2.20 VARIANTS

2.20.1 APPROACH TO VARIANTS

Comment

Sometimes the options are called variants and they comprise options regarding energy, water, air, greenhouse gasses, etc (Vol II, VI. 1-54);

Another example of options which are called variants are changes in the shape of the Ferry Terminal/Breakwater and size of the harbor and express a wide range in numbers of ferry boat berths and ferry service (Jennifer Clary, President, San Francisco Tomorrow) [38.2]

Response

As explained in the introduction to EIR Chapter VI, Project Variants, on p. VI.1, each variant modifies one limited feature or aspect of the Proposed Project. The EIR provides a project-level analysis for each variant. In this fashion, the EIR will provide the City with the information to incorporate one or more variants into the Proposed Project if it chooses to do so. The aim of this approach is to define different options for providing certain infrastructure or project features.

In contrast, Alternatives to the Proposed Project, as described and analyzed in EIR Chapter VII, provide a different approach to the Proposed Project. Alternatives are analyzed in an EIR to determine whether most of the basic project objectives can be achieved in a manner that avoids one or more of the proposed project’s significant and unavoidable environmental effects.

The separate chapter in the EIR devoted to variants is meant to reduce confusion by separating the analysis of each variant from the environmental impact analysis of the Proposed Project presented in EIR Chapter IV, Environmental Setting and Impacts. The impacts of each variant are fully disclosed and identified using this approach. (See the second response in Subsection 2.1.15, Project Details, in Section 2.1, Project Description, of this Comments and Responses document, for further discussion.)

The Ferry Terminal Breakwater Variants discussed in EIR Section VI.B would all support the same numbers of ferry vessels at full buildout. Breakwater Variant B3, however, would accommodate somewhat smaller vessels that could carry fewer passengers. As explained on p. VI.25, with implementation of Mitigation Measure M-TR-2, identified for the Proposed Project and providing for three ferry boats, Variant B3 would result in less-than-significant transportation impacts as with the Proposed Project and Measure M-TR-2.
2.20.2 WETLANDS VARIANTS AND GREENHOUSE GASES

Comment

The review should calculate and compare the Greenhouse Gas (GHG) emissions of the preferred wastewater treatment alternative with the proposed variants. That comparison should include a discussion of biosolids handling, co-generation of electricity, and the potential of constructed treatment wetlands to act as a GHG sink.

Recommendation;

Provide an accurate comparison of the traditional wastewater treatment system included in the preferred alternative with the constructed treatment wetlands in variants D1 and D2, including widely available information on the multiple benefits of the latter options (Jennifer Clary, President, San Francisco Tomorrow) [38.36]

Response

For context, as described in EIR Chapter VI, Project Variants, beginning on p. VI.38, Wastewater Wetlands Variant D1 would use constructed wetlands as part of tertiary wastewater treatment. Unrestricted public access to the wetlands would not be permitted because the effluent would not be disinfected before being discharged there. Wastewater Wetlands Variant D2 would use constructed wetlands for water polishing after disinfection, and public access to the wetlands could be permitted.

Regarding the greenhouse gas (“GHG”) issues raised in the comment, neither biosolids handling nor co-generation of electricity using digester gas are considered as variants in the EIR. EIR Chapter II, Project Description, pp. II.59-II.60, discusses possibilities regarding future biosolids handling, including co-generation using digester gas, but these possibilities are speculative, and none is a variant. (See also the response in Subsection 2.13.1.1, Wastewater Biosolids, in Section 2.13, Utilities and Service Systems, of this Comments and Responses document, regarding the discussion of biosolids in the EIR.) As these possible uses are not part of the Proposed Project or a variant, any future proposal for such uses would be subject to environmental review.

Biogenic carbon dioxide emissions result from materials that are derived from living cells and include biological matter in wastewater, decaying vegetation, and so on. Under the Bay Area Air Quality Management District’s (“BAAQMD”) CEQA guidance, biogenic carbon dioxide
emissions should not be included in the quantification of GHG emissions for a project,\(^1\) and they have properly been excluded in this EIR.

Regarding the potential of constructed treatment wetlands to act as a GHG sink, the BAAQMD CEQA guidance takes into account many types of GHG emission reductions from a project.\(^2\) Due in part to the difficulty of quantifying the carbon dioxide that would be sequestered in a treatment wetlands, the EIR analysis does not attempt to subtract such sequestration from the emissions of the wetlands under the Proposed Project, Variant D1, or Variant D2. This approach is conservative, and the difference in overall GHG emissions between the Proposed Project and Variants D1 and D2 would likely be small. As the analysis of GHG emissions in the EIR showed that the Proposed Project would not result in a significant impact (see Section IV.H, Greenhouse Gas Emissions, pp. IV.H.44-IV.H.45), any reductions that might occur as a result of sequestration by wetlands vegetation would not result in a significant impact.

Regarding the recommendation to include “widely available information on the multiple benefits of the latter options,” an EIR’s focus is to assess the adverse environmental impacts of a proposed project, rather than to assess its relative benefits of different approaches. Either with or without the implementation of Variants D1 or D2, the Proposed Project would have a less-than-significant impact on GHG emissions. The EIR does discuss at least one benefit of the wetlands, public access, under Variant D2 (p. VI.41).

\(^1\) BAAQMD, *California Environmental Quality: Act Air Quality Guidelines*, June 2010, p. 4-5 and Table 4.2 on p. 4-6, available via a link at: http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx, accessed October 26, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

\(^2\) Ibid., pp. 4-7-4-19.