

CHAPTER 4

REPORT PREPARATION

4.1 SCOPING

Input on the scope and contents of this EA was solicited from numerous federal, state, and local agencies. A list of the agencies is provided below.

- U. S. Environmental Protection Agency, San Francisco, CA
- City and County of San Francisco, Department of Public Works
- City and County of San Francisco, Environmental Review Officer
- City and County of San Francisco, Water Resources and Planning Manager
- City and County of San Francisco, Recreation & Park Department
- San Francisco County Transportation Authority
- San Francisco County Transportation Authority, Doyle Drive Environmental & Design Study
- Caltrans District 4, Program & Project Management
- Regional Water Quality Control Board, San Francisco Bay Region
- California Department of Health Services
- National Park Service, Golden Gate National Recreation Area
- State Clearinghouse, Governor's Office of Planning and Research
- Golden Gate and San Francisco National Cemetery

In addition, the State Clearinghouse notified the following agencies:

- California Resources Agency:
 - Department of Conservation
 - Department of Fish and Game
 - State Historic Preservation Office
 - Department of Parks and Recreation
 - San Francisco Bay Conservation and Development Commission
- California Highway Patrol
- Caltrans
- Department of Health Services
- California Environmental Protection Agency:
 - SWRCB: Clean Water Program
 - RWQCB, Region 2
 - DTSC
- Independent State Commissions:
 - Native American Heritage Commission
 - State Lands Commission

General public input was solicited through the park's official newsletter (the Presidio POST). An article describing the proposed project and requesting input on the scope of the EA ran in the September 2001 issue. The POST mailing list is roughly 9,000 individuals, groups and organizations (including natural and cultural preservation groups) interested in the Presidio.

4.1.1 SUMMARY OF SCOPING COMMENTS

Prior to preparation of the EA, through direct mailing and follow-up presentations, the Presidio Trust solicited the input of public agencies as to their views on any environmental impact in connection with the project. Of the more than 20 agencies invited to comment, four agencies responded. The following is a summary of the issues raised, and how they were addressed in the EA.

U.S. DEPARTMENT OF INTERIOR, NATIONAL PARK SERVICE

The National Park Service (NPS) submitted a scoping comment letter that was generally supportive of the project, noting that it complies with the objectives of the 1994 Presidio General Plan Amendment (GMPA), and recommended the following issues be addressed in the EA.

Range of Alternatives

The NPS asked that potential overlaps/conflicts with the Doyle Drive project be addressed; a discussion of the relationship of the two projects and potential conflicts is provided in Section 3.11 of the EA (Cumulative Impacts, see Land Use discussion). The NPS requested information related to the rehabilitation of the abandoned reservoir be provided; this information is presented in Chapter 2 of the EA. The NPS also suggested that an alternative relying solely on conservation be developed; aggressive water conservation will be practiced by the Trust regardless of the proposed project, and as such is included as a component of all alternatives evaluated in this EA. Chapter 2 was expanded to include a description of these practices. The No Action Alternative, which includes aggressive conservation without construction of a water recycling system, represents the alternative recommended by the NPS.

Scope of EA

Section 106 Compliance. The NPS scoping letter indicated full Section 106 consultation would be needed. Trust staff met with Ric Borjes, Chief of Cultural Resources and Museum Management, GGNRA, early in the process to review the project and discuss the appropriate level of Section 106 compliance. Based on review of the preferred alternative, and efforts to refine the project to avoid adverse impact on cultural resources, Mr. Borjes indicated that full consultation does not appear to be necessary for the project. Subsequent to the scoping process, the Trust, NPS, SHPO, and ACHP executed a Programmatic Agreement regarding 106 compliance within Area B of the Presidio. The process outlined in the Programmatic Agreement will be used to evaluate the project.

Biology & Water Quality. The NPS requested that a variety of environmental issues related to the use of recycled water including biological, water quality and groundwater effects be addressed. The scope of Sections 3.3, Water Resources, and 3.4, Biological Resources were refined to address these issues.

Future Land Uses/Public Safety. The NPS requested that the EA address any future restrictions on land uses or public safety concerns including wading areas used by the public. Under both action alternatives, product water would meet or exceed the highest level of Title 22 standards for recycled water. Permitted uses for this type of water include unrestricted body contact, use on school playgrounds and parks, and for irrigation of food crops. Use of this water at the Presidio for landscape irrigation would in no way restrict or otherwise alter current recreational or other public uses at the park.

Energy Consumption. The NPS requested that energy consumption be addressed in the EA; Chapter 2 includes a discussion of projected energy demands, by alternative.

Seismicity. The NPS requested that information relevant to seismic hazardous be incorporated into the EA; Section 3.10 of the EA addresses these issues.

Discourage Conservation. The NPS asked that the EA address whether the project would discourage conservation by making recycled water available. Water conservation efforts are *demand* management measures that would further reduce the Presidio's water use, and as described above are common to all alternatives evaluated in this EA including the No Action. Water recycling, on the other hand, is the beneficial reuse of wastewater to provide supplemental *supply*. Both are critical components in the Trust's long-term resource planning responsibilities to ensure adequate water supplies to meet the needs of both existing users and future demand for water in a sustainable manner. Due to the Trust's commitment to the conservation and efficient use of its limited water supplies, it is difficult to think of a situation whereby the project would discourage conservation as suggested. In fact, the Trust's permitting requirements for irrigation efficiency for recycled water users would actually result in further water use savings.

Crissy Water Needs. The NPS requested that the declining demand for irrigation following establishment of the grass at Crissy Field be considered. Water demands for established turf areas were used to project recycled water use needs. The Trust is aware that the currently high Crissy Field water consumption would not continue over the long-term.

Construction Impacts. The NPS requested that potential effects on vegetation and wildlife resulting from pipeline construction be addressed, and that the project should seek to avoid effects. The EA evaluates construction-related impacts, and the Trust concurs that best way to minimize environmental impact is through avoidance. Resource protection and avoidance was at the forefront of the development and subsequent refinement of both of action alternatives evaluated in this EA; this is discussed in detail in Section 3.4.

City Limits on Wastewater Flows. The NPS suggested that the Trust assess the effects of a hypothetical scenario in which the City limits its acceptance of wastewater from the Presidio in the future. The Trust has not been informed by the City of any action or potential action to limit future wastewater discharge to the City's combined sewer system. Several City departments and the San Francisco Public Utilities Commission were consulted during the scoping for this project, and this issue was never raised in their responses. Implementation of the proposed project is expected to substantially reduce the amount of annual wastewater flows conveyed to the City's combined sewer system. Under these circumstances, analyzing a speculative future limit on discharge seems unwarranted.

The comment also raises the question of "oversupply" and subsequent disposal of recycled water at the Presidio. The apparent context for such a scenario is during wet-weather periods. The City has expressed concern regarding combined sewer overflows (CSOs), which occur during wet-weather events. The Trust has and continues to take actions to reduce the amount of wet-weather flows contributed by the Presidio. Among the actions already being implemented are the ongoing rehabilitation and repair of existing infrastructure. These repairs have substantially reduced the amount of infiltration of rain (and ground) water into the sewer system. In addition, the EA evaluates additional opportunities to further reduce wet-weather flows through project operations. These opportunities would not, however, include "disposal" of recycled water on-site. Early in the planning process, the concept of routing recycled water to the Bay during wet weather (when irrigation demand is negligible) was discussed. This concept was initially considered based on its ability to reduce wet-weather flows to the City's combined sewer system, possibly to increase water available for natural habitat restoration, and the potential to improve overall quality of the water being discharged to the Bay (recycled water produced at the proposed plant would meet or exceed the highest Title 22 standards). However, the park's wastewater flows represent a fraction of a percent of the total wet weather flows), and this fact, combined with the National Park Service's opposition to this approach, and availability of other measures to minimize wet weather flows from the park, resulted in its removal from further consideration at this time.

SAN FRANCISCO PUBLIC UTILITIES COMMISSION

The SFPUC submitted a scoping letter which addresses the following issues.

Recycled Water Demands

The SFPUC raised several questions related to recycled water demands and the proposed capacity of the water recycling plant; each of these issues have been addressed Chapter 2 of the EA.

Recycled Water Use

Proposed recycled water use areas are described in Section 2.2.1. With regard to the question related to the possibility of using recycled water to maintain Lobos Creek flows, the following information is provided. Since Lobos Creek serves as the primary potable water source for the Presidio, use of recycled water within the creek channel and within the larger watershed is

specifically prohibited in the Trust's permit from the California Department of Health Services to operate the existing water treatment plant. Potential impacts to groundwater quality are discussed in Section 3.3, Water Resources. It should be noted that groundwater at the Presidio is not used as a source of domestic supply.

Recycled Water Operation

The SPFUC requested clarification on the wet weather operations of the proposed plant, treatment of sludge and other byproducts, contingency plan to meet water needs when plant is down and facility sizing, location of the proposed facilities, and an inquiry regarding consideration of smaller "package" treatment plants throughout the park. Each of these issues are addressed in Chapter 2 (see Sections 2.2 and 2.4).

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION (BCDC)

The BCDC indicated that the proposed project did not appear to raise any concerns. The agency also stated that as long proposed construction activities do not block public access to the Bay, there appear to be no issues for the BCDC.

NATIVE AMERICAN HERITAGE COMMISSION

The Native American Heritage Commission submitted a scoping letter recommending a records search and process for documenting the effects of the proposed action. A Sacred Lands File search was previously conducted for the entire Presidio, and this information, along with the results of ongoing research and monitoring conducted by Trust cultural and historic resource staff, are maintained in a GIS database for the park. This database was used in the preparation of the analysis. With regard to the format of the proposed report, the analysis is being conducted in accordance with the requirements of the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA), consistent with the existing Programmatic Agreement for implementation of the NHPA. Although the format differs slightly than a typical California Environmental Quality Act (CEQA) document, the basic components including existing conditions, impacts and mitigation (with future monitoring requirements) are addressed.

4.2 REPORT AUTHORS

This report was prepared by Environmental Science Associates (ESA) and Presidio Trust Staff.

ESA staff contributors include:

- Leslie Moulton, Project Director
- David Friedland, Project Manager, Water Resources
- Michelle Kondo Murray, Deputy Project Manager
- Yolanda Molette, Botanist
- Brian Pittman, Wildlife Biologist

- Chris Sanchez, Noise, Air Quality
- Peter Hudson, Geology & Soils
- Jennifer Schulte, Hazardous Materials
- Dennis Pascua, Traffic

Presidio Trust staff contributors include:

- Sannie Osborn, Historical Archaeologist
- Juli Polanco, Historic Compliance Specialist
- Chris Ottaway, Landscape Architect
- Sharon Farrell, Natural Resource Planner
- Ben Jones, GIS Specialist
- Mark Hurley, Project Manager
- Jim Kelly, Utilities Manager
- Allison Stone, Environmental Planner
- John Fa, Assistant Deputy Director Development

In addition, technical assistance was provided by Craig Lichty and Patrick Johnston of Kennedy Jenks Consultants.

4.3 REFERENCES

Association of Bay Area Governments (ABAG), *The San Francisco Bay Area -- On Shaky Ground*, Publication Number P95001EQK, 1995.

Association of Bay Area Governments, *Manual of Standards for Erosion and Sediment Control Measures*, May 1995.

Association of Bay Area Governments, *Carbon Monoxide Maintenance Plan*, 1994.

Association of Bay Area Governments, *Ozone Attainment Plan*, 1999.

Bay Area Air Quality Management District (BAAQMD), *Bay Area 2000 Clean Air Plan*, 2000.

Boehmer, Ed, Enforcement Officer, Bay Area Air Quality Management District, telephone communication, November 14, 2001.

Bolt, B., *Earthquakes*, W.H. Freeman and Company, New York, New York, 1988.

California Building Standards Commission, *California Building Code, Title 24, Part 2*, 1995.

California Code of Regulations, Title 22, Division 4.5 "Environmental Health Standards for the Management of Hazardous Wastes," Chapter 11, Article 3 (Characteristics of Hazardous Waste), Sections 66261.20-24.

California Department of Fish and Game (CDFG), California Natural Diversity Data Base for 7.5 minute topographic quadrangle San Francisco North, May 2000. Accessed November 2001.

California Division of Mines and Geology, *Guidelines for Evaluating the Hazard of Surface fault Rupture*, CDMG Note 49, 1997.

- California Division of Mines and Geology, *Guidelines for Evaluating and Mitigating Seismic Hazards in California*, CDMG Special Publication 177, 1997.
- California Division of Mines and Geology, *Seismic Hazard Zones, City and County of San Francisco*, November 17, 2000.
- California Division of Mines and Geology, *The Loma Prieta (Santa Cruz Mountains), California, Earthquake of 17 October 1989*, Special Publication 104, 1990.
- California Health and Safety Code, Chapter 6.5, Hazardous Waste Control, Section 25151.
- California Native Plant Society (CNPS), CNPS Electronic Inventory for 7.5 minute topographic quadrangle San Francisco North. Accessed November 2001.
- Castellini, L, Draft Presidio of San Francisco Wetland Delineation: U.S. Army Corps of Engineers Jurisdictional Wetlands in Area B. Prepared for The Presidio Trust and the Golden Gate National Recreation Area, 2001.
- Chasse, M. June 2001. New rare plant population found. California Native Plant Society Yerba Buena News, Yerba Buena News:Vol.15, No.2
- City and County of San Francisco (CCSF), *Final Urban Water Management Plan for the City and County of San Francisco Public Utilities Commission*, February 2001.
- City and County of San Francisco (CCSF), *San Francisco Recycled Water Master Plan and Groundwater Master Plan Final Environmental Impact Report*, August 1997.
- Cowardin, L.M., Carter, V., Golet, F., and Roe, E.T. Classification of Wetlands and Deepwater Habitats of the United States. United States Fish and Wildlife Service, 1979.
- Dames & Moore, *Landscape and Irrigation Management Plan, the Presidio, San Francisco, California*, June 1996.
- Dames & Moore, *Presidio of San Francisco, Storm Water Management Plan*. Prepared for the National Park Service, Department of the Interior. October 1994.
- Dames & Moore, *Wetland and Riparian Corridor Restoration and Feasibility Study, Presidio of San Francisco, National Park Service*, February 1995.
- Debroux, Jean, Ph.D., Associate Engineer, Kennedy/Jenks Consultants, personal communication, February 2002.
- Environmental Protection Agency (EPA). 2000. Endocrine Disruptor Screening Program, Report to Congress. August 2000.
- Feickert, Mark, Presidio Trust, personnel communication, December 6, 2001.
- Ford, George, Presidio Trust Remedial Construction Manager, personnel communication, December 3, 2001.
- Fromath, Jay, coordinator, Water Quality Specialists, telephone communication, November 28, 2001.

- Gilbert and Dolan, *A Guide to Cultural Landscape Reports*, 1998.
- Goals Project, 2000. *Baylands Ecosystem Species and Community Profiles: Life histories and environmental requirements of key plants, fish and wildlife*. Prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. P.R. Olofson, editor. San Francisco Bay Regional Water Quality Control Board, Oakland, Calif.
- Golden Gate National Recreation Area (GGNRA), *Wetland Vegetation Occurring in the Presidio, CA*, Prepared by Lara Wood, 1999.
- Hart, E. W., *Fault-Rupture Hazard Zones in California: Alquist-Priolo Special Studies Zones Act of 1972 with Index to Special Studies Zones Maps*, California Division of Mines and Geology, Special Publication 42, 1990, revised and updated 1997a.
- Holland, R. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game, The Resources Agency. 156 p.
- International Conference of Building Officials, Uniform Building Code, ICBO, Whittier, California, 1997.
- Jennings, C. W., *Fault Activity Map of California and Adjacent Areas*, California Division of Mines and Geologic Data Map No. 6, 1:750,000, 1994.
- Jones and Stokes Associates, Inc., 1997. Presidio of San Francisco natural resource inventory and vegetation management options. November (JSA 93-168.) Prepared for Golden Gate National Recreation Area, National Park Service, San Francisco, CA.
- Kennedy Jenks Consultants, 2002. *Water Recycling Project Plan*. Prepared for the Presidio Trust. March 2002.
- Lo, Doris, U.S. EPA Environmental Protection Specialist, personal communication, March 2002.
- Mayer, K.E. and W.F. Laudenslayer (eds.). 1988. A guide to wildlife habitats of California. California Department of Fish and Game. Sacramento, CA. 166 p.
- Monroe, Mia, National Park Service, personal communication, February 2002.
- Moore, Richard, Superintendent, Citizens Water Resource, telephone communication, November 27, 2001.
- Munz, P.A. and D.D. Keck. 1970. A California Flora with Supplement, University of California Press. Berkeley, CA. 1,905 pp.
- National Institute for Occupational Safety and Health and Occupational Safety and Health Administration, *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, October 1985.
- National Park Service, *Special Status Species Monitoring for the Golden Gate National Recreational Area*. San Francisco, California [unpublished], 2000.

- National Park Service, *Environmental Assessment: Restoration Plan for Lobos Creek, Presidio of San Francisco, California*. Prepared for the U. S. Department of the Interior, National Park Service, Golden Gate National Recreation Area, By Harding Lawson Associates, Novato, California. 1996.
- National Park Service, *Final General Management Plan Amendment Environmental Impact Statement, Golden Gate National Recreation Area, Presidio of San Francisco*, July 1994.
- National Park Service, *Historic Buildings of the Presidio: Physical History Reports* (no date).
- National Park Service and Presidio Trust (NPS), *Final Presidio Vegetation Management Plan for the Golden Gate National Recreational Area*. San Francisco, California, 2001.
- National Park Service and Presidio Trust (NPS), *National Historic Landmark Update*. San Francisco, California, 1993.
- Oakeshott, Gordon B., *California's Changing Landscapes*, McGraw-Hill Publishing Company, 1978.
- Peccia, Robert and Associates, *Presidio Traffic Update Report*, December 1996.
- Peccia, Robert and Associates, *Presidio Bus Management Plan – Support Document, summary and Analysis of Data collected in 1998*. March 1999.
- Peterson, M.D., Bryant, W.A., Cramer, C.H., *Probabilistic Seismic Hazard Assessment for the State of California*, California Division of Mines and Geology Open-File Report issued jointly with U.S. Geological Survey, CDMG 96-08 and USGS 96-706, 1996.
- Philip Williams and Associates, Ltd., Harding Lawson Associates, Inc., and KCA Engineers. *Restoration Plan for Lobos Creek*. Prepared for the Golden Gate National Recreation Area, San Francisco, California. December 1995.
- Presidio Trust, *Final Environmental Impact Statement and Planning Guidelines, Letterman Complex*, Presidio of San Francisco, San Francisco, California, March 2000.
- Presidio Trust, *Presidio Trust Implementation Plan (PTIP) Draft Environmental Impact Statement*, Presidio of San Francisco, San Francisco, California, July 2001.
- Presidio Trust, *Presidio Trust Implementation Plan (PTIP)* Presidio of San Francisco, San Francisco, California, July 2001.
- San Francisco County Transportation Authority (SFCTA), *Doyle Drive Environmental and Design Study, Hydrology and Water Resources Technical Report*, prepared by Baseline Environmental Consulting May 2001.
- San Francisco Public Utilities Commission. *Final Urban Water Management Plan for the City and County of San Francisco Public Utilities Commission*. February 2001.
- Stebbins, R.C., *A Field Guide to Western Reptiles and Amphibians*, Boston, Mass: Houghton Mifflin Co., 1985.

Stigmiller, Martin, Coordinator, Arapahoe County Water & Wastewater Authority, telephone communication, January 2, 2002.

Stormwater Quality Task Force, *Municipal Best Management Practice Handbook*, prepared by Camp Dresser & McKee, Larry Walker Associates, Uribe and Associates, and Resource Planning Associates, March 1993.

Tatarian, Trish, Principal, Wildlife Research Associates, personal communication, February 2002.

Tucker, Dave, Supervisor, City of San Jose / Santa Clara Wastewater Treatment Plant. Personal communication with Brian Pittman, January 3, 2002.

U. S. Environmental Protection Agency, *Process Design Manual, Land Treatment of Municipal Wastewater*, October 1981.

U.S. Geological Society (USGS) Working Group on California Earthquake Probabilities (WG99), *Earthquake Probabilities in the San Francisco Bay Region: 2000-2030 – A Summary of Findings*, Open-File Report 99-517, 1999.

United States Department of Agriculture Natural Resource Conservation Service, formerly the Soil Conservation Service (SCS) (USDA NRCS), *Report and General Soil Map*, San Francisco and San Mateo County, 1969.

Urban Watershed Project, *Lobos Creek Water Quality Management Plan*. Prepared for Resource Management and Planning, Golden Gate National Recreation Area, U. S. National Park Service. 2001.