

The following excerpts from the Public Works Procedures Manual (as of February 2024) address the requirements of the California Environmental Quality Act Guidelines at 15097 “MITIGATION MONITORING OR REPORTING”:

*In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects...*

*At its discretion, an agency may adopt standardized policies and requirements to guide individually adopted monitoring or reporting programs. Standardized policies and requirements may describe, but are not limited to: (1) The relative responsibilities of various departments within the agency for various aspects of monitoring or reporting, including lead responsibility for administering typical programs and support responsibilities. (2) The responsibilities of the project proponent. (3) Agency guidelines for preparing monitoring or reporting programs. (4) General standards for determining project compliance with the mitigation measures or revisions and related conditions of approval. (5) Enforcement procedures for noncompliance, including provisions for administrative appeal. (6) Process for informing staff and decision makers of the relative success of mitigation measures and using those results to improve future mitigation measures.*

**Volume**

09 Project Management Manual

**Chapter**

09-03-0 Project Management

**Procedure Number**

09-03-10 Environmental-Mitigation-Monitoring

**Procedure Revision Number**

REV 00

**Responsible Manager**

[Alameida, Ronald \(DPW\)](#)

[Ko, Albert \(DPW\)](#)

**Purpose**

To establish procedures and guidelines to ensure the timely implementation of mitigation measures, mitigation-monitoring plans, and permit conditions are included within a project’s budget, and incorporated into the project plan.

**Policy**

Mitigation measures, monitoring plans, permit conditions and other requirements are an essential part of implementing an approved project. Mitigation measures, monitoring plans, permit conditions and

other requirements are mandates and part of the authorization for the projects ability to move forward. They constitute a contract between the City and the public and regulatory agencies that the City will comply with project controls, reports, and studies as part of project delivery.

### **Discussion**

After the conclusion of the CEQA and/or NEPA process(es) and in advance of Quality Assurance/Quality Control review – see Procedure 10-05-01 (Quality-Assurance-Quality-Control-Plan) – the regulatory affairs (RA) manager provides the project manager (PM) with access to the environmental commitments record (ECR) compiled jointly by RA and Site Assessment and Remediation (SAR), which lists the project-specific environmental commitments arising from:

The NEPA process (and associated federal processes as applicable);

The CEQA process, including any standard construction measures adopted by the department that specifically apply to the project (all Public Works contracts must comply with standard construction measures for public works contracts, see Attachment A);

Permits from resource agencies for effects to resources under their jurisdiction. See Procedure 10-02-20 (Regulatory-and-Permitting-Agencies); and

Project-specific applications of the regulation of hazardous materials and of pollution-source-control requirements.

The most stringent of the applicable regulations and law will apply.

The ECR will present the required mitigation measures or revisions, any related conditions of approval, the persons or agencies responsible for ensuring their completion, the timing for their completion, and the responsible person's or agency representative's affirmation of completion.

For all commitments, the PM completes the ECR form fields in which the explanations for how each commitment has verifiably been met are recorded.

Where any of these become the responsibility of the construction contractor, the PM ensures that these be explicitly incorporated into project plans and specifications. The PM may engage specialist offices in Public Works as part of this effort. SAR provides standard and project-specific environmental specifications for all projects. All commitments that are identified as being met by the application of standard construction measures adopted by the department are also addressed in contract language provided by the SAR office. The PM may additionally engage RA staff to assist with additional specification language associated with any of the following: Biological resources, Cultural resources, Visual/community impacts.

Where any of these commitments do not become the responsibility of the contractor, they remain the responsibility of the department to which the environmental document(s) and permit(s) were issued. It is the responsibility of the PM to track and fulfill these commitments, and to notify RA in a timely manner of the progress of their execution. For projects for which another department was the recipient of environmental document(s) and permit(s), this responsibility lasts until such time as Public Works formally ceases to be contractually involved with the project.

## Procedure

1. When the PM is notified by RA that the ECR has been compiled by RA and SAR and is ready for review, the PM reviews its requirements for mitigation, minimization measures, reporting, site controls and mitigation monitoring, and makes sure to understand what they are and why they are required. Each project and set of mitigation measures is tailored to each specific project and may require a variety of technical monitoring support staff and consultants. The contents and complexity of the monitoring plan will vary based on the characteristics of the project being approved, the environmental effects being mitigated, and the nature of the mitigation measures themselves. SAR and RA may assist the PM in their review.
2. The PM ensures that all conditions are explicitly incorporated into the construction-contract documents that become the responsibility of the project construction contractor. Environmental commitments in the ECR for which the contractor is responsible must be rendered into binding, enforceable contract-specification language. It is the responsibility of the PM to identify, within the project plan, the resources necessary for this activity and to provide a schedule for its timely completion.
3. The PM is responsible for providing documentation, such as accepted consultant contracts, or the written designation of specific department staff for execution of specific tasks, for addressing all other outstanding environmental commitments.
4. The PM completes the ECR fields in which the explanations for how each commitment has verifiably been met are recorded. All commitments that are identified as being due before construction must be completed by the PM and verified by the regulatory specialist assigned to the project before the regulatory manager can complete QA/QC review.
5. The SAR manager will use the QA/QC reviews form to certify that all standard construction measures have been incorporated into the project contract package. Refer to Procedure 10-05-01 (QA/QC Plan).
6. Recording of meeting environmental commitments in the ECR remains the responsibility of the PM through construction and post construction.
7. Mitigation monitoring and reporting requirements are the responsibility of the PM. Such a commitment may extend for several years after the conclusion of project construction. The task of creating monitoring and reporting plans is the responsibility of the PM and is subject to the approval of the public agency that is approving the environmental document or permit for the project. A plan for monitoring the implementation of mitigation measures should contain at least the following components:
  - a. A list of those mitigation measures or revisions and related conditions of approval from the ECR that have been adopted for the project by the agency and require monitoring and reporting.
  - b. A schedule for regularly checking on the project's compliance with the mitigation measures or project revisions and related conditions of approval, including progress toward meeting specified standards, if any. The program may set out the stages of the project at which each mitigation measure must be implemented.

c. A statement assigning responsibility for monitoring implementation of the mitigation measures and related conditions of approval to specific persons or agencies, public or private.

8. Realization of environmental commitments in contract specifications, or within a mitigation monitoring reporting plan (MMRP), often requires specialist technical knowledge associated with the resource being protected, with the means required for protecting the resource, and/or with the formulation of effective construction-specification language.

9. The SAR section document “Field Procedures Manual for Environmental Mitigation Monitoring” and SAR staff can assist the project manager in determining the appropriate monitoring procedures.

10. The PM shall determine early in project development if the skills required for meeting mitigation and monitoring requirements are available within Public Works, or if consultant contractors should be engaged.

a. Contract vehicles should be identified early. For larger projects, environmental site controls, mitigation studies and report services are required at all phases and need to be accounted for at the planning, design and construction services phases. For federally funded projects and for projects with construction durations of more than two years or after as-needed contracts expire, separate request for proposals and contract need to occur.

b. For small, short-term projects without federal funding, as-needed consultants can be used. During the design phase, the project lead (PL), SAR personnel and the RA manager share the technical leadership of the mitigation monitoring resources. The PM is ultimately accountable for the completeness and quality of the specifications to meet the monitoring plan.

c. San Francisco Planning will only accept consultant contractors from their pool of approved contractors. SAR and RA can provide guidance on appropriate consultant contractors.

d. If monitoring duties are contracted to private individuals or firms, the project shall make provision for the submittal of all required regular progress reports to the agency, establishing a mechanism for appealing actions of the consultant contractor to the agency for decision, and ensuring that the selection of the consultant contractor meets the agency’s requirements.

**Volume**

09 Project Management Manual

**Chapter**

09-04-0 Project Delivery Methods

**Procedure Number**

09-04-03-14 Award-Certification-and-NTP-for-CMGC-Projects

**Procedure Revision Number**

REV 00

**Responsible Manager**

## **Purpose**

To establish guidelines for awarding, certifying and issuing the notice to proceed (NTP) for Public Works construction contracts using the CM/GC project delivery method.

## **Policy**

The department shall abide by the provisions of Chapter 6 of the San Francisco Administrative Code, which sets forth policies and procedures for public works contracting.

## **Discussion**

This procedure covers the topics of award, certification and notice to proceed from the perspective of the Design and Construction Division. Users should also refer to Public Works Procedure 06-03-01 (Construction Contracts – Formal Competitive Bids), which covers these topics from the Division of Contract Administration perspective. Refer to Public Works Procedure 11-01-06 (Award Certification and Notice to Proceed) for projects using the design-bid-build delivery method.

Notice to proceed (NTP) for project construction must be preceded by completion of Public Works QA/QC. QA/QC completion is not required for NTPs solely for preconstruction services. This includes, for projects delivered using an integrated project delivery approach such as CM/GC or design-build, the hiring of a contractor to perform pre-construction services during the design development phase in advance of the completion of QA/QC. Refer to Procedure 09-04-03 (CMGC Integrated Project Delivery) for projects delivered using the CMGC approach and Procedure 09-04-02 (Design-Build) for design-build projects.

Preconstruction services, for the purposes of this procedure, means activities for which Public Works enters into contracts but that do not commit the department to a specific project alternative or to project construction. These include cost estimations, constructability reviews, site investigations that have no physical impacts, pre-qualification of subcontractors and construction preliminary design services.

Responsibilities are shared among the following entities:

**Contract Administration:** The Office of Financial Management and Administration's Contract Administration Division (CA) is responsible for processing the award, certification and NTP. The QA/QC program manager (QPM) of the Project Controls and Services Division is responsible for maintaining the QA/QC procedures, and for monitoring compliance with the QA/QC forms and review procedures. The QPM is the section manager of the Contract Preparation and Project Controls Section or his/her designee.

**Project manager:** After the contract has been awarded, the project manager (PM) is responsible for monitoring the certification process. Where no PM has been designated, the notation PM in this procedure shall also refer to the project design lead (PL) who assumes the duties of the PM.

**Construction manager:** The construction manager (CM) establishes the NTP date in consultation with the contractor.

## Procedure

### 1. Award of contract phase

a. The San Francisco Administrative Code requires the City to award Federal or State grant funded contracts within 120 days after the bid opening. All other contracts must be awarded within 90 days after the bid opening, unless a written authorization is obtained from the bidder/s to extend the award expiration time and the director approves such extension.

b. The PM ensures that all the funds are in place for the award amount plus contingencies, and then initiates the action to award via written request to Contract Administration staff. The Contract Monitoring Division (CMD) must also submit a review of the bids received and confirm compliance with bid requirements and make a recommendation for award. Both recommendations must be to the same bidder for Contract Administration to proceed with process a contract award request.

c. CA verifies that the contractor complies with Chapter 12B of the Administrative Code, the contractor has a current and active contractor's license, and the contractor has completed all required bonds and insurance documents. The San Francisco Administrative Code forbids City officials from executing any contract if the contractor does not comply with Chapter 12B or if contractor has not received a waiver of the requirements of Chapter 12B.

d. CA verifies Cal OSHA safety documents are all in compliance and prequalifies contractor for award. CA prepares mayor's designee approval form and routes the form for Public Works director and mayor's designee approval. CA prepares the public works order awarding the contract, obtains the public works order number from the online order system, and obtains the Director's formal approval of the award. CA distributes copies of the award to a list of Public Works staff. See Attachment A for a sample completed public works order awarding a project. If a project is be administered on behalf of another Chapter 6 authorized department, a board or commission resolution approving of the award of the contract is required.

e. CA prepares a cover letter for transmitting the award to the contractor which will include the following contract documents:

- Contract agreement
- Insurance as required by Administrative Code 6.22(B) and specified in the bid manual
- Payment ("labor and materials") and performance bonds

f. CA sends the cover letter, copy of the public works award order, and contract documents to the contractor in pdf format via email with specific instructions for completion, execution and notarization of signatures. The terms of the project manual typically allow the contractor 10 working days to obtain their insurance and bonds before returning the executed contract documents to CA.

g. CA also puts the contractor's surety on notice that failure of the contractor to return the executed contract documents within 10 working days may subject them to default claim against the bid bond.

h. Upon receiving the returned contract documents, CA verifies that the documents are complete and comply with the City's requirements.

i. For contractors with City-issued construction contracts in excess of the threshold amount (see <https://oewd.org/first-source>), the administrator of the First Source Hiring Program follows up by contacting the contractor to implement the first source hiring and City build requirements.

## 2. Certification phase

a. CA routes the contract package for execution to the following:

- Contractor
- Project manager
- Deputy director of public works
- Director of public works (or head of another department authorized to award public works or improvement contracts if Public Works is hired to administer its contracts)
- Deputy city attorney

b. After the contract documents have been fully executed, CA then inputs the contract into the PeopleSoft system. CA then submits a purchase order creation request to Accounting that includes:

- Award of formal contract (public works order to award) or board/commission resolution (See Attachment A)
- Certificate(s) of insurance
- Performance bond and payment ("labor and materials") bond (one original signed copy of each document). On alternative project delivery methods, bonds are applicable only to construction phase services.
- Contract agreement (two original signed copies)

c. The Controller certifies the contract when a purchase order is created and dispatched for the contract, signifying that the PM has set up adequate funds in the financial system for the construction contract.

## 3. Notice to proceed

a. After the Controller's Office certifies the contract, CA confirms that, if applicable, local hire forms are submitted to OEWD and If applicable, the bid documents are escrowed with the approval of the manager of Project Controls and Services. Upon confirmation of both actions, CA sends the Construction Management group a request for a start date for the NTP. The CM coordinates with the PM and contractor in scheduling the start date and returns the information to CA.

b. Once the CM or PM informs CA of the desired official start date, CA prepares the NTP form and sends the same to the contractor with a copy of the contract agreement and order of award. The NTP issued at the time of contract award will authorize the contractor to proceed with pre-construction services. When all conditions allowing construction to proceed have been met, a second NTP for construction phase work will be issued. The NTP form specifies the time allowed for construction and the projected substantial and final completion dates.

c. NTP for pre-construction. The PM/PL shall coordinate with CA to issue a NTP for pre-construction services. Completion of the QA/QC process is not required for the issuance of the NTP for pre-construction services. The NTP for pre-construction services shall not be interpreted or applied as a notice to proceed for any form of construction. A separate NTP as under 3.d., below, is required.

d. NTP for construction. Documentation of the completed Public Works QA/QC process, as delineated in Procedure 10-05-01 (Quality Assurance Quality Control Plan), must be finalized and forwarded to CA, and verified by CA, prior to the issuance of a NTP for project construction.

**Volume**

10 Design Manual

**Chapter**

10-01-0 Planning/Pre-Design Phase

**Procedure Number**

10-01-04 Environmental-Review

**Procedure Revision Number**

REV 02

**Responsible Manager**

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**Purpose**

To establish procedures and guidelines for environmental review for all projects.

**Policy**

For any activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, project managers (PMs) shall consult with the Public Works Regulatory Affairs (RA) manager for a determination on the applicability of the legal necessity for project compliance with the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA) and permitting for environmental-resource protection (excluding permitting and other legal requirements associated with hazardous materials and pollutant source controls, which are the remit of the Public Works Site Assessment and Remediation section).

Compliance processes triggered by these laws and requirements are collectively referred to for the purposes of this procedure as “environmental review.” Environmental review is a required component of Public Works quality assurance/quality control (QA/QC) procedures (see Procedure 10-5-1 Quality Assurance Plan), which together with Public Works Procedure 11-06-08 (Environmental Compliance in Construction) ensures Public Works compliance with §15097 (Mitigation Monitoring or Reporting) of the CEQA guidelines.

For the City of San Francisco's collective officials, boards, commissions, departments, bureaus and offices, all administrative actions required by CEQA with respect to the preparation of environmental documents, giving of notice and other activities are performed solely by the environmental review officer (ERO) of the Environmental Planning Division within the San Francisco Department of Planning (Planning), in accordance with Chapter 31 of the San Francisco Administrative Code.

The RA section is responsible for obtaining environmental clearances under CEQA and NEPA and is the sole point of contact between Public Works staff and the lead agencies under the California CEQA, including the San Francisco Planning Department, and under NEPA, for matters of environmental review. There is no restriction on contact with Planning for other Planning functions (code compliance, zoning issues, etc.).

No project approval as defined in the CEQA guidelines at §15352(a) and further defined for City purposes in San Francisco Administrative Code Chapter 31 for a Public Works project may take place until the CEQA process is complete.

 [10-01-04 San Francisco Public Works Environmental Review Process Memo.pdf](#)

## **Discussion**

Environmental review should begin as early as feasible in the project planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment. (CEQA Guidelines at §15004(b)) and is initiated by PMs through the RA RAMS database. See Procedure 19-01-01 (Regulatory Affairs Database) for specific timing requirements.

For the purposes of the Public Works QA/QC, the CEQA process comprises: 1) the CEQA application submitted to Environmental Planning Division; 2) the CEQA exemption or determination received from the Environmental Planning Division, and 3) the incorporation into the final project plans and contract specifications of any mitigation measures from CEQA, of environmental commitments from CEQA-related City entitlement processes and/or of standard construction measures (SCMs), that can be addressed prior to project construction. RA also verifies the realization of environmental commitments from NEPA and from regulatory permitting, and the application of the terms of Public Works orders 201,954 and 172,596 for projects submitted to RA for QA/QC review. See procedures 10-5-1 (Quality Assurance Plan) and 09-03-10 (Environmental Mitigation Monitoring).

SCMs are a suite of protective measures that Public Works has committed to incorporating into construction for all projects through a CEQA exemption from Planning. Being standard for all projects, Planning does not consider them to be project-specific mitigation, and so projects that would otherwise require an extended CEQA review and a document can be exempted. All Public Works projects require SCMs, even projects found to be statutorily exempt under CEQA.

Large-scale projects that in the view of the Environmental Planning Division could result in significant environmental impacts under CEQA will require the production of CEQA documents, a process that may take six months to two years to complete, depending on the scale and nature of the anticipated impacts. Most small projects are exempted from CEQA, a process which may take from weeks to months. Small projects in historic structures may often be processed over-the-counter with coordination between the Environmental Planning Division Environmental Review and the PM through RA.

Planning may request additional information before beginning environmental review and have the right to suspend review of any project if the requested information is not provided. RA has no ability to compel the Environmental Planning Division to follow a particular schedule. RA can communicate prioritization requests that originate with Public Works management directly to Planning.

All commitments arising from environmental review are broken down into a table of tasks and required actions called the environmental commitments record (ECR) maintained in the RA RAMS database. PMs ensure that all environmental commitments resulting from environmental review are realized in a timely manner.

PMs are responsible for providing all required information for all phases of environmental review, as requested by the RA manager, in accordance with Procedure 19-01-01 (Regulatory Affairs Database), for compliance with the Public Works QA/QC process, and for the payment of all fees, including those to external departments and agencies, and for consultant services that may be required.

Construction Management is responsible for the enforcement of such environmental commitments that are made the responsibility of construction contractors through construction-contract documents, and for providing documentation that these commitments are consistently enforced.

The Hydraulics, Structures, Site Assessment and Remediation, and Geotechnical sections are responsible for providing requested analysis and support to RA in technical regulatory matters. Site Assessment and Remediation is further responsible for addressing all requirements for hazardous-materials and pollutant-source-control mitigation obligations for Public Works projects generated through the CEQA, NEPA and environmental-regulatory-permitting processes, and for verifying Public Works compliance with all of these.

## **Procedure**

1. The PM submits project plans, an initial project description sufficient to make preliminary suppositions as to project impacts and affected resources, a Public Works QA/QC plan form and any additional intake information as required by the RA manager, to the RA manager via the RAMS database. The PM is also responsible for submitting a Maher screening form for the project to the Site Assessment and Remediation section. The Maher screening form provides documentation for the CEQA administrative record that compliance processes mandated by the SCMs for hazardous-materials abatement have been initiated.
2. On the basis of this submittal, the RA manager may either:
  - a. Determine that the project is not subject to CEQA review, for which determination a concurrence from a representative of the ERO is required.
  - b. Determines that the project is subject to CEQA, but that the project is suitable for the PM to obtain CEQA clearance via Department of Building Inspection routing to Planning during the process of obtaining a building permit. It is the responsibility of the PM to submit documentation of CEQA clearance for the project, once obtained, to the RA manager.
  - c. Determines that the project requires some form of handling by RA, and supplies a fee proposal to the PM for RA's fees for environmental review.
  - d. Determines that the submittal was inadequate and requests additional information and clarification.

3. 3. No work will be done by RA staff until the funding requested in the fee proposal has been allocated. The proposal must be accepted and be funded before coordination/review can continue.
  - a. If the scope of environmental review requested by the lead agencies is greater than that anticipated in the fee proposal, the RA manager will submit a supplementary fee proposal to the PM. Funding allocation must be received before RA staff begin work on the additional scope.
  - b. If the project is funded by overhead, the PM must obtain concurrence from the Design and Engineering manager that the use of overhead funding is approved.
  - c. Projects that are screened out as not requiring any coordination or QA/QC by RA will be processed by RA on overhead and generate no fees for the PM.
  - d. The PM is responsible for any fees associated with environmental review, including Planning fees, permitting fees and consultant fees.
  
4. All communications between Public Works staff and the staff of the Environmental Planning division of the San Francisco Planning Department are conducted only through RA; PW management may contact the environmental review officer directly as long as the RA manager is copied on all correspondence.
5. RA staff prepare as needed a specialized environmental project description, and prepare and submit application submittals as necessary according to the lead agencies' requirements. PM will provide additional information as necessary for completion of these submittals, as requested by RA staff.
6. The RA manager will apprise the PM of additional submittals that are required by the lead agencies for environmental analysis. The RA manager is responsible for overseeing the production of consultant-produced submittals.
7. After the issuance of the CEQA and/or NEPA exemption or determination, the RA manager provides the PM with:
  - a. Documentation of the environmental exemption or determination.
  - b. An environmental commitments record (ECR), which lists the commitments arising from the NEPA process (and associated federal processes as applicable) and the CEQA process.
  - c. A list of the project's required local discretionary approvals and permits required from resource agencies for effects to resources under their jurisdiction. The PM may engage the RA section to undertake the obtaining of these approvals and permits; the RA manager may require a supplemental fee proposal.
  - d. The PM must provide copies of any permits received without the assistance of RA to RA immediately upon receipt. Requirements from these approvals and permits are incorporated into the ECR.

8. All pre-construction ECR items identified by RA must be completely addressed by the PM before the conclusion of RA QA/QC review. The PM must ensure that all commitments that become the responsibility of the construction contractor be rendered into binding, unambiguous, non-repetitive, and enforceable contract language before applying them to the ECR. Attachment of environmental documents or permits to the contract is not sufficient. See Procedure 09-03-10 (Environmental Mitigation Monitoring).
9. The PM must provide confirmation that the project construction scope is consistent with the project's environmental-document's project description, provides the date and form of project CEQA approval actions, and provides documents or data associated with the approval action, before the conclusion of RA QA/QC review.
10. During construction. Construction Management provides to RA plans, affidavits, etc., required of the contractor by environmental commitments incorporated into project specifications, and documentation that all other environmental commitments incorporated into project specifications are being enforced and that the contractor is consistently in compliance with these. See Procedure 11-06-08 (Environmental Compliance in Construction).
11. The PM is also responsible for ensuring all environmental commitments that are not incorporated into the construction-contract specifications are realized, including commitments that remain after the conclusion of construction (i.e. mitigation monitoring reporting, etc.) and for recording these in the RAMS database. The RA manager notifies the PM that a project is complete when there are no ECR tasks outstanding.

**Volume**

10 Design Manual

**Chapter**

10-02-0 Architectural and Engineering Design Phase

**Procedure Number**

10-02-20 Regulatory-and-Permitting-Agencies

**Procedure Revision Number**

REV 05

**Responsible Manager**

[Ko, Albert \(DPW\)](#)

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**Purpose**

To provide a list of some of the agencies that may have regulatory and/or permitting oversight on capital projects carried out by San Francisco Public Works.

**Policy**

Public Works shall coordinate with all regulatory and permitting agencies and abide by the agencies' requirements when delivering capital projects on behalf of our clients.

### **Discussion**

Various public agencies at the local, state and federal levels may regulate or require special approvals or permits for work performed under their purview. In most cases, their authority is usually established by law. A listing of some agencies commonly encountered in Public Works projects is attached.

### **Procedure**

1. During the planning phase of any project, the project manager (PM), project lead (PL) and/or members of the project design team shall in conjunction with the requirements of the quality assurance/quality control procedure (see Procedure 10-05-01 Quality Assurance Quality Control Plan), review the attached listing and consult with San Francisco Public Work's Regulatory Affairs (RA) manager, the Site Assessment and Remediation (SAR) section manager, and other experienced personnel to identify and determine whether special approvals or permits need to be obtained from any public agency.
2. The PM shall become familiar with the specific requirements of the agencies identified.
3. If approvals from certain agencies are required, the project design team's involvement will be dictated by the PM or PL. The project design team's role can include the following:
  - a. Attending public hearings or meetings.
  - b. Preparing and/or giving project presentations. See Procedure 10-02-10 (Design Presentations).
  - c. Meeting/conferring/negotiating with agency representatives.
  - d. Preparing permit applications or other documents required for agency approval.
4. The PM may engage the RA section to undertake the obtaining of anticipated resource-agency approvals and permits. The PM must provide copies of any applications for permits prepared without the assistance of RA and permits issued without the assistance of RA to the RA manager immediately upon receipt.
5. Project-specific applications of the regulation of hazardous materials and of pollution-source-control requirements are within the purview of the SAR section; all contact with such regulators should be conducted through SAR.

See Attachment A for regulatory and permitting agencies list:

 [10-02-20 Regulatory and Permitting Agencies-Attachment A.pdf](#)

### **Volume**

10 Design Manual

### **Chapter**

10-05-0 Quality Assurance and Quality Control During Design

**Procedure Number**

10-05-01 Quality-Assurance-Quality-Control-Plan

**Procedure Revision Number**

REV 06

**Responsible Manager**

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**Purpose**

To establish a quality assurance/quality control (QA/QC) plan during the design phase of capital projects in order to produce well-managed, well-designed and properly constructed projects that meet or exceeds the client's expectations and completed within the established budget and schedule.

**Policy**

Ensure quality of design for capital improvement projects planned, managed and/or designed by Public Works, a systematic process of assessing project development must be implemented, monitored and maintained.

Producing a quality project requires adherence to all applicable QA/QC procedures:

Quality assurance (QA) is the systematic process of checking to see whether a project being designed and constructed is meeting specified requirements. QA is performed during the process of developing the contract documents and during construction.

Quality control (QC) is the process of checking that the finished design or construction project meets the specified requirements. QC is performed after completion of a design phase or during the construction phase.

**Discussion**

As the QA and QC procedures are interrelated, the entire process is referred to as QA/QC. Responsibility for performing QA/QC is shared by the following:

- Owner/client: The owner/client is responsible for clearly communicating the project needs, expectations and constraints to the project manager and the design team; for coordinating client progress reviews of design documents and transmitting comments to the design team in a timely manner; for properly communicating decisions that affect the project scope, quality, budget and schedule; and for adequately funding the project. The client is also responsible for operability review.
- Bureau manager: The bureau managers of Bureau of Architecture (BOA), Bureau of Engineering (BOE), Bureau of Project Management (BPM) and Bureau of Construction Management (BCM) are responsible for ensuring that adequate procedures are in place and appropriate organizational structure exists for supporting QA/QC activities. When reviewing the QA/QC plan

at project inception, BPM manager shall take note when “federal grant” is selected in the funding type box of Section 1 of the QA/QC plan form. When this box is checked, the bureau manager shall add the following comment when signing off the QA/QC form: “Project Manager to use updated Federal DBE language template for consultant contracts.”

- Project manager (PM): The PM has overall responsibility for establishing a project’s budget and schedule; for committing to and funding the appropriate level of QA/QC review, for organizing the project team, for being the direct link to the client and for communicating effectively with the team.
- Section manager: The section manager is responsible for ensuring that the discipline-specific design team members follow established procedures and for providing resources for all design activities including design reviews.
- Project lead (PL): The PL is responsible for coordinating all design activities; for establishing the design criteria; and for ensuring that QA/QC reviews and project reviews take place. Depending on the project, PL means the project engineer, project architect or project landscape architect. The PL for most projects may also be the lead designer from the lead discipline.
- Regulatory Affairs (RA) section manager: The RA section is responsible for coordinating environmental clearance; ensuring that the scope of each fully designed project is consistent with the scope of the project when it received environmental clearance; ensuring that environmental commitments from environmental documents, consultations and permits for which the contractor will be paid are incorporated into project specifications; and checking that those commitments for which Public Works is otherwise responsible are fulfilled by the PM.
- Site Assessment and Remediation (SAR) section manager: The SAR manager is responsible for ensuring that the project complies with the department’s responsibilities associated with regulation of hazardous materials and pollution source control, and for ensuring that the project incorporates any standard construction measures adopted by the department.
- QAQC program manager (QPM): The QPM of the Project Controls and Services group is responsible for maintaining the QA/QC procedures, and for monitoring compliance with the QAQC forms and review procedures. The QPM is the section manager of the Contract Preparation and Project Controls Section or their designee.
- Construction manager: The construction management bureaus in both Infrastructure Design and Construction – Construction Management (IDC-CM) and Building Design and Construction – Construction Management (BDC-CM) are responsible for performing constructability review on projects before they go to bid and for ensuring that the contractor performs the work according to plans and specifications. At the end of construction phase, IDC-CM and BDC-CM conduct a post-construction project review.

## **Procedure**

### **1. Definition of a project**

For the purposes of this procedure, a project is construction, maintenance and/or repair of a facility or right of way infrastructure that involves one or more of the following:

- a. Any activity that triggers or requires a local, state or federal permit.
- b. Any facility subject to the Americans with Disabilities Act.
- c. Any form of demolition.
- d. Any form of new construction including replacement and/or rehabilitation.
- e. Constructability reviews.
- f. Technical review of engineering, architectural and/or landscape architectural design prepared by Public Works staff.
- g. Potential for interaction with any form of archaeological resource.
- h. Potential for interaction with any form of historic resource, including any structures or districts on or potentially eligible for local, state and/or national historic registers; and historic materials within areas of Public Works jurisdiction.
- i. Potential for interaction with biological resources, including but not limited to:
  - work in areas zoned as open space
  - removal of trees, or work on trees during the nesting season as determined by the US Fish and Wildlife Service for migratory and non-game birds
  - work in, above or adjacent to bodies of water
  - work in or adjacent to any area established as protected habitat under local, state or federal law
- j. Potential for encountering hazardous waste or other regulated hazardous materials.
- k. Sites within the jurisdictions of the California Coastal Commission or the Bay Conservation and Development Commission.
- l. The use of state and/or federal funds.
- m. The use of off-road construction equipment.

## **2. Overview of QA/QC plan**

This procedure provides the general overview of the QA/QC plan and procedures for capital improvement projects. Refer to the QAQC plan flow chart for a flowchart showing the different design phases, reviews, and QA/QC procedures. QA-QC Flow Chart.pdf

## **3. Design team QA checklist**

For multidiscipline projects, the project design team may consist of staff from the various architectural and engineering design sections, each of whom carries different roles and responsibilities for preparing the contract documents. The design team from each discipline may include the lead designer, drafter, checker, and group leader. The lead designer is responsible for following and completing the QA checklist for their discipline. Refer to Procedure 10-05-02 (Design Quality Assurance Checklists).

#### **4. Project reviews**

At certain stages of design, projects must undergo a project review by a team of reviewers from each discipline who are not associated with the project. The section manager shall designate staff to perform project reviews for their discipline. Procedure No. 10-05-03 (Project Review) establishes guidelines and procedures for this review process.

#### **5. Consultant-designed projects**

Project design for which a consultant is the responsible lead must go through the consultant's own design QA/QC process. The PL must ensure that the following internal reviews for such projects are conducted by the department: Project peer review, CAD/BIM manager, CM constructability, Contract Prep, disability access coordinator, public affairs, Regulatory Affairs, SAR manager, value engineering and deputy division manager. The agreement between the City and consultant should spell out the QA/QC requirements. The PM shall require proof that QA/QC has been performed. Procedure No. 10-05-04 (Quality Assurance of Projects Using Consultants) outlines the QA/QC procedure for consultant-designed projects.

#### **6. RA review**

a. RA reviews all projects at the initial project plan stage and advises the PL as to requirements for environmental clearance. Projects that have environmental commitments, and/or for which the scope of work has expanded since environmental review, must be reviewed by RA at the 50% PS&E/100% DD milestone. RA will provide guidance on the incorporation into specifications of commitments in the construction contract and provide the PM with a summary of Public Works' other outstanding commitments (i. e. post-construction mitigation monitoring, annual monitoring reports, compensatory mitigation, etc). RA will, as necessary, initiate revalidation/re-evaluation of projects with substantial scope changes as appropriate. At the 95% PS&E/95% CE milestone, all projects, unless otherwise indicated by RA on the QA/QC plan, must be reviewed by RA, at which time RA will determine whether all commitments have been addressed. For projects for which environmental review is managed by another department, RA will provide confirmation that the environmental review process has been concluded and that all commitments have been addressed.

b. Projects meeting all requirements below are screened out from requiring RA coordination. The RA manager will determine if a project meets the following criteria:

- Will receive a Department of Building Inspection or Port building permit for work on a building listed as a historic resource status "Category B" or "Category C." in the Planning Department's property information management system (<https://sfplanninggis.org/pim>) and, if "Category B", will also not involve any demolition of the structure or of architectural finishes.
- Does not introduce a source of emissions or of noise audible at the property line.
- Does not involve construction equipment with an off-road engine having greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities, for construction activities lasting for at least 20 days.

- Does not remove trees and/or vegetation.
- Does not involve excavation.
- Does not involve a change of use (for example, from industrial to office space) or intensification of use.
- If project work extends into the public right-of-way, involves only maintenance, or repair without replacement, of existing facilities with no demolition or excavation.

## **7. SAR review**

SAR reviews projects at the 75% PSE/50% CD milestone and provides the PL with contract specifications for project compliance with the department's responsibilities associated with regulation of hazardous materials and pollution source control, and with any standard construction measures adopted by the department.

## **8. Contract Preparation review**

At the 95% design stage, the PL sends drawings, specifications, and cost estimate to Contract Preparation for QA/QC review. Contract Preparation is responsible for making sure that this QA/QC procedure has been followed, that the contract documents are complete for bidding, and that appropriate contracting requirements are included. Procedure No. 10-05-05 (Contract Preparation Review) details the procedures for this review.

## **9. Public Affairs review**

The PL/PM will provide documentation of this coordination to the public affairs manager with the 95% review form. It is the responsibility of the PL and/or PM:

- To consult with the department's policy and communications office to ascertain whether the project requires community notification as per Public Works Code.
- To consult with the department's policy and communications office to ascertain whether project delivery could be improved through community outreach.
- To determine whether the project sponsor will provide public-affairs coordination and outreach in lieu of the department's involvement.

## **10. Related procedures**

Some of the required reviews for QA/QC have their own separate procedures:

- Project peer review.** Project peer review is a process whereby outside experts or other City professionals review a project or a portion of a project being designed by City staff to critique the design. For consultant-designed projects, selected City staff or other consultants will perform the project peer review. Procedure 10-05-06 (Project Peer Review) provides the guidelines for such reviews.
- Constructability review.** Construction staff shall be brought into the design process early enough to provide input and guidance on the design. Therefore, at the 50% or 75% design stages (or 50% design development and 50% construction document phases for BDC projects) the project design lead shall

request a constructability review from the construction management bureau. The construction management bureau will also provide a review at the 95% stage. Procedure 10-05-07 (Constructability Review) outlines the procedure for such a review.

c. Quality assurance audit. The bureaus may conduct a quality assurance audit at any stage of a project to ensure that all design work is performed in accordance with Public Works policies and procedures. Procedure 10-05-08 (Quality Assurance Audit) outlines the procedures for such an audit. Incorporating lessons learned to ensure continuous improvement, it is important to learn from past experiences. The PL and the project team should review past data on errors and omissions and incorporate lessons learned. The PL and the team should also incorporate client feedback where appropriate. Procedure 09-03-08 (Project Assessment) provides the procedures for incorporating lessons learned.

d. Disability access coordinator review. Public Works procedure No. 10-02-12 (Preparing Technical Drawings) is used to identify the scope of work required to attain accessibility compliance on all Public Works projects and to ensure that construction documents and completed facilities meet all applicable requirements and policies.

## 11. Documentation

QA/QC forms are to be used to track QA/QC and document that QA/QC has been fully executed. The completion of the QA/QC form set demonstrates that the project is ready for bidding.

a. The following are the forms used for this procedure:

-  [QAQC Plan.pdf](#)
-  [Project QAQC Reviews Form.pdf](#)
-  [10-05-01 95 Percent Review Transmittal Form Fillable.pdf](#)

b. For each completed plan, and each completed 95% and 100% review form circulated, the PM or PL shall provide a completed copy to the QPM, save a completed digital copy in the project folder, and notify the PCS manager by email that such form has been completed.

c. At the planning and programming phase, the PM or PL shall, concurrent with the project plan, complete the project QA/QC plan form, obtain all reviewer signatures indicated by the form, address all comments made by reviewers, and save a digital copy in the project folder. The QA/QC plan form shall be completed as follows:

Section 1:

- Title: This is the project title in FSP
- Project description: This is a short, clear statement of the scope and scale of the project.
- FSP ID: This is the FSP numeric ID code.
- Estimated construction cost: This is a rough estimate of hard construction costs only.
- Other items are self-explanatory.

Section 2. The PM or PL shall:

- Provide estimated approximate review dates for all milestones, each in the appropriate column.
- The remainder of the section is prescriptive, to be altered by reviewers only.

Section 3. The PM or PL shall:

- Check off all current and projected project team members. When providing them with the final, fully signed Plan form, include the project information that was circulated with it.

Section 4. The PM or PL shall:

- Check off known applicable regulatory agencies. Reviewers may add additional agencies.
- Signatures: Obtain all signatures – wet ink only. Circulate copies of final signed plan to all signatories, all project team members, and the Contract Prep manager.
- Comment fields are for reviewers' comments only. These may not be altered once the reviewer has signed.
- The PM or PL shall address all comments made by reviewers before circulating a project QA/QC reviews form.
- If the scope of the project has changed substantially since the planning and programming phase before the 50% PS&E/100%DD milestone, the PM or PL will recirculate the plan form with the updated project information.

d. Project QA/QC reviews form

- For every review milestone indicated in Section 2 of the QA/QC Plan, the PM or PL shall circulate the QA/QC Reviews form to the reviewers indicated in the Plan as required for that milestone.
- The review form shall be accompanied by project information sufficient for the reviewer to conduct their review.
- The 2. Final Reviews section is reserved for the 95% review circulation. The final reviewers shall not sign unless all of 1. QA/QC Reviews Completed has been completed, including the SAR certification, and all comments from the reviews have been addressed.

e. 95% Review transmittal form

- At 95% design phase, the PL shall use the 95% review transmittal form as the cover for distributing the 95% review package, which shall include QA/QC reviews form with QA/QC Reviews Completed fully completed.
- The QA/QC reviews form with all final review signatures (which is equivalent to 100% review) shall serve as documentation that the project is ready for bidding

**Volume**

11 Construction Manual

**Chapter**

11-06-0 Construction Management – Quality Control

**Procedure Number**

11-06-09 Clean-Construction-Ordinance

**Procedure Revision Number**

REV 00

**Responsible Manager**

[Alameida, Ronald \(DPW\)](#)

[Ko, Albert \(DPW\)](#)

**Purpose**

To ensure compliance of Section 2505 et seq. of the San Francisco Environment Code ("Clean Construction Requirements for Public Works"). This procedure will be followed whenever a project meets the description of a major project within an "Air Pollutant Exposure Zone" as defined in Section 2505 of the San Francisco Environment Code.

**Policy**

San Francisco Public Works will comply with the requirements of the Clean Construction Ordinance for Public Works construction. The ordinance is intended to protect the public health, safety, and welfare by requiring contractors on City public works projects to reduce diesel and other particulate matter emissions generated by constructions activities.

**Discussion**

Clean Construction Ordinance requirements will be integrated into construction-contract specifications as required by the ordinance. Before starting on-site construction activities for a project that meets the Clean Construction Ordinance criteria, the contractor will submit a construction emissions minimization plan ("emissions plan") to the department for review and approval. Review and approval is conducted by the Regulatory Affairs manager or the manager's delagee. Submittal of initial plans, quarterly reports and final construction emissions minimization reports by the contractor is a prerequisite to payment.

**Procedure**

1. During the project design phase, the Site Assessment and Remediation (SAR) unit will, in preparing and/or reviewing project contract specifications, indicate in the specifications whether the conditions triggering the requirements for a construction emissions minimization plan apply. SAR will ensure that the requirement for the contractor to provide all submittals and perform all the plan updates required

by the Clean Construction Ordinance, and for all applicable requirements of the construction emissions minimization plan, have been incorporated into the contract specifications. SAR will ensure that the contract specifications contain the provision that verifiable compliance with these requirements is a prerequisite for payment.

2. After the applicable project's notice to proceed date, the resident engineer will require the contractor to use the clean construction templates here: <https://www.sfdph.org/dph/EH/Air/CleanConstruction.asp> unless the resident engineer specifically approves another format. The resident engineer will receive the contractor's initial construction emissions minimization plan and receive approval of the plan before allowing the start of on-site construction activities.

3. The resident engineer, consistent with contract specifications, will require the contractor to make the emissions plan available to the public for review onsite during working hours and to post at the construction site a legible and visible sign in a visible location on each side of the construction site facing a public right-of-way summarizing the emissions plan. The use of signs other than the template provided by the Department of Public Health may be approved by the director.

4. After the start of construction activities, the resident engineer will ensure that the contractor maintains quarterly reports at the construction site documenting compliance with the Construction Emissions Minimization Plan. After the completion of construction activities, the resident engineer will ensure that the contractor submits a final construction emissions minimization plan report summarizing construction activities, including the start and end dates and duration of each construction phase and the specific information required in the emissions plan, as a condition of final payment.

5. The resident engineer will submit for review and approval all Clean Construction initial plans, quarterly reports, and final reports to the Regulatory Affairs manager or designated reviewer, who will return each approved plan or report to the resident engineer or inform the resident engineer of the specific deficiencies of the plan or report, within the duration for review listed in the project specifications. If the plan or report is deficient, the resident engineer will return the plan to the contractor with the description of the deficiencies.

6. The bureaus of Construction Management will place the completed Clean Construction plans and reports in the project file's Construction Management folder.

**Volume**

11 Construction Manual

**Chapter**

11-06-0 Construction Management – Quality Control

**Procedure Number**

11-06-08 Environmental-Compliance-in-Construction

**Procedure Revision Number**

REV 00

## **Responsible Manager**

[Alameida, Ronald \(DPW\)](#)

[Ko, Albert \(DPW\)](#)

## **Purpose**

To establish procedures and guidelines to ensure that project environmental commitments are implemented during construction in accordance with §15097 Mitigation Monitoring or Reporting of the CEQA Guidelines, and that compliance with environmental commitments is documented.

## **Policy**

Projects' environmental commitments may originate in standard construction measures, from environmental documents, from local, state or federal statutes, from environmental-consultation processes and from regulatory permits. It is the responsibility of the Construction Management bureaus to ensure that all environmental commitments for which the contractor is responsible are enforced.

## **Discussion**

The managers of the Construction Management bureaus shall integrate enforcement of the environmental-commitment contract-specification language into their supervision of project construction by implementing and documenting a program of supervision of project construction that ensures that the contractor complies with the environmental commitments within the project's contract specifications.

Generally applicable environmental commitments, avoidance measures, and minimization measures are included in standard contract specifications. Project-specific environmental commitments are compiled both by Site Assessment and Remediation and the Regulatory Affairs Sections (RA) in tabular form as an environmental commitments record (ECR) (see 09-03-10 Environmental-Mitigation-Monitoring). The resident engineer shall enforce these commitments during construction. The ECR is provided only as a guide to the project's environmental commitments, and in no way should it be construed to supersede or replace contract language.

For projects meeting the following criteria, no documentation is required:

- Will receive a Department of Building Inspection or Port building permit for work on a building listed as a historic resource status "Category B" or "Category C." in the Planning Department's property information management system (<https://sfplanninggis.org/pim>) and, if "Category B", will also not involve any demolition of the structure or of architectural finishes.
- Does not introduce a source of emissions or of noise audible at the property line.
- Does not involve construction equipment with an off-road engine having greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities, for construction activities lasting for at least 20 days.
- Does not remove trees and/or vegetation.
- Does not involve excavation.

- Does not involve a change of use (for example, from industrial to office space) or intensification of use.

If project work extends into the public right-of-way, involves only maintenance, or repair without replacement, of existing facilities with no demolition or excavation.

### **Procedure**

The project manager provides the ECR to either 1) the Manager of Construction Controls and Assurances within the IDC Bureau of Construction Management or 2) the Resident Engineer of the BDC Bureau of Construction Management no later than the time of the project's Notice to Proceed.

The bureaus of construction management shall review the ECR and regulatory specifications to identify the requirements on each particular project. The resident engineer, designated field staff or a consultant will monitor and enforce mitigation measures, monitoring plans, permit conditions, reporting and other requirements as the contractor carries them out.

The bureaus of Construction Management must adopt necessary forms, checklists and enforcement guidelines to be used by resident engineers for documentation (current samples are provided as attachments to this procedure). These forms and checklists will list standard environmental commitments, avoidance measures, and minimization measures, and incorporate any project-specific commitments listed in the ECR.

The bureaus of Construction Management must provide for recordkeeping of completed forms and checklists to demonstrate compliance. If documentation for compliance with environmental requirements is required (see Discussion section), the resident engineer or designated staff will save documentation within the project folder. If the contractor fails to meet any of the specification requirements, the resident engineer will notify the contractor and ensure they take corrective action for the non-conformities.

If required as outlined above, the bureaus of Construction Management will regularly place the completed forms and checklists and compliance documents such as compliance plans (see procedure 11-06-09 Clean-Construction- Ordinance) in the project file's Construction Management folder. Copies of this documentation will be provided to Site Assessment, and to Remediation and Regulatory Affairs on a quarterly basis for each project in construction and at project closeout by the resident engineer (see procedure 19-01-01 Regulatory Affairs Database).

Attachments:

 [Pre construction Environmental Checklist Ver2021.05.07.pdf](#)

 [Standard Construction Measures - RE Ver2021.05.07.pdf](#)

 [Standard Construction Measures - Inspector Ver2021.05.08.pdf](#)

 [11-06-08 Process for documenting compliance with environmental commitments during construction.pdf](#)

**Volume**

## 19 Environmental Management

### Chapter

19-01-0 Environmental and Regulatory Compliance Information Management

### Procedure Number

19-01-02 Environmental Management Quality Control

### Procedure Revision Number

REV 01

### Responsible Manager

[Deunert, Boris \(DPW\)](#)

### Purpose

In order to embrace continuous improvement and best practices within the Public Works environmental management system, Public Works will conduct regular quality-control reviews of the system.

### Policy

The Regulatory Affairs (RA) Section manager will perform regular audits of the environmental management system, both internally within RA and externally within the rest of Public Works, and report the results to the Design and Engineering manager. The goals of the quality-control process shall be to preserve and promote efficiencies, identify corrective measures for inefficiencies and lacunae, and generally enable process improvement.

### Discussion

Public Works' Strategic Goal #2 is to "drive innovation and exception service." Object 2A is to "Embrace continuous improvement and best practices." This procedure extends this strategic vision to the operations of the environmental management system. Regulatory Affairs (RA) section serves as the Public Works' environmental hub for compliance, in which they are responsible for the tracking and management for all documentation and milestones required for NEPA (National Environmental Policy Act) and CEQA (California Environmental Quality Act) compliance, as well as regulatory permitting.

### Procedure

1. The RA section manager is responsible for performing regular audits of Public Works' environmental-management processes and of the extent to which Public Works is in conformity with its stated environmental procedures and objectives, and producing a report that presents his or her findings. Reviews include quantification of compliance with all applicable laws and regulations; determination whether adequate screening for all projects has been conducted; investigation of non-conformities within environmental management, with recommendations for corrective measures; and strategic assessment of legal or regulatory issues related to environmental management. Managers of sections that participate in activities subject to CEQA, NEPA, and/or state, local and federal

environmental laws and regulations are responsible for complying in a timely manner to informational requests submitted to them by the RA manager pursuant to this procedure.

2. Audits shall be conducted once a year, as directed by the Design and Engineering manager. The Design and Engineering manager may, at his or her discretion, specify a longer interval between audits.

**Volume**

19 Environmental Management

**Chapter**

19-01-0 Environmental and Regulatory Compliance Information Management

**Procedure Number**

19-01-01 Regulatory Affairs Database

**Procedure Revision Number**

REV 01

**Responsible Manager**

[Deunert, Boris \(DPW\)](#)

**Purpose**

To develop and maintain an electronic database system for regulatory affairs management.

**Policy**

Public Works shall develop and maintain an electronic database system (regulatory affairs management system, or RAMS) that:

- Standardizes processes used to manage Regulatory Affairs (RA) activities by reflecting and supporting the Regulatory Affairs environmental-review workflow, including funds allocation.
- Supports and reinforces individual and functional roles, responsibilities, and authorities in environmental review and compliance by encoding them into the database tracking and alerts system.
- Provides storage and retrieval of environmental documentation and associated metadata.
- Provides reporting of sufficient sophistication to allow for project-level to department-wide assessment of the effectiveness of Public Works' efforts at compliance with City, state, and federal environmental laws and regulations.
- Provides a way for Project Management to request work and work products from Regulatory Affairs.

- Provides a method for Construction Management to upload documentation of environmental-commitment compliance during construction.

To the maximum extent feasible, RA processes, including all processes described in Procedure 10-01-04 (Environmental Review) will be conducted in and recorded by the database. Project managers (PMs) and Construction Management (CM) staff shall use RAMS for information submittal and retrieval to the maximum extent feasible.

## **Discussion**

Regulatory Affairs shall be responsible for providing business requirements and workflow description to Public Works Information Technology, and for using the database to record, track, and verify project environmental-compliance processes and store documentation.

Public Works Information Technology shall be responsible for the maintenance of the database.

RAMS entries are requests for RA to do work. The person entering the project must be able to provide funding if necessary and is responsible for the accuracy of information provided to RA in the project entry, and for fulfilling any environmental commitments which are generated through the environmental-review process. PMs may delegate their responsibilities to others by sharing their personal login credentials, but the project manager remains responsible for any actions taken by their delegate while that person is logged into the system using the PM's credentials.

## **Procedure**

1. Project managers start the environmental review process through submittal of project information via the RAMS database project-entry system, answering all questions and completing all fields applicable to the project, as directed by RA. All Public Works-sponsored projects are entered into RAMS by 30-40% total completion of design, unless prior arrangement has been made with RA. This includes tenant improvements and other small projects as well as projects presumed statutorily or categorically exempt from CEQA. Master contracts and each individual sub-contract are entered separately.

2. For projects sponsored by other departments, the timing of the RAMS entry is as follows:

a. Other departments' projects constructed under Public Works contract with other departments' own CEQA exemption or document and a Public Works project manager.

- These are entered into RAMS by the project manager by the time the CEQA determination is issued, with an allowance made for time for RA to complete its QA/QC process.
- The PM must provide the CEQA documentation, and the other department's standard construction measures (see Procedure 10-01-04 Environmental-Review) if applicable, concurrently.
- If the project has a CEQA statutory exemption, a project description adequate to understand which SCMs are required must also be supplied by the PM.

b. Other departments' projects constructed under Public Works contract with another project's own CEQA document and no Public Works project manager.

- These are entered into RAMS by the project lead by the time the CEQA determination is issued, with an allowance made for time for RA to complete its QA/QC process. As the project lead has limited ability to provide funding, enforce environmental commitments, etc., this type of project can be entered once a prior agreement is in place between the project sponsor and RA as to how these obligations will be met.
- The CEQA documentation and the other department's standard construction measures applicable to the project are provided by the PM concurrently.
- If the project has a CEQA statutory exemption, a project description adequate to understand which SCMs are required must also be supplied by the PM.

c. Other departments' projects that are constructed by another contract.

- These are entered at the point at which plans requiring review for compliance with Public Works Orders 201,954 and 172,596 are ready for review (ideally no later than 90%).
- All entries are accompanied by a filled-out Maher screening form to be uploaded regardless of the extent or absence of ground disturbance, and a filled-out copy of the quality assurance plan form uploaded with Section 1 (Project Information) completed and space available for RA's comments.
- RA will provide a fee proposal through RAMS to fund coordination for environmental review and/or for completion of the Environmental Commitments Record and QA/QC. See Procedure 10-01-04 (Environmental Review) and review Procedure 10-01-05 (Quality Assurance Plan). The proposal must be accepted in RAMS and be funded before coordination/review can continue. Projects that are screened out as not requiring any coordination or QA/QC by RA will be processed by RA on overhead and generate no fees for the PM.
- During environmental review, RA uses RAMS to manage the storage and retrieval of documents associated with and generated by environmental-compliance activities, with associated metadata, and make final versions of the documents available to project managers via each project's summary page. Requirements for environmental submittals to lead agencies are identified in the database and required documents, forms, etc., are stored and tracked within the database.
- RAMS also provides for scheduling of review of documents, identification of and routing to document preparers and reviewers, tracking of allotted review times, and notifications in the event that review times are exceeded. This system may be used to document the project manager's review, editing and approval of the description.
- RA uses RAMS to manage tracking of applications for applicable local, state and federal permits and of entitlements as San Francisco Planning Department's certificate of appropriateness, permit to alter, and general plan referrals, and for tracking and management of required NEPA revalidation process.

- After the receipt of CEQA exemptions and documents, permits, etc., RA uses RAMS to maintain a record of the environmental commitments (the Environmental Commitments Record (ECR)) associated with each project, including the means of realizing the commitment and the parties responsible for doing so.
- Prior to RA QA/QC review signoff, the PM completes the ECR in RAMS for all pre-construction tasks and for supplying verification, such as specific contract-specification sections, that each pre-construction ECR task has been completely addressed; confirms in RAMS that the project construction scope is consistent with the project's environmental-document's project description; records in RAMS the date and form of project CEQA approval actions and uploads data associated with the action. See Procedure 10-05-01 (Quality Assurance Plan).
- Construction Management uses RAMS to record compliance with environmental commitments during construction by uploading compliance plans, affidavits, etc., required of the contractor through environmental commitments incorporated into project specifications and by uploading documentation that all other environmental commitments incorporated into project specifications are being enforced and that the contractor is consistently in compliance with these. See Procedure 11-06-08 (Environmental Compliance in Construction).
- During and after construction, the PM enters actions taken to realize any other construction-phase ECR tasks and post-construction-phase ECR tasks into the RAMS ECR, concurrently supplying verification that each has been completely addressed. RA flags a project as complete within RAMS when there are no ECR tasks outstanding.

