

## AGREEMENT TO IMPLEMENT MITIGATION MONITORING AND REPORTING PROGRAM

<i>Record No.:</i>	<b>2024-005910ENV</b>	<i>Project Sponsor:</i>	San Francisco International Airport
<i>Project Title:</i>	<b>12 kV Power Distribution Replacement</b>		Audrey Park, 650.821.6678, <a href="mailto:audrey.park@flysfo.com">audrey.park@flysfo.com</a>
<i>Project Site:</i>	Portions of San Francisco International Airport’s West of Bayshore property and the Airport area east of U.S. Highway 101	<i>Lead Agency:</i>	San Francisco Planning Department
		<i>Staff Contact:</i>	Don Lewis, 628.652.7543, <a href="mailto:don.lewis@sfgov.org">don.lewis@sfgov.org</a>

The table below indicates when compliance with each mitigation measure must occur. Some mitigation measures span multiple phases. Substantive descriptions of each mitigation measure’s requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program.

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Construction*	During Construction**	Post-construction or Operational	
Mitigation Measure M-BI-1a: Crotch’s Bumble Bee Protection Measures	X	X		
Mitigation Measure M-BI-1b: San Francisco Garter Snake and California Red-Legged Frog Protection Measures	X	X		
Mitigation Measure M-BI-1c: Nesting Bird Protection Measures	X	X		
Mitigation Measure M-BI-3: Compensation for Fill of Wetlands	X			

NOTES:  
 \* Prior to any ground disturbing activities at the project site.  
 \*\* Construction is broadly defined to include any physical activities associated with construction of a development project including, but not limited to site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction.

Note to sponsor: Please contact [CPC.EnvironmentalMonitoring@sfgov.org](mailto:CPC.EnvironmentalMonitoring@sfgov.org) to begin the environmental monitoring process upon award of construction contract. In addition to the mitigation measures in this Mitigation Monitoring and Reporting Program, San Francisco International Airport’s (SFO) standard construction measures are required to be implemented.

## MITIGATION MONITORING AND REPORTING PROGRAM

Monitoring and Reporting Program <sup>a</sup>				
Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<b>MITIGATION MEASURES AGREED TO BY SFO</b>				
<b>Biological Resources</b>				
<p><b>Mitigation Measure M-BI-1a: Crotch’s Bumble Bee Protection Measures.</b> No more than 30 days prior to construction, a qualified biologist with expertise in bees shall conduct a Crotch’s bumble bee survey in suitable nesting, foraging, and overwintering habitat areas that may be impacted by project construction, and areas within 100 feet. A minimum of three surveys shall be conducted over a three-day period within a temperature range of 15°C and 30°C between March 1 and October 31 following the guidance outlined in the California Bumble Bee Atlas.<sup>1,2</sup> If an active nest is identified, a 45-foot no-disturbance buffer shall be established to reduce the risk of accidental take. If a no-disturbance buffer cannot be maintained, SFO shall seek take coverage for this species under the California Endangered Species Act.</p>	SFO, qualified biologist, CDFW (as necessary)	Pre-construction surveys over a three-day period between March 1 and October 31, no more than 30 days prior to construction	Qualified biologist and SFO  Coordinate with CDFW as necessary if a no-disturbance buffer cannot be maintained	Ongoing during construction if active nests are observed  Considered complete at end of construction
<p><b>Mitigation Measure M-BI-1b: San Francisco Garter Snake and California Red-Legged Frog Protection Measures.</b> The following measures shall be implemented for the proposed project:</p> <p>a. <i>Environmental Awareness Training.</i> An approved [typically U.S. Fish and Wildlife Service– or California Department of Fish and Wildlife– approved] biologist shall present environmental awareness training to all employees before the start of work. The training shall include basic identification of SFGS and CRLF and a brief overview of each species’ life history and preferred habitats. Biologists also shall review the biological protection measures for the project. Workers shall be given a handout detailing the above information with photos of both</p>	SFO, approved (typically USFWS– or CDFW–approved) biologist	Prior to construction, conduct environmental awareness training for all employees  During construction, a hold pre-activity meetings immediately before the initiation of work	Approved biologist and SFO	Implementation of biological monitoring and preconstruction clearance surveys ongoing during construction  Considered complete at end of construction

<sup>1</sup> California Bumble Bee Atlas, Survey Protocols, <https://www.cabumblebeeatlas.org/habitat-surveys.html>.

<sup>2</sup> Note that the Crotch’s bumble bee survey window presented here is wider than the peak flying time for this species, March to June. This broad survey window provides flexibility to implement the 12 kV project later in the year in the face of other site limitations such as SFGS activity periods.

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p>species for identification. After the training, employees shall sign a training sign-in sheet to confirm that they understand the materials covered and the penalties for noncompliance.</p> <p>b. <i>Work Windows and Hours.</i> The general construction work period shall be August 15–November 1 in wetlands and March 1–October 31 in uplands. Hand-clearing of vegetation from work areas may occur year-round.</p> <p>c. <i>Property Access.</i> All entry gates to the WOB property shall be locked and access-restricted at all times and gates used for project-related access shall be locked during non-work hours. Signage on security fencing around entirety of property as an “Environmentally Sensitive Area” shall be maintained. All gates must be closed after entering or leaving the property. Motorized vehicles shall not exceed 5 miles per hour. All motorized vehicles shall be escorted whenever possible by a person walking in front of the vehicle and checking the route of travel for SFGS and CRLF.</p> <p>d. <i>Fire Prevention/General Safety.</i> All vehicles entering the site shall carry a functional fire extinguisher. No smoking, firearms (other than firearms carried by authorized security personnel), campfires, or pets of project personnel shall be allowed anywhere on the WOB property.</p> <p>e. <i>Pre-activity Meeting.</i> A pre-activity meeting shall be held immediately before the initiation of work for all persons directly involved with implementation of the proposed activities on the WOB property. All conditions included in regulatory permits shall be reviewed and discussed. As part of the pre-activity meeting, a site visit shall be held to address and clarify any site-specific issues pertaining to activity implementation. A chain of command for field crews and other onsite personnel shall be established before the commencement of all activities.</p> <p>f. <i>Biological Monitoring.</i> For specific activities occurring on the WOB property, biological monitoring and preconstruction clearance surveys (described below) shall be required to ensure that adverse effects on SFGS and CRLF do not occur. The need for monitoring will depend on the type, extent, intensity, and duration of proposed activities. As the project proponent, SFO shall determine an appropriate level of biological monitoring for each proposed activity</p>		<p>for all persons directly involved with implementation of the proposed activities on the WOB property</p> <p>Implementation of biological monitoring and preconstruction clearance surveys ongoing during construction</p>		

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p>to ensure the protection of SFGS and CRLF. The monitoring approach may range from limited, part-time monitoring inspections to full-time monitoring by a team of multiple approved biologists. The following procedures and practices shall be implemented on an as-needed basis as determined by SFO’s approved biologist.</p> <ul style="list-style-type: none"> <li>– Approved biologists shall be established as the persons in charge of, and responsible for, all facets of project implementation. Approved biologists shall have full responsibility and authority for stopping work activities.</li> <li>– Approved biologists shall check for any reptiles or amphibians under any parked vehicles and equipment.</li> <li>– To maintain safety and limit any chance of take or habitat disturbance, a simple system of hand signals shall be established for the monitors, truck drivers, equipment operators, and field personnel to use during habitat enhancement and related activities.</li> <li>– Approved biologists shall have a cellular phone during activities on the WOB property.</li> </ul> <p>g. <i>Vegetation Removal.</i> Before the start of any ground-disturbing activities, ground-level vegetation that may provide cover for SFGS and CRLF shall be removed. Ground-level vegetation also will be removed from within existing roads to be used and within 3 feet of the edges of these roads before any road improvement work. The following procedures and practices shall be implemented during vegetation removal:</p> <ul style="list-style-type: none"> <li>– Immediately before vegetation removal, an approved biologist shall visually survey the area. Vegetation shall then be cut to a height of no less than 8 inches using hand tools (including string trimmers), and loose vegetation shall be removed to increase visibility. The approved biologist shall then conduct a second visual survey to ensure that no listed species are present. The remaining vegetation shall then be removed using hand tools and biologists shall hand-excavate small-mammal burrows as necessary before allowing equipment access to work areas.</li> </ul>				

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<ul style="list-style-type: none"> <li>- If SFGS or CRLF are identified during vegetation clearing, burrow excavation, or other activities, they shall be allowed to leave the work area of their own accord.</li> <li>- Shrub and understory vegetation removal shall be conducted using hand tools, including string trimmers and chainsaws, to minimize adverse impacts from mowers, excavators, and other heavy equipment. For larger shrubs, such as pampas grass, the vegetation around the base shall first be trimmed back, allowing an approved biologist to examine the plant and the surrounding area. Then, an excavator shall be used to remove the plant from its base, making minimal contact with the plant itself. The plant will then be shaken by its roots before being placed in the haul truck and inspected one more time by the approved biologist before removal from the site.</li> <li>- An approved biologist shall be present during all vegetation removal.</li> <li>- When large earthmoving equipment is in use, four biological monitors shall be present onsite for each piece of equipment.</li> <li>- All vegetation cleared from the site shall be loaded into trucks or containers and removed from the site the same day. All biomass generated from vegetation removal shall be placed directly into haul trucks; no stockpiling shall be permitted.</li> </ul> <p>h. <i>Wildlife Exclusion Fence.</i> The contractor shall install temporary wildlife exclusion fencing along the perimeter of work areas. Fencing shall be free of plastic or synthetic monofilament netting to avoid entanglement, trapping, or injury of SFGS and CRLF. Fencing shall not be trenched but instead shall be staked into the ground with loose materials piled at the base to fill any holes or gaps that SFGS may enter. Fencing should be inspected daily by the approved/designated biologist(s) to ensure it is maintained/functional and shall be repaired immediately where there are tears, gaps or damage. All construction areas not fenced, such as access roads, shall be clearly marked with flagging and monitored during construction to ensure that vehicles and equipment do not encroach into natural habitat. Any construction-related disturbance outside of these boundaries, including parking, temporary access, construction staging, or areas</p>				

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p>used for storage of materials, shall be prohibited without approval by SFO. Construction vehicles shall pass and turn around only within the delineated construction work area boundary or existing local road network. Where new access is required outside of existing roads or the construction work area, the route shall be clearly marked (i.e., flagged and/or staked) before being used, subject to review and approval of the approved biologist.</p> <p>i. <i>Weather Forecast.</i> Activities involving ground disturbance (i.e., vegetation clearing and contouring) shall be limited to periods of dry weather (less than 0.25 inch of precipitation per 24-hour period and less than a 40 percent chance of rain). Ground disturbance shall not be initiated if precipitation is forecast for the San Mateo Peninsula region. Activities shall cease 24 hours before a 40 percent or greater forecast of rain from the National Weather Service. Work may continue 24 hours after the rain ceases and there is no precipitation in the 24-hour forecast.</p> <p>j. <i>Work Area Definition.</i> The limits of work areas for ground-disturbing work shall be staked, flagged, or fenced to ensure that work and associated vehicle traffic are confined to designated areas.</p> <p>k. <i>Preconstruction Clearance Survey.</i> Up to 24 hours before the start of vegetation clearing or any ground-disturbing activities, an approved biologist shall search ground vegetation for SFGS and CRLF using a probing stick and/or bare hands. The approved biologist shall inspect the work area before the commencement of work to ensure that no SFGS or CRLF individuals are present.</p> <p>l. <i>Fueling of Equipment and Spill Response.</i> Fueling of equipment on the WOB property shall be conducted at least 65 feet from the boundary of wetland and riparian areas. Fueling shall be done using tarps or containers for spill containment. The containment tarp/container shall be set up under the equipment before refueling. Once the refueling is completed, the containment tarp/container and its contents shall be immediately removed from the property and all contaminants properly disposed of offsite. Standard operating procedures shall be implemented immediately in case of fuel spillage. All workers shall be informed of the importance of preventing spills and the appropriate measures to take should a spill occur. Spill kits</p>				

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p>shall be maintained onsite and will be immediately available in areas where refueling occurs.</p> <p>m. <i>Trash/Debris Removal.</i> During project activities, all trash shall be contained and removed from the site on a daily basis. All trash and construction-related debris shall be removed from the work areas after the end of construction each day.</p> <p>n. <i>Revegetation.</i> Although temporary impacts are not anticipated, after the completion of project activities, areas subject to temporary ground disturbance shall be returned to approximately pre-project grades and contours and shall be managed in accordance with SFO’s comprehensive vegetation management program.<sup>3</sup></p> <p>o. <i>Decontamination.</i> All vehicles, materials, and equipment, including construction equipment, brought to the site shall be certified as clean, and free of dirt and debris that could introduce pathogens (e.g., Snake Fungal Disease) or invasive weed seeds. To avoid introducing new aquatic diseases to the site (e.g., Ranavirus or chytrid fungus), workers who have direct contact with water shall either use new gear or decontaminate their waders or boots with a 10 percent bleach solution prior to contact.</p>				

<sup>3</sup> Environmental Science Associates, *Vegetation Management Plan for the San Francisco Garter Snake Recovery Action Plan, West of Bayshore Property, San Francisco International Airport* (RMP-2023-0003-R3), 2023, approved by CDFW on February 7, 2024.

Monitoring and Reporting Program <sup>a</sup>

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p><b>Mitigation Measure M-BI-1c: Nesting Bird Protection Measures.</b> Before any work conducted from February 15 to September 15, a qualified biologist with expertise in birds shall conduct a preconstruction survey to determine whether any birds are nesting in the work area. The survey shall include baseline monitoring of the nest to characterize normal bird behavior and determine a buffer distance which allows the birds to exhibit normal behavior. The preconstruction survey shall be conducted no earlier than seven days before the start of work from February 15 through May (because there is higher potential for birds to initiate nesting during this period), and no earlier than 15 days before the start of work from June through September 15. If active nests are found during the survey, the biologist shall determine an appropriately sized buffer around the nest in which no work would be allowed until the young have successfully fledged. The size of the nest buffer shall be determined by the qualified biologist, and would be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance. Considering these factors, typical nest buffers range in size from 250 feet for passerine birds, 500 feet for accipiters, and 1,000 feet for buteos. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active.</p>	<p>SFO and qualified biologist</p>	<p>Before any work conducted from February 15 to September 15, conduct a preconstruction survey no earlier than seven days before the start of work from February 15 through May, and no earlier than 15 days before the start of work from June through September 15</p> <p>Implementation ongoing during construction if active nests are observed</p>	<p>Qualified biologist and SFO</p>	<p>Ongoing during construction if active nests are observed</p> <p>Considered complete at end of construction</p>



**Monitoring and Reporting Program <sup>a</sup>**

Adopted Mitigation Measure	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
<p><b>Mitigation Measure M-BI-3: Compensation for Fill of Wetlands.</b> The Airport shall provide compensatory mitigation for placement of fill associated with installation of new access pads, as further determined by the regulatory agencies with authority over these features during the permitting process. At a minimum, SFO shall provide compensatory mitigation for the permanent loss of wetlands at a 1:1 ratio (mitigation: impact), or as determined through coordination and permitting efforts with the regulatory agencies. Compensatory mitigation shall meet and be consistent with 14 CFR § 139.337, Wildlife Hazard Management, and associated FAA wildlife hazard advisory circulars. All details regarding mitigation shall be determined through coordination with the regulatory agencies that require compensatory mitigation. If onsite compensatory mitigation is proposed, these onsite activities would be authorized through existing CEQA compliance and RAP regulatory permits.</p>	<p>SFO, regulatory agencies with permitting authority</p>	<p>Prior to construction</p>	<p>SFO and regulatory agencies with permitting authority</p>	<p>Considered complete when fill-related permits are issued and compensatory mitigation accepted by regulatory agencies</p>

NOTES:

a. Definitions of MMRP Column Headings:

- *Adopted Mitigation Measures:* Full text of the mitigation measure(s) copied verbatim from the final CEQA document.
- *Implementation Responsibility:* Entity who is responsible for implementing the mitigation measure. In most cases this is the project sponsor and/or project’s sponsor’s contractor/consultant and at times under the direction of the planning department.
- *Mitigation Schedule:* Identifies milestones for when the actions in the mitigation measure need to be implemented.
- *Monitoring/Reporting Responsibility:* Identifies who is responsible for monitoring compliance with the mitigation measure and any reporting responsibilities. In most cases it is the Planning Department who is responsible for monitoring compliance with the mitigation measure. If a department or agency other than the planning department is identified as responsible for monitoring, there should be an expressed agreement between the planning department and that other department/agency. In most cases the project sponsor, their contractor, or consultant are responsible for any reporting requirements.
- *Monitoring Actions/Completion Criteria:* Identifies the milestone at which the mitigation measure is considered complete. This may also identify requirements for verifying compliance.

INTENTIONALLY BLANK