



**San Francisco**  
**Water Power Sewer**  
 Operator of the Hetch Hetchy Regional Water System  
 January 16, 2015

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Comm. Dev. Dept. Brisbane

ATTACHMENT I

Natural Resources and Lands Management Division  
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 San Francisco, CA 94102  
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John Swiecki, Director  
 Brisbane Community Development Department  
 50 Park Place  
 Brisbane, CA 94005

RE: 2015-2022 Housing Element (General Plan Amendment GPA-1-14) Initial Study/Negative Declaration

Dear Mr. John Swiecki:

Thank you for the opportunity to review and comment on the Initial Study/Negative Declaration for the 2015-2022 Housing Element (General Plan Amendment GPA-1-14).

The SFPUC provides drinking water to 2.6 million people in the San Francisco Bay Area. The SFPUC holds land easements and operates water system infrastructure (owned by the City and County of San Francisco) in and adjacent to the City of Brisbane as part of the Hetch Hetchy Regional Water System. The Hetch Hetchy Regional Water System includes the Crystal Springs Pipelines #1 and #2 located in the City of Brisbane. Below are our comments relating to the Initial Study and Negative Declaration.

**Section X. Land Use and Planning**

The SFPUC understands that the purpose of the housing element update is to identify potential housing sites as part of state requirements. Currently, parts b. and c. of Section X state that "there are no direct physical impacts resulting from adoption of the Housing Elements, and all ensuing projects will require subsequent environmental review to determine if they cause such impacts."

As specified in the attached Right of Way (ROW) Policy, the SFPUC must retain the ability to access its property to maintain, repair, replace, or install water transmission pipelines. The SFPUC does not allow any structures and limits vegetation on its property because repair or maintenance of our water utility infrastructure may result in damage or demolition of built improvements and/or landscaping. Project sponsors of any proposed project over or near SFPUC easements should be made aware of the SFPUC's Right of Way requirements.

For example, the 2015-2022 Housing Element (Chapter 3) proposes that three parcels along Park Lane, which are currently developed and zoned as "Crocker Park Trade Commercial District," be rezoned as residential. The SFPUC holds an easement for its water transmission pipelines on or adjacent to the parcels proposed for rezoning to residential.

Services of the San Francisco Public Utilities Commission

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 General Manager



The City of Brisbane should consider the SFPUC infrastructure located next to these parcels and the potential land use conflict that the proposed housing sites on Park Lane may create relative to the land rights of the SFPUC through its easement and the established SFPUC plans and policies for managing its water utility rights of way. This land use conflict could potentially limit the suitability of using this commercial site for future residential projects.

To assist you in your planning efforts, below you will find the addresses and Assessor Parcel Numbers (APNs) for the potentially affected SFPUC easement through areas proposed for rezoning.

Address	Assessor Parcel Number (APN)
145 Park Lane, Brisbane, CA	005-190-100
105-115 Park Lane, Brisbane, CA	005-202-150
91-99 Park Lane, Brisbane, CA	005-202-200
Near Quarry Road, Brisbane, CA	005-260-470

If a residential development project is proposed to the City of Brisbane adjacent to or on SFPUC easement areas with water transmission pipelines and related infrastructure, the SFPUC requests that the project proponent participate in the SFPUC's Project Review process to comply with all applicable SFPUC plans and policies. For more information about our Project Review process and for instructions of how to participate, please visit our website at <http://www.sfwater.org/index.aspx?page=450>.

As noted in the Initial Study, the City of Brisbane purchases 100% of its potable water from the SFPUC. The ongoing operation and maintenance of the Hetch Hetchy Regional Water System in a safe and reliable manner is a shared high priority for both your community and the SFPUC. If you have any questions or require further information, please contact Jonathan Mendoza, Planner, at [jsmendoza@sfwater.org](mailto:jsmendoza@sfwater.org) or (650) 652-3215.

For your reference, I am enclosing the SFPUC ROW Policy and Integrated Vegetation Management Policy.

Sincerely,



Tim Ramirez  
Division Manager  
Natural Resources and Lands Management (NRLMD)

Enclosures: SFPUC Water Pipeline Right of Way Use Policy  
Right of Way Integrated Vegetation Management Policy

cc: Rosanna Russell, Director of Real Estate Services  
Joanne Wilson, Senior Land and Resources Planner (NRLMD)

## **SFPUC Water Pipeline Right of Way Use Policy for San Mateo, Santa Clara, and Alameda Counties**

As part of its utility system, the San Francisco Public Utilities Commission (SFPUC) operates and maintains hundreds of miles of water pipelines. The SFPUC provides for public use on its water pipeline property or right of way (ROW) throughout Alameda, Santa Clara, and San Mateo counties consistent with our existing plans and policies. The following controls will help inform how and in which instances the ROW can serve the needs of third parties—including public agencies, private parties, nonprofit organizations, and developers—seeking to provide recreational and other use opportunities to local communities.

Primarily, SFPUC land is used to deliver high quality, efficient and reliable water, power, and sewer services in a manner that is inclusive of environmental and community interests, and that sustains the resources entrusted to our care. The SFPUC's utmost priority is maintaining the safety and security of the pipelines that run underneath the ROW.

Through our formal Project Review and Land Use Application and Project Review process, we may permit a secondary use on the ROW if it benefits the SFPUC, is consistent with our mission and policies, and does not in any way interfere with, endanger, or damage the SFPUC's current or future operations, security or facilities.<sup>1</sup> No secondary use of SFPUC land is permitted without the SFPUC's consent.

These controls rely on and reference several existing SFPUC policies, which should be read when noted in the document. Being mindful of these policies while planning a proposed use and submitting an application will ease the process for both the applicant and the SFPUC. These controls are subject to change over time and additional requirements and restrictions may apply depending on the project.

The SFPUC typically issues five-year revocable licenses for use of our property, with a form of rent and insurance required upon signing.<sup>2</sup>

*Note: The project proponent is referred to as the "Applicant" until the license agreement is signed, at which point the project proponent is referred to as the "Licensee."*

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<sup>1</sup> SFPUC Guidelines for the Real Estate Services Division, Section 2.0.

<sup>2</sup> SFPUC Guidelines for the Real Estate Services Division, Section 3.3.

**I. Land Use, Structures, and Compliance with Law**

The following tenets govern the specifics of land use, structures, and accessibility for a project. Each proposal will still be subject to SFPUC approval on a case-by-case basis.

- A. SFPUC Policies. The Applicant's proposed use must conform to policies approved by the SFPUC's Commission, such as the SFPUC's Land Use Framework (<http://sfwater.org/index.aspx?page=586>).
- B. Americans with Disabilities Act Compliance. The Applicant must demonstrate that a Certified Access Specialist (CASp) has reviewed and approved its design and plans to confirm that they meet all applicable accessibility requirements.
- C. Environmental Regulations. The SFPUC's issuance of a revocable license for use of the ROW is subject to compliance with the California Environmental Quality Act (CEQA). The Applicant is responsible for assessing the potential environmental impacts under CEQA of its proposed use of the ROW. The SFPUC must be named as a Responsible Agency on any CEQA document prepared for the License Area. In addition, the Applicant shall provide to SFPUC a copy of the approved CEQA document prepared by the Applicant, the certification date, and documentation of the formal approval and adoption of CEQA findings by the CEQA lead agency. The SFPUC will not issue a license for the use of the ROW until CEQA review and approval is complete.
- D. Crossover and Other Reserved Rights. For a ROW parcel that bisects a third party's land, the Applicant's proposed use must not inhibit that party's ability to cross the ROW. The Applicant must demonstrate any adjoining owner with crossover or other reserved rights approves of the proposed use and that the use does not impinge on any reserved rights.
- E. Width. The License Area must span the entire width of the ROW.
- *For example, the SFPUC will not allow a 10-foot wide trail license on a ROW parcel that is 60 feet wide.*
- F. Structures. Structures on the ROW are generally prohibited. The Licensee shall not construct or place any structure or improvement in, on, under or about the entire License Area that requires excavation, bored footings or concrete pads that are greater than six inches deep.
- i. Structures such as benches and picnic tables that require shallow (four to six inches deep) cement pads or footings are generally permitted on the ROW. No such structure may be placed directly on top of a pipeline or within 20 feet of the edge of a pipeline.

ii. The SFPUC will determine the permitted weight of structures on a case-by-case basis.

- *When the SFPUC performs maintenance on its pipelines, structures of significant weight and/or those that require footings deeper than six inches are very difficult and time-consuming to move and can pose a safety hazard to the pipelines. The longer it takes the SFPUC to reach the pipeline in an emergency, the more damage that can occur.*

G. Paving Materials. Permitted trails or walkways should be paved with materials that both reduce erosion and stormwater runoff (e.g., permeable pavers).

H. License Area Boundary Marking. The License Area's boundaries should be clearly marked by landscaping or fencing, with the aim to prevent encroachments.

I. Fences and Gates. Any fence along the ROW boundary must be of chain-link or wooden construction with viewing access to the ROW. The fence must include a gate that allows SFPUC access to the ROW.<sup>3</sup> Any gate must be of chain-link construction and at least 12 feet wide with a minimum 6-foot vertical clearance.

## II. *Types of Recreational Use*

Based on our past experience and research, the SFPUC will allow simple parks without play structures, community gardens and limited trails.

A. Fulfilling an Open Space Requirement. An applicant may not use the ROW to fulfill a development's open space, setback, emergency access or other requirements.<sup>4</sup> In cases where a public agency has received consideration for use of SFPUC land from a third party, such as a developer, the SFPUC may allow such recreational use if the public agency applicant pays full Fair Market Rent.

B. Trail Segments. At this time, the SFPUC will consider trail proposals when a multi-jurisdictional entity presents a plan to incorporate specific ROW parcels into a fully connected trail. Licensed trail segments next to unlicensed parcels may create a trail corridor that poses liability to the SFPUC. The SFPUC will only consider trail proposals where the trail would not continue onto, or encourage entry onto, another ROW parcel without a trail and the trail otherwise meets all SFPUC license requirements.

## III. *Utilities*

A. Costs. The Licensee is responsible for all costs associated with use of utilities on the License Area.

<sup>3</sup> SFPUC Right of Way Requirements.

<sup>4</sup> SFPUC Guidelines for the Real Estate Services Division, Section 2.0.

- B. Placement. No utilities may be installed on the ROW running parallel to the SFPUC's pipelines, above or below grade.<sup>5</sup> With SFPUC approval, utilities may run perpendicular to the pipelines.
- C. Lights. The Licensee shall not install any light fixtures on the ROW that require electrical conduits running parallel to the pipelines. With SFPUC approval, conduits may run perpendicular to and/or across the pipelines.
- Any lighting shall have shielding to prevent spill over onto adjacent properties.
- D. Electricity. Licensees shall purchase all electricity from the SFPUC at the SFPUC's prevailing rates for comparable types of electrical load, so long as such electricity is reasonably available for the Licensee's needs.

#### IV. **Vegetation**

A. The Applicant shall refer to the SFPUC Integrated Vegetation Management Policy for the *minimum* requirements concerning types of vegetation and planting. (<http://www.sfwater.org/index.aspx?page=431>.) The Licensee is responsible for all vegetation maintenance and removal.

B. The Applicant shall submit a Planting Plan as part of its application.

*(Community garden applicants should refer to Section VII.C for separate instructions.)*

- i. The Planting Plan should include a layout of vegetation placement (grouped by hydrozone) and sources of irrigation, as well as a list of intended types of vegetation. The SFPUC will provide an area drawing including pipelines and facilities upon request.
- ii. The Applicant shall also identify the nursery(ies) supplying plant stock and provide evidence that each nursery supplier uses techniques to reduce the risk of plant pathogens, such as *Phytophthora ramorum*.

#### V. **Measures to Promote Water Efficiency<sup>6</sup>**

A. The Licensee shall maintain landscaping to ensure water use efficiency.

B. Plant Selection and Arrangement. The Licensee shall choose and arrange plants in a manner best suited to the site's climate, soil, sun exposure, wildfire susceptibility and other factors. Plants with similar water needs must be grouped within an area controlled by a single irrigation valve.

<sup>5</sup> SFPUC Land Engineering Requirements.

<sup>6</sup> SFPUC Rules and Regulations Governing Water Service to Customers, Section F.

- C. Turf. Turf is not allowed on slopes greater than 25 percent.
- D. Native Plant Species. The SFPUC encourages the use of local native plant species in order to reduce water use and promote wildlife habitat.
- E. Recycled Water. Irrigation systems shall use recycled water if recycled water meeting all public health codes and standards is available and will be available for the foreseeable future.
- F. Irrigation Water Runoff Prevention. For landscaped areas of any size, water runoff leaving the landscaped area due to low head drainage, overspray, broken irrigation hardware, or other similar conditions where water flows onto adjacent property, walks, roadways, parking lots, structures, or non-irrigated areas, is prohibited.

**VI. Other Requirements**

- A. Financial Stability. The SFPUC requires licensees to have a stable fiscal history.
  - Applicants must also demonstrate sufficient financial backing to pay rent, maintain the License Area, and fulfill other license obligations over the license term.
- B. Smaller, community-based organizations without 501(c)(3) classifications must partner with a 501(c)(3) classified organization or any other entity through which it can secure funding for the License Area over the license term.
- C. Maintenance. The Licensee must maintain the License Area in a clean and slightly condition at its sole cost.<sup>7</sup> Maintenance includes, but is not limited to, regular weed abatement, mowing, and removing graffiti, dumping, and trash.
- D. Mitigation and Restoration. The Licensee will be responsible, at its sole cost, for removing and replacing any recreational improvements in order to accommodate planned or emergency maintenance, repairs, replacements, or projects done by or on behalf of the SFPUC. If the Licensee refuses to remove its improvements, SFPUC will remove the improvements at the Licensee's sole expense without any obligation to replace them.
- E. Encroachments. The Licensee will be solely responsible for removing any encroachments on the License Area. An encroachment is any improvement on SFPUC property not approved by the SFPUC. Please read the SFPUC ROW Encroachment Policy for specific requirements. If the Licensee fails to remove encroachments, the SFPUC will remove them at Licensee's sole expense. The Licensee must regularly patrol the License Area to spot encroachments and remove them at an early stage.

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<sup>7</sup> SFPUC Framework for Land Management and Use.

F. Point of Contact. The Licensee will identify a point of contact (name, position title, phone number, and address) to serve as the liaison between the Licensee, the local community, and the SFPUC regarding the License Agreement and the License Area. In the event that the point of contact changes, the Licensee shall immediately provide the SFPUC with the new contact information. Once the License Term commences, the point of contact shall inform local community members to direct any maintenance requests to him or her. In the event that local community members contact the SFPUC with such requests, the SFPUC will redirect any requests or complaints to the point of contact.

G. Community Outreach.

i. Following an initial intake conversation with the SFPUC, the Applicant shall provide a Community Outreach Plan for SFPUC approval. This Plan shall include the following information:

1. Identification of key stakeholders whom the Applicant will contact and/or ask for input, along with their contact information;
2. A description of the Applicant's outreach strategy, tactics, and materials;
3. A timeline of outreach (emails/letters mailing date, meetings, etc.); and
4. A description of how the Applicant will incorporate feedback into its proposal.

ii. The Applicant shall conduct outreach for the project at its sole cost and shall keep the SFPUC apprised of any issues arising during outreach.

iii. During outreach, the Applicant shall indicate that it in no way represents the SFPUC.

H. Signage. The SFPUC will provide, at Licensee's cost, a small sign featuring the SFPUC logo and text indicating SFPUC ownership of the License Area at each entrance. In addition, the Licensee will install, at its sole cost, an accompanying sign at each entrance to the License Area notifying visitors to contact the organization's point of contact and provide a current telephone number in case visitors have any issues. The SFPUC must approve the design and placement of the Licensee's sign(s).



## **VII. Community Gardens**

In addition to the foregoing requirements, the following requirements apply to community garden sites. As with all projects, the details of the operation of a particular community garden are approved on a case-by-case basis.

- A. The Applicant must demonstrate stable funding. The Applicant must provide information about grants received, pending grants, and any ongoing foundational support.
- B. The Applicant must have an established history and experience in managing urban agriculture or community gardening projects. Alternatively, the Applicant may demonstrate a formal partnership with an organization or agency with an established history and experience in managing urban agriculture or community gardening projects
- C. During the Project Review process, the Applicant shall submit a Community Garden Planting Plan that depicts the proposed License Area with individual plot and planter box placements, landscaping, and a general list of crops that may be grown in the garden.
- D. The Applicant shall designate a Garden Manager to oversee day-to-day needs and serve as a liaison between the SFPUC and garden plot holders. The Garden Manager may be distinct from the point of contact, see Section VI.F.
- E. The Licensee must ensure that the Garden Manager informs plot holders about the potential for and responsibilities related to SFPUC repairs or emergency maintenance on the License Area. In such circumstances, the SFPUC is not liable for the removal and replacement of any features on the License Area or the costs associated with such removal and replacement.
- F. The Licensee must conduct all gardening within planter boxes with attached bottoms that allow for easy removal without damaging the crops.



**AMENDMENT TO  
 RIGHT OF WAY INTEGRATED VEGETATION MANAGEMENT POLICY  
 Updated November 18, 2014**

**12.000 RIGHT OF WAY INTEGRATED VEGETATION MANAGEMENT  
 POLICY**

**12.001 General**

The San Francisco Public Utilities Commission ("SFPUC") is responsible for the delivery of potable water and the collection and treatment of wastewater for some 800,000 customers within the City of San Francisco; it is also responsible for the delivery of potable water to 26 other water retailers with a customer base of 1.8 million. **The following policy is established to manage vegetation on the transmission, distribution and collection systems within the SFPUC Right of Way ("ROW") so that it does not pose a threat or hazard to the system's integrity and infrastructure or impede utility maintenance and operations.**

The existence of large woody vegetation<sup>1</sup>, hereinafter referred to as vegetation, and water transmission lines within the ROW are not compatible and, in fact, are mutually exclusive uses of the same space. Roots can impact transmission pipelines by causing corrosion. The existence of trees and other vegetation directly adjacent to pipelines makes emergency and annual maintenance very difficult, hazardous, and expensive, and increases concerns for public safety. The risk of fire within the ROW is always a concern and the reduction of fire ladder fuels within these corridors is another reason to modify the vegetation mosaic. In addition to managing vegetation in a timely manner to prevent any disruption in utility service, the SFPUC also manages vegetation on its ROW to comply with local fire ordinances enacted to protect public safety.

One of the other objectives of this policy is to reduce and eliminate as much as practicable the use of herbicides on vegetation within the ROW and to implement integrated pest management (IPM).

**12.002 Woody Vegetation Management**

**1.0 Vegetation of any size or species will not be allowed to grow within certain critical portions of the ROW, pumping stations or other facilities as**

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General Manager

<sup>1</sup> Woody vegetation is defined as all brush, tree and ornamental shrub species planted in (or naturally occurring in) the native soil having a woody stem that at maturity exceeds 3 inches in diameter.



determined by a SFPUC qualified professional, and generally in accordance with the following guidelines.

### 1.1 Emergency Removal

SFPUC Management reserves the right to remove any vegetation without prior public notification that has been assessed by a SFPUC qualified professional as an immediate threat to transmission lines or other utility infrastructure, human life and property due to acts of God, insects, disease, or natural mortality.

### 1.2 Priority Removal

Vegetation that is within 15 feet of the edge of any pipe will be removed and the vegetative debris will be cut into short lengths and chipped whenever possible. Chips will be spread upon the site where the vegetation was removed. Material that cannot be chipped will be hauled away to a proper disposal site.

If vegetation along the ROW is grouped in contiguous stands<sup>2</sup>, or populations, a systematic and staggered removal of that vegetation will be undertaken to replicate a natural appearance. Initial removal<sup>3</sup> will be vegetation immediately above or within 15 feet of the pipeline edges; secondary vegetation<sup>4</sup> within 15 to 25 feet from pipelines will then be removed.

### 1.3 Standard Removal

Vegetation that is more than 25 feet from the edge of a pipeline and up to the boundary of the ROW will be assessed by a SFPUC qualified professional for its age and condition, fire risk, and potential impact to the pipelines. Based on this assessment, the vegetation will be removed or retained.

### 1.4 Removal Standards

Each Operating Division will develop its own set of guidelines or follow established requirements in accordance with local needs.

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<sup>2</sup> A stand is defined as a community of trees possessing sufficient uniformity in composition, structure, age, arrangement, or condition to be distinguishable from adjacent forest communities to form a management unit.

<sup>3</sup> Initial removal is defined as the vegetation removed during the base year or first year of cutting

<sup>4</sup> Secondary vegetation is defined as the vegetative growth during the second year following the base year for cutting.

2.0 All stems of vegetation will be cut flush with the ground and where deemed necessary or appropriate, roots will be removed. All trees identified for removal will be clearly marked with paint and/or a numbered aluminum tag.

3.0 Sprouting species of vegetation will be treated with herbicides where practicable, adhering to provisions of Chapter 3 of the San Francisco Environment Code.

4.0 Erosion control measures, where needed, will be completed before the work crew or contractors leave the work site or before October 15 of the calendar year.

5.0 Department personnel will remove in a timely manner any and all material that has been cut for maintenance purposes within any stream channel.

6.0 All vegetation removal work and consultation on vegetation retention will be reviewed and supervised by a SFPUC qualified professional. All vegetation removal work and/or treatment will be made on a case-by-case basis by a SFPUC qualified professional.

7.0 Notification process for areas of significant resource impact that are beyond regular and ongoing maintenance:

7.1 County/City Notification – The individual Operating Division will have sent to the affected county/city a map showing the sections of the ROW which will be worked, a written description of the work to be done, the appropriate removal time for the work crews, and a contact person for more information. This should be done approximately 10 days prior to start of work. Each Operating Division will develop its own set of guidelines in accordance with local need.

7.2 Public Notification – The Operating Division will have notices posted at areas where the vegetation is to be removed with the same information as above also approximately 10 days prior to removal. Notices will also be sent to all property owners within 300 feet of the removal site. Posted notices will be 11- by 17-inches in size on colored paper and will be put up at each end of the project area and at crossover points through the ROW. Questions and complaints from the public will be handled through a designated contact person. Each Operating Division will develop its own set of guidelines in accordance with local needs.

### 12.003 Annual Grass and Weed Management

Annual grasses and weeds will be mowed, disked, sprayed or mulched along the ROW as appropriate to reduce vegetation and potential fire danger annually. This treatment should be completed before July 30 of each year. This date is targeted to allow the grasses, forbs and weeds to reach maturity and facilitate control for the season.

### 12.004 Segments of ROW that are covered by Agricultural deed rights

The only vegetation that may be planted within the ROW on those segments where an adjacent owner has Deeded Agricultural Rights will be: non-woody herbaceous plants such as grasses, flowers, bulbs, or vegetables.

### 12.005 Segments of ROW that are managed and maintained under a Lease or License

Special allowance may be made for these types of areas, as the vegetation will be maintained by the licensed user as per agreement with the City, and not allowed to grow unchecked. Only shallow rooted plants may be planted directly above the pipelines.

Within the above segments, the cost of vegetation maintenance and removal will be borne by the tenant or licensee exclusively. In a like fashion, when new vegetative encroachments are discovered they will be assessed by a SFPUC qualified professional on a case-by-case basis and either be permitted or proposed for removal.

The following is a guideline for the size at maturity of plants (small trees, shrubs, and groundcover) that may be permitted to be used as landscape materials. Note: All distance measurements are for mature trees and plants measured from the edge of the drip-line to the edge of the pipeline.

- Plants that may be permitted to be planted directly above existing and future pipelines: shallow rooted plants such as ground cover, grasses, flowers, and very low growing plants that grow to a maximum of one foot in height at maturity.
- Plants that may be permitted to be planted 15–25 feet from the edge of existing and future pipelines: shrubs and plants that grow to a maximum of five feet in height at maturity.

- Plants that may be permitted to be planted 25 feet or more from the edge of existing and future pipelines: small trees or shrubs that grow to a maximum of twenty feet in height and fifteen feet in canopy width.

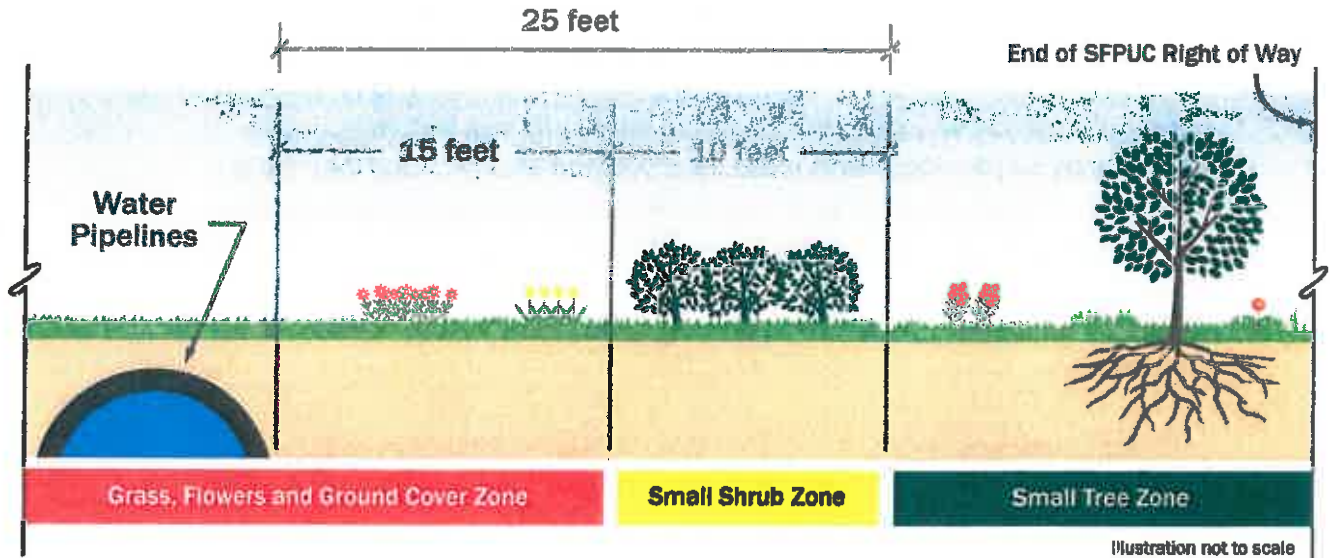
Trees and plants that exceed the maximum height and size limit (described above) may be permitted within a leased or licensed area provided they are in containers and are above ground. Container load and placement location(s) are subject to review and approval by the SFPUC.

Low water use plant species are encouraged and invasive plant species are not allowed.

All appurtenances, vaults, and facility infrastructure must remain visible and accessible at all times. All determinations of species acceptability will be made by a SFPUC qualified professional.

**The above policy is for general application and for internal administration purposes only and may not be relied upon by any third party for any reason whatsoever. The SFPUC reserves the right at its sole discretion, to establish stricter policies in any particular situation and to revise and update the above policy at any time.**

# Right Of Way (ROW) Landscape Vegetation Guidelines



The following vegetation types are permitted on the ROW within the appropriate zones.

**Plantings that may be permitted directly above existing and future pipelines:**

Ground cover, grasses, flowers, and very low growing plants that reach no more than one foot in height at maturity.



**Plantings that may be permitted 15–25 feet from the edge of existing and future pipelines:**

Shrubs and plants that grow no more than five feet tall in height at maturity.



**Plantings that may be permitted 25 feet or more from the edge of existing and future pipelines:**

Small trees or shrubs that grow to a maximum of twenty feet in height and fifteen feet in canopy width or less.

