HARDING PARK RECYCLED WATER PROJECT

Response to Comments/
Final Environmental Impact Report
SCH No. 2009-012004

Prepared for
The City of Daly City

October 2009
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CHAPTER 1
Introduction

1.1 Purpose of the Final Environmental Impact Report

This report has been prepared to accompany the draft environmental impact report (DEIR) for the City of Daly City’s (Daly City) Harding Park Recycled Water Project. The DEIR identified the environmental consequences associated with construction and operation of potential alternatives identified by Daly City, and recommended mitigation measures to reduce significant and potentially significant impacts. This document responds to the comments on the DEIR and makes revisions to the DEIR, as necessary, in response to these comments. Together with the DEIR, this document constitutes the Final EIR (FEIR) for the project.

The Final EIR is an informational document prepared by the lead agency that must be considered by decision-makers before approving or denying a proposed project. California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify the following:

The Final EIR shall consist of:

(a) The Draft EIR or a revision of the draft.
(b) Comments and recommendations received on the Draft EIR, either verbatim or in summary.
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
(d) The responses of the lead agency to significant environmental points raised in the review and consultation process.
(e) Any other information added by the lead agency.

This document has been prepared pursuant to the CEQA Guidelines.

1.2 Environmental Review Process

On July 27, 2009, Daly City (lead agency) released the Harding Park Recycled Water Project DEIR for public review (State Clearinghouse No. 2009012004). The public review and comment period on the DEIR began on July 27, 2009 and closed on September 10, 2009. Daly City anticipates certifying the Final EIR (a finding that the EIR complies with the requirements of CEQA) at a regularly scheduled North San Mateo County Sanitation District Board meeting scheduled on
October 12, 2009. Following EIR certification, Daly City may proceed with consideration of project approval actions.

1.3 Report Organization

Chapter 2 of this document contains copies of comments received during the comment period and responses to those comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow that letter. The comments are referenced alphanumerically by letter and comment number. Where a response includes a change to the text of the DEIR, a reference is made to Chapter 3, which contains corrections and clarifications made to the DEIR text.

The following is a list of all persons and organizations that submitted comments on the DEIR during the comment period:

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<th>Letter Number</th>
<th>Company</th>
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<tr>
<td>A</td>
<td>California Department of Transportation</td>
<td>Lisa Carboni, District Branch Chief</td>
</tr>
<tr>
<td>B</td>
<td>California Regional Water Quality Control Board, San Francisco Bay Region</td>
<td>William B. Hurley, PE, Senior Engineer</td>
</tr>
<tr>
<td>C</td>
<td>San Francisco State University</td>
<td>Wendy Bloom, Campus Planner</td>
</tr>
<tr>
<td>D</td>
<td>State Water Resources Control Board</td>
<td>James Hockenberry</td>
</tr>
<tr>
<td>E</td>
<td>Bay Area Water Supply and Conservation Agency</td>
<td>Nicole M. Sandkulla, PE, Senior Water Resources Engineer</td>
</tr>
<tr>
<td>F</td>
<td>Lake Merced Golf Club, San Francisco Golf Club, and The Olympic Golf Club</td>
<td>Robert Maddow (Bold, Polisner, Maddow, Nelson &amp; Judson)</td>
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Chapter 3 of this document contains changes and additions to the DEIR text. Chapter 4 contains the Mitigation Monitoring and Reporting Program.

1.4 Draft EIR—Public Review

The Draft EIR was circulated to local, state, and federal agencies and to interested organizations and individuals to allow them to review and comment on the report. Publication of the Draft EIR marked the beginning of a 45-day public review period, which extended from July 27, 2009 to September 10, 2009 and during which written comments were accepted. Copies of the Draft EIR were available for review at public locations in San Francisco and Daly City and online at: www.dalycity.org and www.sfwater.org.

A Public meeting on the Draft EIR to accept written or oral comments was held on August 12, 2009, 7:00 pm at Larcombe Clubhouse, 99 Lake Merced Boulevard, Daly City. One person attended the meeting. No comments addressing the adequacy of the Draft EIR content were raised.
at the meeting; several clarifying questions regarding the Water System Improvement Program (WSIP) recycling and conservation levels were discussed.

### 1.4.1 Comments and Responses Document and Final EIR

Written and oral comments received in response to the Draft EIR are addressed in this Comments and Responses document. The Draft EIR and the Comments and Responses document together constitute the Final EIR. Daly City is scheduled to consider certification of the EIR on October 12, 2009 and, assuming the EIR certified, approve the project.

CEQA requires the adoption of findings prior to approval of a project where a certified EIR identifies significant environmental effects (CEQA Guidelines, Sections 15091 and 15092). As part of the Harding Park Recycled Water Project approval process, Daly City will adopt the CEQA Findings, which describe the findings of fact and decisions regarding mitigation measures and alternatives, and provide a statement of overriding considerations for significant impacts identified by the EIR that cannot be mitigated to less-than-significant levels (CEQA Guidelines, Section 15093[b]).

As a responsible agency, the SFPUC will take its own discretionary project approval actions. Following certification of the EIR by Daly City, the SFPUC will consider approval of an agreement with Daly City to construct, operate and maintain the new pipeline, storage tank and pump station associated with the project. SFPUC will also consider entering into a Memorandum of Understanding with the San Francisco Recreation & Park Department on the operation and maintenance of the project facilities, and approving project funding to retain a contractor to build project infrastructure. In addition, the SFPUC will seek, or facilitate for the contractor, local permits necessary to implement the project. As part of its approval, the SFPUC would adopt CEQA Findings as described above, and will consider and adopt feasible alternatives or mitigation measures that would mitigate or avoid environmental effects of those parts of the project that the SFPUC will carry out, finance or approve.

### 1.4.2 Mitigation Monitoring and Reporting

At the time of project approval, CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment” (CEQA, Section 21081.6; CEQA Guidelines, Section 15097). The mitigation measures identified and presented in this EIR will form the basis of the Harding Park Recycled Water Project Mitigation Monitoring and Reporting Program (MMRP). All measures adopted by Daly City as conditions for approval of the program will be included in the Harding Park Recycled Water Project MMRP to ensure compliance.
CHAPTER 2
Comments and Responses
A-1 The commenter has advised that any work or traffic control (i.e., signage pertaining to delays or lane closures, flaggers, heavy trucks or wide load usage) within the State Right-of-Way (ROW) requires an encroachment permit that is issued by the Department of Transportation. The proposed Project will not include any construction work within a State ROW (i.e., State Route 35 [Skyline Boulevard], Highway 1 or Interstate 280), and neither Daly City nor the City and County of San Francisco anticipates the need for signage or other traffic control features within a State ROW. If traffic control is necessary within any of the State ROWs in the project area, the contractor will be required to get an encroachment permit from Caltrans and to comply with traffic control requirements therein.
Letter B – California Regional Water Quality Control Board, San Francisco Bay Region

B-1 The commenter has noted that the City and County of San Francisco has a small separate stormwater sewer system around Lake Merced with a storm drain along Lake Merced Boulevard and that requirements for discharging to this separate sewer system will differ from requirements for discharging to the combined sewer system. This small separate stormwater sewer system discharges into Lake Merced. Unlike San Francisco’s combined sewer system, which treats and disinfects wastewater prior to discharge into a water body, the small separate stormwater sewer system does not treat or disinfect stormwater prior to discharge into Lake Merced. Consequently, the SFPUC and Daly City will prohibit discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system. Section 3.12, Hydrology and Water Quality, Mitigation Measures 3.12-1a and 3.12-1b state that a Storm Water Pollution Prevention Plan (SWPPP) will be implemented and best management practices (BMPs) will be followed. The objectives of the SWPPP are to identify pollutant sources that may affect the quality of stormwater discharge and to implement BMPs to reduce pollutants in stormwater discharges. One of the SWPPP’s BMPs will prohibit the discharge of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system. As part of the requirements of Article 4.1 of the San Francisco Public Works Code, the contractor will implement the BMPs described in the Mitigation Measure 3.12-1b.

On page 3.12-15 the following bullet has been added to Mitigation Measure 3.12-1a:

- Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.

On page 3.12-16 the following bullet has been added to Mitigation Measure 3.12-1b:

- Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.
Letter C – San Francisco State University

C-1  Comment noted.

C-2  In response to this comment Table 5-1 on page 5-8 is revised as follows (new language is underlined; deleted language is indicated by strikethrough):

Utility work on the Creative Arts Building anticipated for August 2010 through January 2011.

On page 5-13 the following text has been revised:

The coordinated plan will include measures that address overlapping construction schedules and activities, truck arrivals and departures, land closures and detours, and the adequacy of on-street staging requirements.

Table 5-1 on page 5-8 the following text has been revised:

SF State SU
Letter D – State Water Resources Control Board

D-1  Comment noted. The project proponents will not be applying for funding through the Clean Water State Revolving Fund Program and therefore CEQA-plus environmental documentation will not be completed for this project.

D-2  As analyzed in Section 3.10 Biological Resources and specifically on page 3.10-4, no species protected under the federal or state endangered species acts are expected to occur in the proposed project area; therefore, no consultation with the US Fish and Wildlife Service, or CDFG pursuant to Section 2080.1 of the Fish and Game Code, is anticipated.
Letter E – Bay Area Water Supply and Conservation Agency

E-1 In response to this comment, the text on page 1-1, Section 1.2 has been modified as follows:
The proposed Harding Park Recycled Water Project (“Project”) is one of the projects funded through the WSIP bond measure Proposition A (Assembly Bill No. 1823).

E-2 The commenter recommends that the applicable SFPUC Construction Measures established for all Water System Improvement Program (WSIP) projects be identified in this EIR. The SFPUC Construction Measures, which originated in the WSIP PEIR, were reviewed during preparation of the Harding Park Recycled Water Project Draft EIR, because the project is a WSIP project. Some of the measures (e.g., implementation of archeological surveys) were implemented as part of environmental investigations for the Harding Park project; others were refined or replaced with appropriate project-specific measures, as indicated below.

- The Neighborhood Notice Construction Measure is integrated into the Section 3.9, Public Utilities and Services Mitigation Measure 3.9-3h
- The Seismic and Geotechnical Studies Construction Measure was achieved with the Geotechnical Study for Harding Park Recycled Water Project, prepared by Fugro West, Inc. for Carollo Engineers
- The On-Site Air and Water Quality Measures during Construction was outlined in Section 3.12, Hydrology and Water Quality Mitigation Measure 3.12-1a requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP)
- The Groundwater Construction Measure is addressed in Section 3.12, Hydrology and Water Quality, Mitigation Measure 3.12-3 for dewatering activities
- A Traffic Control Plan is required in Section 3.5, Transportation and Traffic, Mitigation Measure 3.5-1
- Local noise ordinances will be complied with as stipulated in Section 3.6, Noise, Mitigation Measure 3.6-1
- Hazardous Materials Construction Measures are addressed in Section 3.13, Hazards and Hazardous Materials, Mitigation Measure 3.13-1
- Cultural Resources Construction Measure for accidentally discovered buried or submerged cultural resources are addressed in Section 3.4, Mitigation Measures 3.4-1 and 3.4-2
- Under the Project Site Construction Measure, the staging area along John Muir Drive is sited on SFPUC-owned land. Nighttime lighting is addressed in Section 3.3, Aesthetics, Mitigation Measure 3.3-a

E-3 The commenter states that the SFPUC has established greenhouse gas reduction actions for all projects that would be implemented as part of the WSIP.
As part of the design for the proposed pump station, SFPUC has consulted with the SFPUC Power Enterprise’s Energy Efficiency Group to incorporate all applicable energy efficiency measures related to the irrigation pumps and building.

The following actions have been incorporated into Chapter 2, Project Description, page 2-33:

- The SFPUC is committed to the following GHG reduction actions as part of the WSIP program. As part of project approval the SFPUC will include the following Greenhouse Gas reduction actions in the contract specifications
  - The SFPUC will require that all contractors maintain tire inflation to the manufacturers’ inflation specifications.
  - The SFPUC will implement a construction worker education program for all WSIP projects.

E-4 The following text has been revised on page 3.1-1 as follows:

The proposed Project is a component of the SFPUC Water System Improvement Project (WSIP). As such, implementation of the proposed Project would contribute to meeting overall WSIP goals and objectives to reduce San Francisco retail purchases from the regional water system watersheds to 81 mgd by 2018, particularly that of 58 mgd of conservation savings and water recycling by year 2030. In order to meet this goal, the SFPUC plans to meet or offset 10 mgd of its retail demand in San Francisco through a combination of conservation, recycled water, and groundwater projects including the proposed Project.
Letter F – Lake Merced Golf Club, San Francisco Golf Club, Olympic Golf Club

F-1 Comment noted

F-2 Comment noted. Pursuant to the agreement described by the commenter, Agreement for Purchase and Sale of Recycled Water between the City of Daly City, and the North San Mateo County Sanitation District, Olympic Club, Lake Merced Golf Club, San Francisco Golf Club, and the City and County of San Francisco, by and through the San Francisco Public Utilities Commission (Agreement), dated March, 2002, Section 9 stipulates the Clubs’ (Olympic, Lake Merced, and San Francisco Golf Clubs) priority for use of recycled water over other potential users. The priority of use by the Clubs is noted in the Harding Park Draft EIR Project Description (pages 2-4 and 2-25). The proposed 700,000-gallon storage tank for Harding Park is sized to allow Daly City to provide the level of service required for Harding Park irrigation while also upholding its commitments to the Clubs in the Agreement. Furthermore, the Draft Operating Agreement between SFPUC and Daly City requires that SFPUC provide SFPUC system water on a standby basis in the event that recycled water is not available for Harding Park irrigation.

F-3 The commenter expresses concern about the potential for the proposed Project to add wear-and-tear to the facilities needed to serve the Clubs under the existing Agreement. The North San Mateo County Sanitation District (NSMCSD) recycled water treatment plant is designed to provide a level of service of 2.77 million gallons per day (mgd) without any additional capacity improvements as stated on page 2-9 in the Project Description. The Draft Operating Agreement between SFPUC and Daly City will include provisions regarding the price of water for Harding Park, which anticipates capture of costs for depreciation of facilities (i.e., wear and tear). In addition, there are inherent redundancies in the system (e.g. standby pumps) so that back-up equipment is in place were any facilities to break down.

As indicated in the Draft EIR (pp. 3.9-5 and 3.9-6), implementation of the project would not result in any significant physical impacts on the environment related to the provision of wastewater services or create the need for new or expansion of existing wastewater treatment facilities.

F-4 As described in the Project Description, the existing recycled water facility uses the SCADA system for information and control commands to coordinate the distribution of recycled water to its customers. The instrumentation and control system is programmed to protect the priority of the users (i.e. the Clubs). In addition, isolation valves will release water to customers based on priority and the valves will close when the demands are fulfilled. With these controls in place there are no operational uncertainties regarding priority.
F-5 The commenter suggests that a new agreement be created between Daly City, the SFPUC and the Clubs that deals solely with the proposed Project. Please refer to Responses F2 - F4. For the reasons stated in those responses, such an agreement would not be required for approval for the Harding Park project to go forward.

F-6 Comment noted. Daly City and the SFPUC are engaged in water resources planning efforts for the Westside Groundwater Basin and specifically in the Lake Merced area; these planning efforts are described briefly in Chapter 5 of this EIR.

F-7 The tertiary facilities expansion project, briefly described on page 5-6 Chapter 5, is not associated with the Harding Park Project and is not contingent on nor required for Harding Park project approval. The facilities, if expanded, will allow the delivery of recycled water for irrigation uses such as landscaping and irrigation of cemeteries in the Town of Colma. Should the facility be expanded, it will provide additional redundant capacity to protect the Clubs’ existing priority right under the Agreement between Daly City/SFPUC and the Clubs while also meeting this additional demand south of the NSMCSD plant for recycled water.

F-8 The comment suggests that Daly City consider potential future stormwater facilities identified in the cumulative section as “a cost-effective alternative to use of recycled water for Harding Park irrigation” ... as “a means to protect the contractual commitments that Daly City made to the Clubs, and perhaps to serve recycled water to other potential users....”

As described in Draft EIR Chapter 5 (Table 5-1, p.5-6, and p.5-11), Daly City is engaged in a planning effort, the Vista Grande Drainage Basin Alternatives Analysis, to address stormwater flooding issues. The purpose of Vista Grande Drainage Basin project is to avoid property damage through the development of facilities to convey intermittent, large volumes of stormwater away from residences. Currently, Daly City is considering various alternative strategies and designs; the specific locations of facilities and nature of the improvements is still under development. The alternative analysis is not focused on the potential uses of stormwater.

Draft EIR Chapter 4 (p.4-2) describes the application of CEQA requirements for alternatives evaluations to the proposed project. As indicated, appropriate alternatives are those that are feasible and meet most of the basic objectives of the project, avoid or substantially lessen significant environmental impacts of the proposed project, and foster informed decision-making and public participation. The specific concern of the commenter, the contractual commitments that Daly City made to the Clubs, was not considered in the alternatives analysis because it was not identified, and is not now identified, as an impact of the project for reasons stated in other responses to this letter. Whether an alternative involving re-use of storm water as an irrigation supply for the Harding Park golf course could meet most of the project’s basic objectives (develop a reliable, drought-resistant supply of 0.39 mgd [average daily demand] irrigation supply, diversify San Francisco’s water portfolio, and reduce the use of potable water and groundwater for irrigation and
other non-potable uses) is uncertain given the level of development of the Vista Grande project as of the date of this report (October 2009). Stormwater as a supply source would not be as reliable and drought-tolerant as recycled water because the supply would be subject to variations in annual rainfall.

An analysis of a stormwater alternative would require an investigation into the necessary infrastructure to store, treat, and distribute recovered stormwater and to resolve operational and water quality issues (e.g., provision of irrigation water year-round with an intermittent supply; treatment of stormwater run-off for irrigation). At a minimum these facilities would include a large storage tank (or use of a storage facility developed for the Vista Grande project), treatment facilities (or use of the NSMCWD facilities and attendant pipelines), construction of pipelines (to divert stormwater from existing stormdrains to the storage facility, to convey treated water to Harding Park, as proposed under the project), and a pump station to pump the stored water out of the storage tank. The magnitude of environmental impacts associated with construction and operation of these facilities would likely be greater than those associated with the facilities proposed as part of the project, and none would likely be avoided or lessened. Until the Vista Grande project is further developed, its feasibility as an alternative to the proposed project cannot be fully ascertained. For these reasons—uncertainty in meeting project objectives, uncertain feasibility, and likely inability to reduce project impacts—a stormwater alternative is not considered a viable CEQA alternative to the proposed project at this time. Daly City may consider conservation and re-use of stormwater stored as part of a Vista Grande project in the future.

The premise of the Harding Park Recycled Water Project was based on the recommendation of the SFPUC’s Water System Improvement Program, which recognized that there is an excess capacity of recycled water available from the North San Mateo County Water District recycled water facility. This comment is premised on the assertion that Daly City will not be able to honor its contractual commitments to the Clubs and, therefore, should consider developing an alternative supply. For reasons stated in Responses F2-F7, Daly City does not anticipate any difficulty with meeting its contractual commitments to the Clubs. In addition, the Draft Operating Agreement between SFPUC and Daly City requires that SFPUC provide SFPUC system water on a standby basis in the event that recycled water is not available for Harding Park irrigation, further assuring primacy of the Clubs’ recycled water supply.

F-9 Daly City does not believe that adding Harding Park to the demand on the recycled water facility will increase the Clubs’ likelihood of needing to rely on groundwater. As described above in Responses F2-F4 and throughout the EIR, Daly City will honor priority for recycled water use as stipulated in the existing agreement with the golf clubs. The Harding Park project design includes a 700,000 gallon storage tank as well as required public health provisions to maintain the Park’s existing connection to its potable water pipeline as a back-up if the supply of recycled water surpasses the demand on a peak day. The Draft
Operating Agreement between Daly City and the SFPUC anticipates the inclusion of potable supply as a back-up for irrigation at Harding Park.

F-10 Regarding the comment on the “conjunctive use” project and its cumulative affect on the availability of groundwater for the Clubs should they require it as a back-up supply, Daly City acknowledges the commenter is referring to the Regional Groundwater Storage and Recovery Project. This project is described briefly on page 5-7 as a project consisting of the construction of 16 groundwater wells with a total capacity of 7.2 mgd. Under the proposed program, stored groundwater would be extracted from the South Westside Basin groundwater aquifer during water shortages in order to extend surface water supplies throughout the region. This project is currently in development and will be evaluated in a separate Environmental Impact Report under CEQA. As stated in the responses above, Daly City does not anticipate that adding Harding Park as a customer to the recycled water treatment plant would increase the likelihood that the Clubs would need to rely on groundwater as a back-up supply. Furthermore, the Draft Operating Agreement between SFPUC and Daly City requires that SFPUC provide SFPUC system water on a standby basis in the event that recycled water is not available for Harding Park irrigation. No change to the Clubs’ use of recycled water or need to access groundwater is anticipated as part of the proposed project. The effect of the conjunctive use program on the availability of groundwater that the Clubs have reserved their right to pursuant to the Agreement is beyond the scope of this project.

F-11 Daly City acknowledges that the commenter is referring to the Lake Merced Restoration Project Plan, described briefly on page 5-7. Please refer to the response in F-10.

F-12 Comment noted
September 10, 2009

Mr. Patrick Sweetland  
City of Daly City  
153 Lake Merced Blvd.  
Daly City, CA 94105

Dear Mr. Sweetland:

Harding Park Recycled Water Project – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Harding Park Recycled Water Project. The following comments are based on the Draft Environmental Impact Report (DEIR).

Encroachment Permit

Please be advised that any work or traffic control within the State Right-of-Way (ROW) requires an encroachment permit that is issued by the Department. Traffic-related mitigation measures will be incorporated into the construction plans during the encroachment permit process. See the following website link for more information:

http://www.dot.ca.gov/hq/traffops/developserv/permits/

To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans which clearly indicate State ROW to the address at the top of this letterhead, marked ATTN: Michael Condie, Mail Stop #5E.

Should you have any questions regarding this letter, please call Yatman Kwan of my staff at (510) 622-1670.

Sincerely,

Lisa Carboni  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"
Dear Mr. Sweetland:

We have reviewed the Draft Environmental Impact Report (DEIR) for the Harding Park Recycled Water Project (Project). The Project would provide recycled water from the North San Mateo County Sanitation District’s recycled water facility to the 18-hole Harding Park Golf Course and 9-hole Fleming Golf Courses (referred to jointly herein as Harding Park). The proposed Project consists of construction and operation of a 0.8 mile recycled water pipeline, underground storage tank, and pump station to convey recycled water from the existing recycled water facility in Daly City to the Harding Park irrigation system in San Francisco. Based on the information provided in the DEIR, we offer the following comments.

**Comment 1: Discharges to the San Francisco Combined Sewer**

The text on pages S-7, 2-22, and elsewhere indicates that there will be discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard to the San Francisco combined sewers. Please note that the City and County of San Francisco has a small separate stormwater sewer system around Lake Merced that includes at least one storm drain along Lake Merced Boulevard. Requirements for discharging to this small separate sewer system will differ from requirements for discharging to the combined sewer system. As a result, the City of Daly City should verify that discharges will be to the San Francisco combined sewer system and not to the separate sewer system before discharging to storm drains or catch basins.
Closing

Please contact Xavier Fernandez at 510-622-5685 or xafernandez@waterboards.ca.gov with any questions or comments.

Sincerely,

William B. Hurley, P.E.
Senior Engineer

cc: State Clearinghouse
   SWRCB, DWQ. Stateboard401@waterboards.ca.gov
   CDFG, Wesley Stokes, wstokes@dfg.ca.gov
Manisha,

I reviewed the Draft EIR, focusing on Chapter 5. The characterization of the utilities work for the new SF State Creative Arts Center is accurate. We’re confident that through coordination we can minimize traffic impacts during construction of our respective projects.

I noticed a couple of typos that I’ll pass along. In chapter 5, in the table, for SF State under “Estimate Construction Schedule,” delete “to.” On page 5-13, under “Mitigation Measures” change “struck” to “truck.” Also, no big deal, but we prefer “SF State” to “SFSU.”

Thanks very much for the opportunity to comment.

Best,

Wendy Bloom
Campus Planner
San Francisco State University
415.338.3838
SEP 9 2009

Mr. Patrick Sweetland  
City of Daly City  
Department of Water and Wastewater Resources  
153 Lake Merced Blvd  
Daly City, CA 94015

Dear Mr. Sweetland:

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR CITY OF DALY CITY, DEPARTMENT OF WATER AND WASTEWATER RESOURCES (CITY); HARDING PARK RECYCLED WATER PROJECT (PROJECT); SAN MATEO COUNTY; STATE CLEARINGHOUSE (SCH NO. 2009012004)

The State Water Resources Control Board (State Water Board) appreciates the opportunity to provide comments on the draft EIR prepared for the proposed Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Board is providing the following information for the environmental document prepared for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the Clean Water State Revolving Fund (CWSRF) Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act, and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, to recycle water, correct nonpoint source and storm drainage pollution problems, and provide for estuary enhancement, thus protecting and promoting the health, safety and welfare of state inhabitants. The CWSRF Program provides low-interest funding equal to one-half the most recent State General Obligation Bond Rates with a 20-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at: www.waterboards.ca.gov/waterissues/programs/grantsloans/srf/index.shtml.

The CWSRF Program is partially funded by the U.S. Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Four enclosures are included that further explain the environmental review process and additional federal requirements in the CWSRF Program. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives must be resolved prior to State Water Board approval of a CWSRF funding commitment. Three information sheets are included that further explain the environmental review process and additional federal requirements in the CWSRF Program. In addition, an environmental form is included for the City to submit should it pursue State Water Board funding.
A proactive approach to the permitting process at state and federal levels is recommended by the State Water Board. Please include in the EIR any recent Biological Survey reports conducted during the appropriate season for special status species to address Endangered Species Act requirements. At the State level, a California Department of Fish and Game (DFG) 2080 permit requirement will apply if special status species are potentially affected by Project construction or operation. In addition at the Federal level, consultation under Section 7 or 10 of the federal ESA formal Consultation with the U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service should be initiated proactively by the City if potential adverse impacts to special status species are expected.

Thank you once again for the opportunity to review the City's draft EIR. If you have any questions regarding my comments, please feel free to contact me at (916) 341-5686, or by email at jhockenberry@waterboards.ca.gov.

Sincerely,

[Signature]

James Hockenberry
Environmental Scientist

Enclosures (4)

cc: State Clearinghouse w/o enclosures
(Re: SCH# 2009012004)
P. O. Box 3044
Sacramento, CA  95812-3044
Patrick Sweetland  
Director, Water and Wastewater Resources  
City of Daly City  
153 Lake Merced Blvd.  
Daly City, CA 94105

Subject: SCH No. 2009-012004 – Draft Environmental Impact Report for the Harding Park Recycled Water Project

Dear Mr. Sweetland,

Thank you for the opportunity to provide the following comments from the Bay Area Water Supply & Conservation Agency (BAWSCA). BAWSCA represents the interests of 25 cities and water districts, an investor-owned utility, and a university, that purchase water wholesale from the San Francisco Regional Water System. These agencies, in turn, provide water to 1.7 million people, businesses and community organizations in Alameda, Santa Clara and San Mateo counties. These comments are in response to the Draft Environmental Impact Report (EIR) published July 27, 2009 for the Harding Park Recycled Water Project.

The comments below follow the report organization and do not reflect the level or priority.

1. **Section 1.2 Project Background**
   - The text erroneously equates San Francisco bond measure Proposition A to AB 1823. Assembly Bill 1823 is known as the Wholesale Regional Water System Security and Reliability Act and defines a process to ensure that the San Francisco Bay Area regional water system is rebuilt to help protect the health, safety and economic well being of the system customers. It does not authorize bond sales. Please correct this citation.

2. **Chapter 3. Environmental Setting and Impacts**
   - The SFPUC has established Standard Construction Measures for all projects that would be implemented as part of the WSIP. The main objective of these measures is to reduce impacts on existing resources to the extent feasible. The SFPUC project manager, environmental project manager, and contract manager would ensure that the project contains uniform provisions to address these issues. The ten measures cover the topics of neighborhood notice, seismic and geotechnical studies, on-site air and water quality measures during construction, groundwater, traffic, noise, hazardous materials, biological resources, cultural resources, and project site. The SFPUC Standard Construction Measures that are applicable to impacts identified in this EIR should be noted.

3. **Chapter 3. Environmental Setting and Impacts**
   - The SFPUC has established greenhouse gas reduction actions for all projects that would be implemented as part of the WSIP. The main objective of these measures is to reduce...
emissions of greenhouse gases. The SFPUC project manager, environmental project manager, and contract manager would ensure that the project contains uniform provisions to address these issues. The three measures cover the topics of energy-efficient design, construction worker education, and construction vehicle tire inflation. The SFPUC greenhouse gas reduction actions that are applicable to impacts identified in this EIR should be noted.

4. Section 3.1 Overview

- On page 3.1-1 the DEIR correctly states that "the SFPUC plans to meet or offset 10 mgd of its retail demand in San Francisco through a combination of conservation, recycled water, and groundwater projects including the proposed Project." However, the reference to the WSIP goal of 58 million gallons per day (mgd) of conservation savings and water recycling by 2030 pertains to the commitment BAWSCA and its member agencies have made to conservation savings and reclamation by 2030 as follows:

  a. 25 mgd conservation savings that would naturally result from implementation of the existing plumbing codes;
  
  b. 23 mgd of conservation and recycled water that BAWSCA member agencies have committed to as part of the planning process with SFPUC and which each individual agency is planning to implement;
  
  c. An additional 10 mgd of conservation savings within the BAWSCA area that was committed to by BAWSCA as part of its comments on the San Francisco Public Utilities Commission (SFPUC) Draft Program Environmental Impact Report (PEIR) for their Water System Improvement Program (WSIP).

Please clarify that the Project is being developed to meet the SFPUC commitment to reduce San Francisco retail customer use of surface water to 81 mgd by 2018 as required by the WSIP and adopted by the SFPUC on October 30, 2008.

Thank you for the opportunity to provide these comments on the Draft EIR for the Harding Park Recycled Water Project dated July 27, 2009. If you have any questions, please contact me at (650) 349-3000.

Sincerely,

Nicole M. Sandkulla, P.E.
Senior Water Resources Engineer

cc: A. Jensen, BAWSCA
    R. McDevitt, Hanson Bridgett
    D. Newkirk, Newkirk Environmental
    T. Roberts, Terry Roberts Consulting
    File
Comment Letter F

BOLD, POLISNER, MADDOW, NELSON & JUDSON
A PROFESSIONAL CORPORATION
500 YGNACIO VALLEY ROAD, SUITE 325
WALNUT CREEK, CALIFORNIA 94596-3840
TELEPHONE (925) 933-7777
TELEFAX (925) 933-7804

September 10, 2009

VIA OVERNIGHT DELIVERY

Patrick Sweetland, Director
Department of Water and Wastewater Resources
City of Daly City
153 Lake Merced Blvd.
Daly City, CA 94105

Re: Harding Park Recycled Water Project Draft EIR

Dear Mr. Sweetland:

This office serves as special counsel to Lake Merced Golf Club, San Francisco Golf Club, and The Olympic Club (collectively referred to in this letter as “the Clubs”) concerning certain water matters. In that capacity, we have reviewed the Draft Environmental Impact Report ("DEIR") for the proposed Harding Park Recycled Water Project ("Project"), and offer the comments set forth below.

Each of the Clubs understand and agree with the principle of using recycled water for irrigation purposes rather than using potable water that is imported or pumped where recycled water use is technically and economically feasible. The Clubs have elected to "put their money where their mouths are" on this issue – as you know, each of the Clubs uses recycled water produced at Daly City's tertiary treatment plant as the principal source of golf course irrigation water. Each of the Clubs is signatory to an agreement with Daly City and the San Francisco Public Utilities Commission ("SFPUC") for the sale, purchase, and delivery of recycled water to be used for this purpose. Each of the Clubs agreed to use recycled water in lieu of continuing to pump groundwater from the southern portion of the Westside Basin groundwater aquifer.

Each of the Clubs continues to abide by that recycled water agreement, and each continues to pay considerably more for recycled water delivered under the agreement than they would be paying to use their existing facilities for production of groundwater to irrigate their property. Each of the Clubs entered into that agreement based on contractual commitments made by Daly City (and the SFPUC) concerning assured quality and quantity of recycled water to be delivered to the Clubs. The principal factor which induced each of the Clubs to enter into that agreement was the contractual commitment made by Daly City that the Clubs would have a permanent and irrevocable priority for recycled water to be produced by Daly City.
The DEIR contains a 34-page Project Description that is silent on the restriction or limitation created for the proposed Project by the mere existence of the agreement under which Daly City made its long-term commitment to a priority for recycled water to be provided to the Clubs. Without complete disclosure of that important limitation on Daly City's discretion, the DEIR gives an incomplete picture of the circumstances under which the proposed Project would be undertaken.

Failure to adequately disclose the commitment to the Clubs results in the DEIR giving an incomplete explanation of the reason for the large storage tank to be constructed at the parking lot at Harding Park or for the new facilities that would be needed to allow Daly City to continue to meet the Clubs' irrigation needs without interruption. The DEIR is also inadequate in that it fails to indicate that the proposed Project has the potential to place added wear-and-tear on the facilities needed to serve the Clubs under the existing recycled water agreement. This is a particularly important concern to The Olympic Club because the facilities to serve Harding Park are those which are now dedicated solely to serving Olympic. The DEIR also fails to discuss protections that are needed by the Clubs with regard to operational criteria and command/control facilities that will ensure that the Clubs' priority for recycled water will be honored and protected in all cases.

The Clubs respectfully suggest that the issues discussed above might best be dealt with in a new agreement between Daly City, the SFPUC, and the Clubs dealing solely with the proposed Project. The need for such an agreement (or perhaps an amendment or addendum to the existing agreement) should be acknowledged in Chapter 2.6 of the DEIR, as a required approval for the proposed Project.

The Clubs have been monitoring some of the many components of the SFPUC Water Supply Improvement Program, which includes the proposed Project. The Clubs have long advocated that water resources activities in the region, and particularly in the area around Lake Merced and the Westside Basin, should be dealt with on a comprehensive and integrated resource management basis. It is the Clubs' belief that integrated water resources management should include all types of water resources, including imported water, groundwater, recycled water, and stormwater.

We note with interest the analysis of "cumulative impacts" found in Chapter 5 of the DEIR, but are somewhat disappointed at what we perceive as a narrowly constrained discussion. For example, there is brief mention of a feasibility study aimed at expanding Daly City's tertiary water facilities, but with no disclosure of the relationship of that proposal to the proposed Project. Possible new Daly City stormwater facilities are identified as part of the cumulative
impacts discussion, but are not listed as possible alternative to the proposed Project. To the extent that stormwater management and disposal is an ongoing subject of analysis by Daly City (and perhaps the SFPUC), the Clubs respectfully suggest that consideration should be given to the possibility that stormwater capture and storage might be a cost-effective alternative to use of recycled water for Harding Park irrigation. Such an alternative might be a means to protect the contractual commitments that Daly City made to the Clubs, and perhaps to serve recycled water to other potential users for which stormwater use would not be a reasonably feasible alternative.

The Clubs also noted the reference to a number of projects or proposed projects which would dramatically increase use of groundwater from the Westside Basin. The Clubs have the right to use groundwater for up to 30% of their irrigation water needs, and to rely entirely on groundwater in the event of a facilities outage or other event that interrupts Daly City's deliveries of recycled water, or if Daly City fails to meet the water quality requirements to which they are contractually obligated. In discussing the cumulative impacts of the proposed Project and related past, present, and probable future projects, the Clubs believe that one issue which needs to be explored is the possibility that adding Harding Park to the demand on Daly City's facilities will mean the Clubs will have a greater likelihood of needing to rely on groundwater, and will raise the question of whether those resources will be adequate to meet the Clubs' needs.

For example, the Clubs understand that the SFPUC and Daly City are interested in an expansion of the "conjointive use" project that was partially pilot-tested in recent years. The Clubs also understand that the larger permanent project now in evaluation could result in the installation of large new production wells near areas from which the Clubs pump; they also understand that the proposed new conjointive use project would involve more than doubling the extraction of groundwater from Westside Basin areas south of Lake Merced. The Clubs' questions are simple: Will there be adequate groundwater available to the Clubs when they want or need to use it? Will operation of the new facilities interfere with the Clubs' wells? Will the Clubs need to deepen or replace their wells, or make changes to their pumps as a result of the construction and implementation of the conjointive use program? The Clubs fully understand that many of these issues will have to be discussed in the planning and environmental documentation for the conjointive use program, but the Clubs are concerned that without an understanding of the impacts of conjointive use, it is not possible to fully analyze the potential impacts to the Clubs of Daly City adding another large customer's demands to the tertiary plant and transmission facilities.

In addition to the conjointive use project, the Clubs are aware of the SFPUC's proposed projects to pump additional groundwater to stabilize the water surface elevation of Lake Merced, and for injection into the water transmission and distribution system within San Francisco. The
comments made in the previous paragraph regarding cumulative impacts analysis related to the proposed conjunctive use project are generally applicable as well to the projects mentioned in this paragraph.

On behalf of each of the Clubs, I wish to express appreciation for the opportunity to offer comments on the DEIR. The Clubs reserve the right to offer additional comments prior to the approval of the proposed Project by Daly City (i.e., by the City Council of Daly City, sitting as the Board of Directors of the North San Mateo County Sanitation District) and by the SFPUC. If you, your staff or Daly City’s consultants have any questions about any aspect of this letter, please contact me at the phone number listed above.

Very truly yours,

Robert B. Maddow

RBM:jhj

cc via email:
Rose Zimmerman, City Attorney, City of Daly City
Manisha Kothari, SFPUC Project Manager
Joshua D. Milstein, Deputy City Attorney, San Francisco
The Clubs
CHAPTER 3
Text Revisions

3.1 Introduction

The following revisions have been made to the Draft EIR text. These corrections include: minor corrections made by the EIR authors to improve writing clarity, grammar, and consistency; corrections, additions, or clarifications requested by a specific comment; or staff-initiated text changes to update information presented in the Draft EIR. The text revisions are organized by the chapter and page number that appear in the Draft EIR. Strikethrough text presented in this section indicates text that has been deleted from the Draft EIR. Text that has been added to the Draft EIR is presented as underlined.

3.2 Text Revisions

Chapter 1. Introduction

Page 1-1, Section 1.2 has been modified as follows:

The proposed Harding Park Recycled Water Project (“Project”) is one of the projects funded through the WSIP bond measure Proposition A (Assembly Bill No. 1823).

Chapter 2. Project Description

Chapter 2, Project Description, page 2-33:

- The SFPUC is committed to the following GHG reduction actions as part of the WSIP program. As part of project approval the SFPUC will include the following Greenhouse Gas reduction actions in the contract specifications:

  - The SFPUC will require that all contractors maintain tire inflation to the manufacturers’ inflation specifications.

  - The SFPUC will implement a construction worker education program for all WSIP projects.

Chapter 3. Environmental Setting and Impacts

3.1 Overview

Page 3.1-1, the following section has been revised:
The proposed Project is a component of the SFPUC Water System Improvement Project (WSIP). As such, implementation of the proposed Project would contribute to meeting overall WSIP goals and objectives to reduce San Francisco retail purchases from the regional water system watersheds to 81 mgd by 2018, particularly that of 58 mgd of conservation savings and water recycling by year 2030. In order to meet this goal, the SFPUC plans to meet or offset 10 mgd of its retail demand in San Francisco through a combination of conservation, recycled water, and groundwater projects including the proposed Project.

3.3 Aesthetics

Page 3.3-11, the following text has been revised as a staff-initiated text change:

Mitigation Measures

Measure 3.3-3a: The contractor will ensure that lighting used during any nighttime construction is directed downward and oriented such that no light source is directly visible from neighboring residential areas.

Measure 3.3-3b: The project designs contractor will:

- Require full cutoff, low intensity light fixtures, with no light cast beyond the edge of the Project site as demonstrated by a photometric study of the proposed fixtures.

- Prevent use of highly reflective building materials and/or finishes in the designs for proposed structures, including fencing and light poles. In accordance with Measure 3.3-1b, above, landscaping will be provided around proposed facilities. This vegetation will be selected, placed, and maintained to minimize offsite light and glare in surrounding areas.

3.12 Hydrology and Water Quality

Page 3.12-15, the following text has been revised as a staff-initiated text change:

Mitigation Measures

Measure 3.12-1a: For construction activities that would occur within Daly City, Daly City the contractor will file a Notice of Intent (NOI) to the SWRCB, develop a Storm Water Pollution Prevention Plan (SWPPP), and file a Notice of Termination (NOT) at the end of construction. The SWPPP will be maintained at the construction site for the entire duration of construction.

Page 3.12-15, the following bullet has been added to Mitigation Measure 3.12-1a:

- Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.

Page 3.12-16, the following bullet has been added to Mitigation Measure 3.12-1b:
• Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.

Chapter 5. Other Topics Required by CEQA

Table 5-1 on page 5-8 is revised as follows (new language is underlined; deleted language is indicated by strikethrough text):

Utility work on the Creative Arts Building anticipated for August 2010 through January 2011.

On page 5-13 the following text has been revised:

The coordinated plan will include measures that address overlapping construction schedules and activities, truck arrivals and departures, land closures and detours, and the adequacy of on-street staging requirements.

Table 5-1 on page 5-8 the following text has been revised:

SF State SU
CHAPTER 4
Mitigation Monitoring and Reporting Plan for the Harding Park Recycled Water Project
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<tr>
<th>Impact No.</th>
<th>Impact Summary</th>
<th>Mitigation No.</th>
<th>Mitigation Measure (Exact Text)</th>
<th>Responsible Party</th>
<th>Reviewing &amp; Approval Party</th>
<th>Monitoring and Reporting Actions</th>
<th>Implementation Schedule</th>
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<tr>
<td>3.3-1</td>
<td>Short-term visual impacts during construction.</td>
<td>3.3-1a</td>
<td>For stationary (non-pipeline) project sites expected to be under construction or in use as a staging area for a period of one year or more, the contractor will ensure that construction-related activity is as clean and inconspicuous as practical by storing building materials and equipment within the proposed construction staging areas or in areas that are generally away from public view and by removing construction debris promptly at regular intervals. An 8-foot high green screening fence will be installed around the perimeter of the Vista Grande Canal staging area. Mitigation Measure 3.6-1 (see Section 3.6, Noise and Vibration) will require that a noise barrier be installed at the pump station and storage tank site. That measure would mitigate temporary visual impacts at the pump station and storage tank site, negating the need for Measure 3.3-1a at that location (as well as the need to preserve the hedge).</td>
<td>Contractor</td>
<td>Report to: SFPUC</td>
<td>1) Incorporate appropriate language in contract documents 2) Install visual screening fence 3) Document compliance with visual screening in inspection logs and require corrective action if non-compliant</td>
<td>1) Design 2) Pre-Construction</td>
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<td>3.3-1b</td>
<td>Minimize tree removal: The contractor will minimize or avoid the removal of existing trees that would screen the proposed pump station. The contractor will consult with a qualified arborist regarding the minimum buffer zones required to prevent root damage to remaining trees and to provide SFPUC with any necessary maintenance requirements for remaining trees.</td>
<td>Contractor</td>
<td>Report to: SFPUC</td>
<td>1) Qualified arborist 2) SFPUC</td>
<td>1) Incorporate appropriate language in contract documents 2) Consultation with qualified arborist 3) Maintain buffer zones and protect trees</td>
<td>1) Design 2) Pre-Construction 3) Construction Implementation</td>
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<tr>
<td>3.3-3</td>
<td>New sources of light or glare.</td>
<td>3.3-3a</td>
<td>The contractor will ensure that lighting used during any nighttime construction is directed downward and oriented such that no light source is directly visible from neighboring residential areas.</td>
<td>Contractor</td>
<td>Report to: SFPUC</td>
<td>1) Incorporate appropriate language in contract documents 2) Document compliance with nighttime lighting requirements in inspection logs and require corrective action if non-compliant</td>
<td>1) Design 2) Construction Implementation</td>
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<td>3.3-3b</td>
<td>The project designs contractor will: • Require full cutoff, low intensity light fixtures, with no light cast beyond the edge of the Project site as demonstrated by a photometric study of the proposed fixtures. • Prevent use of highly reflective building materials and/or finishes in the designs for proposed structures, including fencing and light poles. In accordance with Measures 3.3-1b, above, landscaping will be provided around proposed facilities. This vegetation will be selected, placed, and maintained to minimize offsite light and glare in surrounding areas.</td>
<td>Project Engineer</td>
<td>Report to: SFPUC</td>
<td>1) Project Engineer</td>
<td>1) Incorporate appropriate language into designs 2) Document compliance with lighting and glare</td>
<td>1) Design 2) Monitoring</td>
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CULTURAL RESOURCES

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<td>3.4-1</td>
<td>Accidental Discovery Measures. 5 To avoid any</td>
<td>Accidental Discovery Measures 5</td>
<td>To avoid any</td>
<td>1) Incorporate appropriate language in contract documents</td>
<td>1) Design 2) Monitoring</td>
<td>1) Incorporate appropriate language in contract documents 2) Document compliance with nighttime lighting requirements in inspection logs and require corrective action if non-compliant</td>
<td>1) Design</td>
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## MITIGATION MONITORING AND REPORTING PROGRAM

### PROJECT NAME AND CASE NO. Harding Park Recycled Water Project EIR, No. 2009-012004

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<tr>
<td>1</td>
<td>resources and human remains</td>
<td>1) Contractor</td>
<td>potential adverse effect from the proposed project on accidentally discovered buried cultural resources as defined in CEQA Guidelines Section 15064.5(a)(c), the SFPUC will distribute the Planning Department's archaeological resource “ALERT” sheet to the project prime contractor, to any project subcontractor firms (including demolition, excavation, grading, foundation, pile driving, etc.) and to utilities firm involved in soil-disturbing activities within the project site. Prior to any soil-disturbing activities being undertaken, each contractor is responsible for ensuring that the “ALERT” sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The SFPUC will provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) confirming that all field personnel have received copies of the “ALERT” sheet. If the ERO determines that an archaeological resource may be present within the proposed Project site, the SFPUC will retain the services of a qualified archaeological consultant. The archaeological consultant will advise the ERO as to whether the discovery is an archaeological resource that retains sufficient integrity and is of potential scientific/historical/cultural significance. If an archaeological resource is present, the archaeological consultant will identify and evaluate the archaeological resource. The archaeological consultant will make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the SFPUC. Measures might include: preservation in situ of the archaeological resource; an archaeological monitoring program; or an archaeological evaluation program. If an archaeological monitoring program or archaeological testing program is required, it will be consistent with the MEA WSIP Archaeological Guidance (San Francisco Planning Department, 2008) for such programs. The ERO may also require that the SFPUC immediately implement a site security program if the archaeological resource is at risk from vandalism, looting, or other damaging actions. The proposed Project archaeological consultant will submit an accidental discovery Archaeological Data Recovery Report (ADR) to the ERO which, in addition to the usual contents of the ADR, includes an evaluation of the historical significance of any discovered archaeological resource, as well as describing the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken, and presenting, analyzing, and interpreting the recovered data. Information that may put</td>
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<td>1) Contractor</td>
<td>1) SFPUC and ERO</td>
<td>2) Pre-Construction and as necessary for new personnel during Construction</td>
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#### Human Remains and Associated or Unassociated Funerary Objects

1. Report to: 1) SFPUC and ERO 2) San Mateo or San Francisco County Coroner and NAHC. 1) Design 2) Construction Implementation.

2. From WSIP Mitigation Measure 4.7-2a: Human Remains and Associated or Unassociated Funerary Objects. 2) WSIP Mitigation Measure 4.7-1: Suspend Construction Work if Paleontological Resource is Identified.

3. From WSIP Mitigation Measure 4.7-2a: Human Remains and Associated or Unassociated Funerary Objects.

4. From WSIP Mitigation Measure 4.7-1: Suspend Construction Work if Paleontological Resource is Identified.

#### Inadvertent discovery of paleontological resources.

1. Report to: 1) SFPUC and ERO 2) Qualified Paleontologist. 1) Design 2) Construction Implementation.

2. From WSIP Mitigation Measure 4.7-1: Suspend Construction Work if Paleontological Resource is Identified.

3. From WSIP Mitigation Measure 4.7-2a: Human Remains and Associated or Unassociated Funerary Objects. 2) WSIP Mitigation Measure 4.7-1: Suspend Construction Work if Paleontological Resource is Identified.

4. From WSIP Mitigation Measure 4.7-1: Suspend Construction Work if Paleontological Resource is Identified.
## MITIGATION MONITORING AND REPORTING PROGRAM

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| 3.5-1      | Substantial increase in traffic in relation to existing traffic load and capacity of street system | 3.5-1 | Implement Traffic Control Plan. A Traffic Control Plan will be prepared in accordance with professional traffic engineering standards to show methods for maintaining traffic flows on roadways directly affected by Project construction, and will include, at a minimum, the following:  
- Circulation plans will be developed to minimize impacts on local street circulation. Flaggers and/or signage will be used to guide vehicles through and/or around the construction zone.  
- Truck routes will be identified in the traffic control plan. Hard routes that minimize truck traffic on local roadways and residential streets will be utilized to the extent possible.  
- Sufficient staging areas will be provided for trucks accessing construction zones to minimize disruption of access to adjacent land uses.  
- Access to driveways and private roads will be maintained by using steel french plates. If access must be restricted for brief periods, property owners will be notified in advance.  
- Lane closures will be limited during peak hours to the extent possible. Outside of allowed working hours or when work is not in progress, roads will be restored to normal operations, with all trenches covered with steel plates.  
- Pedestrian and bicycle access and circulation will be maintained during Project construction where safe to do so. If construction activities encroach on a bicycle lane, warning signs will be posted that indicate bicycles and vehicles are sharing the lane.  
- Detours will be included for bicycles and pedestrians where feasible for portions of Lake Merced Perimeter Trail where potentially affected by Project construction.  
- All equipment and materials will be stored in designated contractor staging areas on or adjacent to the worksite, in such a manner to minimize obstruction of traffic.  
- Roadside safety protocols will be implemented. Advance “Road Work Ahead” warning signs and speed control (including signs informing drivers of state-legislated double fines for speed infractions in a construction zone) will be provided to achieve required speed reductions for safe traffic flow through. | 1) Contractor 2) SFPUC | 1) SFPUC 2) San Mateo and San Francisco County, San Francisco, and Daly City | 1) Incorporate appropriate language in contract documents 2) Submit Traffic Plan along with documentation of agency approval to SFPUC 3) Verify that the Traffic Control Plan adequately addresses the required minimum elements 4) Incorporate traffic control measures and detour routes into construction documents 5) Document compliance with the Traffic Control Plan in inspection logs |

Implementation Schedule:  
- Design (D)  
- Pre-Construction (CP)  
- Construction Implementation (CI)  
- Monitoring (M)
# MITIGATION MONITORING AND REPORTING PROGRAM

## PROJECT NAME AND CASE NO. Harding Park Recycled Water Project EIR, No. 2009-012004

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### Impact Summary

- Construction will be coordinated with facility owners or administrators of sensitive land uses such as police and fire stations (including all fire protection agencies), transit stations, hospitals, and schools. Facility owners or operators will be notified in advance of the timing, location, and duration of construction activities and the locations of lane closures.
- Construction will be coordinated with local traffic agencies, SFMTA, and SamTrans, to minimize disruption and arrange for the temporary relocation of bus routes or bus stops in work zones as necessary.
- Roadway right-of-ways will be repaired or restored to their original conditions or better upon completion of construction.

### Monitoring and Reporting Program

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<tr>
<td>3.5-4</td>
<td>Impaired access to adjacent roadways and land uses.</td>
<td>See Measure 3.5-1</td>
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<td>3.5-5</td>
<td>Increased wear-and-tear on the designated haul routes.</td>
<td>3.5-5</td>
<td>Daly City and San Francisco will enter into an agreement prior to construction that will detail pre-construction conditions and the post-construction requirements of a roadway rehabilitation program. Roads damaged by construction would be repaired to a structural condition equal to that which existed prior to construction activity.</td>
<td>Responsibility: 1) Project Engineer 2) Contractor 3) SFPUC and Daly City</td>
<td>Report to: SFPUC 1) Project Engineer will prepare details for pre-construction conditions and post-construction requirements of a roadway rehabilitation program. 2) SFPUC and Daly City will enter into an agreement prior to construction regarding these conditions. 3) The contractor will incorporate these conditions into the contract. 4) Post-construction conditions will be documented.</td>
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### Noise and Vibration

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<td>3.6-1</td>
<td>Substantial temporary increase in noise level during construction.</td>
<td>3.6-1</td>
<td>The contractor will incorporate the following requirements into the contract specifications: Construction Hours Pipeline Construction In Daly City: Construction activities will be limited to between the weekday hours of 8:00 a.m. and 5:00 p.m. Pipeline construction will not take place on the weekend or after 5:00 p.m. In San Francisco: Construction will be limited to between the hours of 7:00 a.m. and 5:00 p.m. Pipeline construction will not take place on the weekend or during evenings. Pump Station/Storage Tank Construction In San Francisco: Construction will be limited to between the hours of 7:00 a.m. and 5:00 p.m., and may occasionally occur on weekends or evenings (up to 8:00 p.m.).</td>
<td>Responsibility: Contractor</td>
<td>Report to: SFPUC and Daly City 1) Incorporate noise ordinance requirements into contract specifications 2) Locate stationary noise sources as far away from sensitive receptors as feasible or provide noise controls to comply with local noise ordinance daytime and nighttime noise limits 3) Incorporate requirements for noise controls into construction documents 4) Locate material stockpiles and maintenance/ equipment staging and parking areas as far as feasible from residential receptors 5) Designate a project liaison to respond to noise complaints and develop a reporting program 6) Document implementation of noise control measures in inspection logs and require corrective action if contractor is non-compliant</td>
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**PROJECT NAME AND CASE NO.** Harding Park Recycled Water Project EIR, No. 2009-012004

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<td>3.6-2</td>
<td>Construction related vibration effects</td>
<td>3.6-2a</td>
<td>The contractor will prepare and submit a vibration control plan documenting that proposed construction equipment and methods would comply with the vibration specification of 0.5 inch PPV at any structure within 50 feet of the vibration source. Construction equipment and methods would also comply with more stringent standards specified by SFPUC or Daly City for existing utilities located close to locations where pile driving may occur, based on site-specific conditions such as age and composition of existing pipelines and tunnels. If these standards cannot be met, excavation and shoring must occur by other means and pile driving will not be used.</td>
<td>Contractor</td>
<td>SFPUC and Daly City</td>
<td>1) Contractor will prepare and submit a vibration control plan 2) SFPUC and Daly City will review and approve 3) SFPUC will monitor compliance</td>
<td>- Design (D) - Construction Implementation (CI)</td>
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<td>3.6-2b</td>
<td>Pile holes will be pre-drilled wherever feasible to reduce potential noise and vibration impacts. Where feasible, sonic or vibratory pile drivers will be used instead of impact pile drivers (sonic pile drivers are only effective in some soils).</td>
<td>Contractor</td>
<td>SFPUC and Daly City</td>
<td>1) Incorporate vibration requirements into contract specifications 2) SFPUC will monitor compliance</td>
<td>- Design (D) - Construction Implementation (CI)</td>
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<td>3.6-2c</td>
<td>The contractor will limit pile-driving activities to the following areas: Station 29+20, Station 30+25, Station 45+40, and Station 46+20. (All stations are +/- 20 feet.)</td>
<td>Contractor</td>
<td>SFPUC and Daly City</td>
<td>1) Incorporate vibration requirements into contract specifications 2) SFPUC will monitor compliance</td>
<td>- Design (D) - Construction Implementation (CI)</td>
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<td>3.6-2d</td>
<td>Pile driving activities shall be prohibited during the</td>
<td>Contractor</td>
<td>SFPUC and Daly City</td>
<td>1) Incorporate vibration requirements into contract specifications 2) SFPUC will monitor compliance</td>
<td>- Design (D) - Construction Implementation (CI)</td>
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**Monitoring and Reporting Program**

- Implementation: Equipment and trucks used for construction will use the industry standard noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds, wherever feasible).
- Implementation: At the pump station/storage tank site, the contractor will install temporary sound barriers between the construction site and the closest receptors to reduce noise levels to below the speech interference criterion at the closest receptor (the golf course fairway and the residences east of the site). The elevation of the barrier should be sufficient to interrupt the line-of-sight between the receptors and the tops of stacks (exhaust pipes) of construction equipment by about 5 to 10 feet. Sound-absorbing blankets can also be used at appropriate locations as necessary to protect nearby receptors. Any openings in sound barriers that are provided for truck/vehicle access will be located away from sensitive receptors (i.e., to the south). The contractor will retain an acoustical engineer to provide design specifications for the sound barrier along the golf course.

Stationary noise sources will be located as far from adjacent receptors, whenever feasible, and they will be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible.

- Impact Summary: Equipment and trucks used for construction will use the industry standard noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds, wherever feasible).
- Responsible Party: Contractor
- Reviewing & Approval Party: SFPUC and Daly City
- Monitoring and Reporting Actions: 1) Contractor will prepare and submit a vibration control plan 2) SFPUC and Daly City will review and approve 3) SFPUC will monitor compliance

- Implementation Schedule: - Design (D) - Pre-Construction (CP) - Construction Implementation (CI) - Monitoring (M)
## MITIGATION MONITORING AND REPORTING PROGRAM

**PROJECT NAME AND CASE NO.** Harding Park Recycled Water Project EIR, No. 2009-012004

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### AIR QUALITY

3.7-1 Construction would generate suspended and inhalable particulate matter.

**Mitigation Measure**

- 3.7-1 During construction, the construction contractor shall be required to implement the following measures required as part of BAAQMD basic dust control procedures required for construction sites. These include: Basic Controls that Apply to All Construction Sites:
  - a) Water all active construction areas at least twice daily. Watering should be sufficient to prevent airborne dust from leaving the site.
  - b) Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
  - c) Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
  - d) Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
  - e) Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

**Responsibility**

1) SFPUC
2) Contractor

**Report to:** SFPUC

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<td>specifications</td>
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<td>2) SFPUC will monitor compliance</td>
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### RECREATION

3.8-2 Disruption to existing recreational facilities.

**Mitigation Measure**

- 3.8-2 Daly City and San Francisco Recreation and Park Department will provide advance notification to all property owners, residents, and businesses adjacent to construction areas as well as recreation users likely to use trail segments affected by the proposed Project. Advance notification will include posting signage at affected trail segments, as well as written notification to any recreation organizations associated with Lake Merced or Harding Park. The notification will include the name and phone number of the individual to be contacted regarding questions or concerns about construction activity.

**Responsibility**

Daly City DWWR and San Francisco Recreation and Park Department

**Report to:** SFPUC

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<tr>
<td>1) Contractor to consult with SFPUC prior to trail, sidewalk and bike lane closures</td>
<td>2) Construction Implementation</td>
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<td>2) Provide advance notification to all property owners, residents, and businesses adjacent to construction areas as well as recreation users likely to use trail segments affected by the proposed Project.</td>
<td>2) Construction Implementation</td>
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<td>3) Advance notification will include posting signage at affected trail segments, as well as written notification to any recreation organizations associated with Lake Merced or Harding Park. The notification will include the name and phone number of the individual to be contacted regarding questions or concerns about construction activity.</td>
<td>2) Construction Implementation</td>
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## MITIGATION MONITORING AND REPORTING PROGRAM

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<td>3.9-3</td>
<td>Potential interference with existing utilities.</td>
<td>3.9-3a</td>
<td>Prior to excavation, the contractor will locate overhead and underground utility lines, such as natural gas, electricity, sewage, telephone, fuel, and water lines that may reasonably be expected to be encountered during excavation work.</td>
<td>Contractor</td>
<td>SFPUC</td>
<td>Incorporate appropriate language in contract documents</td>
<td>Design Pre-Construction</td>
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<td>3.9-3b</td>
<td>The contractor will find the exact location of underground utilities by safe and acceptable means, including the use of hand and modern techniques as well as customary types of equipment. Information regarding the size, color, and location of existing utilities must be confirmed before construction activities begin.</td>
<td>Contractor</td>
<td>SFPUC</td>
<td>Incorporate appropriate language in contract documents</td>
<td>Design Pre-Construction</td>
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<td>3.9-3c</td>
<td>The contractor will confirm the specific location of the high priority utility—the gas line—and highlight it on all constructions drawings. In the contract specifications, the contractor will be required to provide weekly updates on planned excavation for the upcoming week and identify when construction will occur near a high priority utility. On days when this work will occur, SFPUC construction managers will attend tailgate meetings with contractor staff to review all measures—those identified in the Mitigation Monitoring and Reporting Program and in the construction specifications—regarding such excavations.</td>
<td>Contractor and designated Health and Safety Officer</td>
<td>SFPUC</td>
<td>1. Incorporate appropriate language in contract documents 2. The contractor will provide weekly updates on planned excavation for the upcoming week and identify when construction will occur near a high priority utility. On days when this work will occur, SFPUC construction managers will attend tailgate meetings with contractor staff to review all measures—those identified in the Mitigation Monitoring and Reporting Program and in the construction specifications—regarding such excavations. 3. The contractor’s designated health and safety officer will specify a safe distance to work near the gas line and excavation closer to the pipeline will not be authorized until the designated health and safety officer confirms and documents in the construction records that: (1) the line was appropriately located in the field by the utility owner using as-built drawings and a pipeline-locating device, and (2) the location was verified by hand by the construction contractor. 4. The designated health and safety officer will provide written confirmation to SFPUC that the line has been adequately located, and excavation will not start until this confirmation has been received.</td>
<td>Design Pre-Construction</td>
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<td>3.9-3d</td>
<td>While any excavation is open, SFPUC or its contractors will protect, support, or remove underground utilities as necessary to safeguard employees.</td>
<td>Contractor</td>
<td>SFPUC</td>
<td>1. Incorporate appropriate language in contract documents 2. Implement measure during construction</td>
<td>1) Design 2) Construction Implementation</td>
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<td>3.9-3e</td>
<td>SFPUC or its contractors will notify local fire departments any time damage to a gas utility results in a leak or</td>
<td>Contractor</td>
<td>SFPUC</td>
<td>1. Incorporate appropriate language in contract documents</td>
<td>1) Design</td>
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### MITIGATION MONITORING AND REPORTING PROGRAM

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| 4.10-1     | Disturbance to special-status birds | 3.10-1 | The contractor will implement the following protection elements to avoid disturbing common and special-status nesting birds:  
  • Whenever feasible, vegetation will be removed during the non-breeding season (September 1 to January 31).  
  • For ground disturbing activities occurring during the breeding season (February 1 to August 31), a qualified wildlife biologist will conduct preconstruction surveys of all potential nesting habitat for birds within 500 feet of earthmoving activities.  
  • If active bird nests are found during preconstruction surveys, a 500-foot no-disturbance buffer will be created around active raptor nests during the breeding season or until it is determined that all young have fledged. A 250-foot buffer zone will be created around the nests of other special-status birds. These buffer zones are consistent with CDFG avoidance guidelines; however, they may be modified in coordination with CDFG based on existing conditions at work locations.  
  • If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs that have been determined to be unoccupied by nesting or other special-status birds may be pruned or removed. | Contractor | Report to: SFPUC | 1) Incorporate appropriate language in contract documents  
2) Qualified biologist or contractor | 1) Design  
2) Construction Implementation |
| 3.9-3f     | SFPUC or its contractors will contact utility owner if any damage occurs as a result of the proposed Project and promptly reconnect disconnected cables and lines with approval of owner. | 3.9-3f | SFPUC or its contractors will contact utility owner if any damage occurs as a result of the proposed Project and promptly reconnect disconnected cables and lines with approval of owner. | Contractor | Report to: SFPUC | 1) Incorporate appropriate language in contract documents  
2) Implement measure during construction | 1) Design  
2) Construction Implementation |
| 3.9-3g     | SFPUC or its engineers will coordinate final construction plans and specifications with affected utilities, such as PG&E. | 3.9-3g | SFPUC or its engineers will coordinate final construction plans and specifications with affected utilities, such as PG&E. | Project Engineers | Report to: SFPUC | Incorporate appropriate language in contract documents | Design |
| 3.9-3h     | SFPUC will notify residents and businesses in project area of potential utility service disruption two to four days in advance of construction. | 3.9-3h | SFPUC will notify residents and businesses in project area of potential utility service disruption two to four days in advance of construction. | SFPUC | Report to: SFPUC | 1) Contractor will notify SFPUC or potential utility disruption  
2) SFPUC will notify residents and businesses of potential utility disruption 2-4 days in advance of construction | Construction Implementation |

#### BIOLOGICAL RESOURCES

### 3.10-1 Disturbance to special-status birds

- The contractor will implement the following protection elements to avoid disturbing common and special-status nesting birds:  
  - Whenever feasible, vegetation will be removed during the non-breeding season (September 1 to January 31).  
  - For ground disturbing activities occurring during the breeding season (February 1 to August 31), a qualified wildlife biologist will conduct preconstruction surveys of all potential nesting habitat for birds within 500 feet of earthmoving activities.  
  - If active bird nests are found during preconstruction surveys, a 500-foot no-disturbance buffer will be created around active raptor nests during the breeding season or until it is determined that all young have fledged. A 250-foot buffer zone will be created around the nests of other special-status birds. These buffer zones are consistent with CDFG avoidance guidelines; however, they may be modified in coordination with CDFG based on existing conditions at work locations.  
  - If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs that have been determined to be unoccupied by nesting or other special-status birds may be pruned or removed.

### 3.10-3 Impacts to landmark or other significant trees

- The contractor will implement the following measures to avoid or reduce impacts on landmark or other significant trees, and street trees:  
  - Prior to the commencement of construction activities, trees necessary to remove or at risk of being damaged, will be identified. See Figure 2-4 in Chapter 3.
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<td>Monitoring (M)</td>
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<tr>
<td>2.0.1</td>
<td>Project Description for the identification of the trees to be removed.</td>
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<td>2.0.2</td>
<td>A Department of Public Works inspector or an arborist certified by the International Society of Arboriculture will inventory these trees, with the results of the inventory providing species, size (diameter at breast height), and number of protected trees. Also, in consultation with the Public Works inspector or Zoning Administrator, the arborist will determine if any are heritage or significant trees.</td>
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<td>2.0.3</td>
<td>If any protected trees are identified that will be potentially removed or damaged by construction of the proposed Project, design changes will be implemented, if feasible, to avoid the impact.</td>
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<td>2.0.4</td>
<td>Any protected trees that are removed will be replaced at a ratio of 1:1. Native trees will be replaced with one of the same genus and species; non-native trees will be replaced with a native tree. Fringe protectors (cages and tree shelters) to protect the planted trees from wildlife browse will be installed. The planted trees will be monitored regularly during a minimum two-year establishment period. Maintenance during the plant establishment period will include irrigation. After the establishment period, the native tree plantings are typically capable of survival and growth without supplemental irrigation.</td>
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<tr>
<td>2.0.5</td>
<td>Implement the proposed planting plan for the proposed Project.</td>
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<td>2.1.1</td>
<td>Slope instability during and after construction.</td>
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<tr>
<td>2.1.2</td>
<td>Erosion during construction.</td>
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<td>2.1.3</td>
<td>Seismically induced ground shaking.</td>
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<tr>
<td>2.1.4</td>
<td>Seismically induced ground failure, including liquefaction and settlement.</td>
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<td>2.2.1</td>
<td>Geology and Soils</td>
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<td>2.2.2</td>
<td>Slope instability during and after construction.</td>
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**Implementation Schedule**
- Design (D)
- Pre-Construction (CP)
- Construction Implementation (CI)
- Monitoring (M)
### MITIGATION MONITORING AND REPORTING PROGRAM

**PROJECT NAME AND CASE NO.** Harding Park Recycled Water Project EIR, No. 2009-012004

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<th>Implementation Schedule</th>
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<tbody>
<tr>
<td>3.11-5</td>
<td>Project located on expansive or corrosive soils.</td>
<td>3.11-5</td>
<td>The engineer will incorporate expansive soil and corrosion recommendations from Fugro West’s geotechnical report (2008) into Project design documents.</td>
<td><strong>Responsibility:</strong> Project Engineers</td>
<td>Report to: SFPUC</td>
<td>Incorporate appropriate language in contract documents</td>
</tr>
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#### HYDROLOGY AND WATER QUALITY

3.12-1 Degradation of water quality during construction.

3.12-1a For construction activities that would occur within Daly City, the contractor will file a Notice of Intent (NOI) to the SWRCB, develop a Storm Water Pollution Prevention Plan (SWPPP), and file a Notice of Termination (NOT) at the end of construction. The SWPPP will be maintained at the construction site for the entire duration of construction.

The objectives of the SWPPP are to identify pollutant sources that may affect the quality of stormwater discharge and to implement BMPs to reduce pollutants in stormwater discharges. At a minimum, the SWPPP would include the following:

- Site maps showing the construction site perimeter, existing and proposed structures, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and pre- and post-construction drainage patterns at the sites;
- Description of construction materials, practices, and designated areas for equipment storage and maintenance;
- List of contaminants with the potential to contact stormwater;
- Description of BMPs that minimize contact of contaminants with stormwater and minimize exposure of stormwater to construction materials, equipment, vehicles, and waste;
- Description of site-specific erosion and sedimentation control practices and BMPs to be implemented during construction (i.e., use of sandbag barriers or fiber bags around construction sites to break up slope length or flow), including the location where those BMPs will be placed;
- A schedule for inspecting and monitoring of BMPs; and
- Spill prevention and cleanup plan for rapid response to spills and/or emergencies.

- Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.

3.12-1b For construction activities within San Francisco, the contractor will:

- File a Notice of Intent (NOI) to the SWRCB;
- Develop a Storm Water Pollution Prevention Plan (SWPPP);
- File a Notice of Termination (NOT) at the end of construction;
- A schedule for inspecting and monitoring of BMPs;
- Spill prevention and cleanup plan for rapid response to spills and/or emergencies;
- Description of site-specific erosion and sedimentation control practices and BMPs to be implemented during construction (i.e., use of sandbag barriers or fiber bags around construction sites to break up slope length or flow), including the location where those BMPs will be placed;
- A schedule for inspecting and monitoring of BMPs; and
- Pre-Construction Construction Implementation
### Monitoring and Reporting Program

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<td>Responsible Party</td>
<td>Reviewing &amp; Approval Party</td>
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<td>Contractor</td>
<td>SFPUC</td>
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<td>Report to: SFPUC</td>
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#### Implementation Schedule
- Design (D)
- Pre-Construction (CP)
- Construction Implementation (CI)
- Monitoring (M)

### Implementation and Reporting

1. **Mitigation Measure 3.12-1b**
   - The SFPUC must review and approve the erosion control and sediment control plan prior to implementation, and conducts periodic inspections to ensure compliance with the plan.
2. **Mitigation Measure 3.12-1b**
   - The Contractor will implement the BMPs outlined under Mitigation Measure 3.12-1b.

#### Implementation Schedule

- **Design (D)**
- **Pre-Construction (CP)**
- **Construction Implementation (CI)**
- **Monitoring (M)**

### Monitoring and Reporting Actions

- **Construction Implementation**

### Responsibilities

- **Contractor**
- **SFPUC**
- **Engineer**

### HAZARDS AND HAZARDOUS MATERIALS

- **3.13-1** Hazardous materials in soil and groundwater
- **3.13-1** The engineer will incorporate the following requirements into the contract specifications:
  - Responsibility: Contractor and Project
  - Report to: SFPUC
  - Prepare and submit Site Health and Safety Plan

### Design

- **Pre-Construction**

### Hazard Reporting

- **Harding Park Recycled Water Project**
- **Response to Comments on DEIR**
- **October 2009**

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The contractor will implement the following BMPs required under the City’s pollution prevention program and Article 4.1 of San Francisco’s Public Works Code:

- Identify all storm drains and catch basins near the construction site and ensure all workers are aware of their locations to prevent pollutants from entering them.
- Protect all storm drain and catch basin inlets.
- Develop an erosion control and sediment control plan for wind and rain.
- Develop spill response and containment procedures.
- Inspect site regularly to ensure that BMPs are intact.
- Conduct daily site cleanings as needed.
- Educate employees and subcontractors about BMPs.
- Regularly maintain all BMPs at project site.
- Discharges of potable water and dewatered groundwater from trenches on Lake Merced Boulevard into the small separate stormwater sewer system on Lake Merced Boulevard will be prohibited.

The SFPUC must review and approve the erosion control and sediment control plan prior to implementation, and conducts periodic inspections to ensure compliance with the plan.

The SFPUC Wastewater Enterprise could require compliance with certain provisions in the permit such as treatment of the flows prior to discharge. The groundwater removed by dewatering would be discharged to the sanitary sewer system with authorization of and required permits from the applicable regulatory agencies, in this case SFPUC Wastewater Enterprise. The contractor will comply with applicable permit conditions associated with the treatment of groundwater within their jurisdiction prior to discharge. If necessary, a dewatering collection and disposal method will be identified at channel crossings.

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3.12-2 Flooding due to siltation from construction activities.

See Mitigation Measures 3.12-1a and 3.12-1b.

3.12-3 Discharge of contaminated water during construction.

See Mitigation Measure 3.12-3 above.

3.12-6 Discharge of contaminated water to surface water

See Mitigation Measure 3.12-3 above.
### MITIGATION MONITORING AND REPORTING PROGRAM

#### PROJECT NAME AND CASE NO. Harding Park Recycled Water Project EIR, No. 2009-012004

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#### ENERGY RESOURCES

**3.14-1 Use of large amounts of fuel, water, or energy during construction.**

- To limit exhaust emissions during the construction of the proposed Project the following exhaust controls, as set forth by the BAAQMD, will be implemented where applicable:
  - Grid power will be used instead of diesel generators at all construction sites where it is feasible to connect to grid power. While it may not be practical to connect to grid power for pipeline projects (since construction sites keep moving along the alignments), grid power shall be used for projects with fixed locations, such as tunnel entry and exit shafts/portals.
  - All proposed Project contracts specifications shall include Sections 2480 and 2485, Title 13, California Code of Regulations, which limit the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds, both California- or non-California-based trucks) to 30 seconds at a school or five minutes at any location. In addition, the use of diesel auxiliary power systems and main engines shall be limited to five minutes when within 100 feet of homes or schools while the driver is resting.
  - All proposed Project contracts specifications shall include Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure for Stationary Compression Ignition Engines, which specifies fuel and fuel additive requirements; emission standards for operation of any stationary, diesel-fueled, compression-ignition engines; and operation restrictions within 500 feet of school grounds when school is in session.
  - A schedule of low-emissions tune-ups shall be developed and such tune-ups shall be performed on all equipment, particularly for haul and delivery trucks.

**Responsibility:** Contractor

**Report to:** SFPUC

**Incorporate appropriate language in contract documents**

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**Pre-Construction**

**Construction Implementation**
### MITIGATION MONITORING AND REPORTING PROGRAM

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|            |               |                | log of required tune-ups shall be maintained and a copy of the log shall be submitted to the SFPUC on a monthly basis for review.  
• Low-sulfur fuels shall be used in all stationary and mobile equipment. | Contractor, SFPUC |  |  |
| 3.14-2     | Use of large amounts of fuel, water, or energy during operations | 3.14-2 | Consistent with the Energy Action Plan II priorities for reducing energy usage, the SFPUC will ensure that energy efficient equipment is used in all WSIP projects. A repair and maintenance plan will also be prepared for each facility to minimize power use. | Contractor, SFPUC | Report to: SFPUC | Incorporate appropriate language in contract documents SFPUC will prepare a repair and maintenance plan to minimize power use. |
| 5.4        | Cumulative traffic increases on local and regional roads. | 5.4-1 | In the event that more than one construction contract is issued for work along the proposed Project pipeline, and where construction could occur within and/or across multiple streets in the same vicinity, the SFPUC and construction contractor(s) will coordinate the traffic control plans in order to mitigate the impact of traffic disruption. The coordinated plan will include measures that address overlapping construction schedules and activities, struck arrivals and departures, land closures and detours, and the adequacy of on-street staging requirements. | Contractor, SFPUC | Report to: 1) SFPUC  2) SFPUC Construction Coordinator | 1) Incorporate appropriate language in contract documents 
2) Appoint qualified construction coordinator 
3) Review and coordinate project-specific traffic control plans 
4) Develop public information campaign to inform public of construction activities, detour routes, and alternate routes 
5) Work with local and regional agencies to pursue additional traffic mitigation measures for incorporation into project-specific traffic control plans |