Based on the abundant scientific evidence that *any* increase in greenhouse gas emissions has a cumulatively significant impact on the environment, there is a “fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect.” *Protect the Historic Amador Waterways v. Amador Water Agency*, 116 Cal. App. 4th 1099, 1109 (2004). Accordingly, the EIR should properly recognize that the Project’s greenhouse gas impacts are cumulatively significant and adopt all feasible mitigation and alternatives to reduce Project emissions.

The DEIR mentions San Francisco’s Climate Action Plan and the City’s greenhouse gas reduction goal of 20% by 2012. The SFPUC, as a San Francisco City agency, should be leading the way in greenhouse gas reduction measures and mitigation for greenhouse gas impacts for each and every one of the SFPUC’s projects. The cumulative impacts to the climate due to all of the SFPUC’s proposed projects under the Water System Improvement Program should be reduced as much as possible and mitigated to the fullest extent.

However, the DEIR contains token greenhouse gas reduction measures such as maintaining tire inflation pressure on construction vehicles. The DEIR should include full mitigation for all the CO₂ equivalent greenhouse gasses produced during the construction period and project operation, through purchase of offsets for 100% of the emissions from a fund or project certified by the California Climate Action Registry.

Green Building

The SVWTP should be a state of the art green building. There is no reason the SFPUC should construct new buildings that are not state of the art green buildings. The DEIR notes that the SFPUC will “attempt” to maximize energy efficiency at the new SVWTP by exceeding Title 24 minimum requirements by at least 20 percent, and exceeding the LEED silver certification required by San Francisco’s Green Building Ordinance. The SVWTP building should be designed to demonstrate the SFPUC’s commitment to energy efficiency and conservation, and should include high efficiency lighting, passive and active solar, low flow water for toilets and other plumbing, impervious paving, a green roof, energy efficient appliances, stormwater retention and treatment, non-toxic materials, and sustainably harvested materials.

Water Discharges

The DEIR discusses water discharges from the SVWTP wash water recovery basin that will occur every 5 years, consisting of up to 41,000 gallons of water. These discharges need to be timed to avoid impacts in Alameda Creek to spawning or rearing fish or amphibians. The flows should be spread out as much as possible and ramped up and down consistent with natural runoff in the creek. The potential to time these releases to provide benefits for wildlife habitat, such as outmigration flows for anadromous fish, should be discussed and explored.

Other Impacts

The DEIR mentions 16 coast live oak trees that will be removed, including potential nesting trees for bird. It is not clear what the mitigation for this impact is.

The DEIR discusses Impact BIO-13 on a perennial spring wetland. The SVWTP will directly impact 0.04 acre of this wetland, but the DEIR concludes the entire spring will be impacted and will entirely dry up as a result of the project. The mitigation for this impact should include mitigation for the full acreage of the spring wetland.

cc: Chris Kern, San Francisco Planning Department
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