## **ERRATA**

# SAUSALITO-MARIN CITY SANITARY DISTRICT TREATMENT PLANT UPGRADE PROJECT

# U.S. Department of the Interior, National Park Service Golden Gate National Recreation Area

#### **March 2015**

An Errata sheet is necessary to address substantive comments made on the Environmental Assessment (EA). Substantive comments are those that modify the existing alternatives, propose new alternatives not previously considered, supplement, improve or modify the impact analysis, or make factual corrections. The corrections in this Errata sheet do not change the project activities or increase the degree of impact described in the EA. Changes to the text and justification are provided below.

#### **CHANGES TO TEXT**

Changes to the text to reflect modifications made in response to public and agency comment. Existing text to remain is in *italics*, additions to the text are <u>underlined</u> and deleted text in shown in strikeout.

## Page 3-11, Section 3.2.3.4, Mitigation Measure BIO-1:

Mitigation Measure BIO-1. To avoid impacts on birds protected by the Migratory Bird Treaty Act, a pre-construction breeding season survey of the proposed project area and immediate vicinity would will be done by an NPS-approved biologist during the calendar year in which construction is planned to begin. If migratory nesting birds covered by the statute are identified on or adjacent to the proposed project area, construction would will be delayed, if necessary within 500 feet of active bird nests until any eggs have hatched and young have fledged. As a result, impacts on Migratory Bird Treaty Act-protected species would will not be significant.

## Page 3-11, Section 3.2.3.4, Mitigation Measure BIO-2:

Mitigation Measure BIO-2. Tree removal and trimming would will occur between August 1 and December 31 to avoid any impacts to nesting birds and minimize the potential for weeping wounds that are susceptible to disease, such as Sudden Oak Death (SOD). To avoid the potential spread of SOD, vegetation shall will be left on site or hauled to a permitted recycling center in Marin County. To further minimize the spread of SOD and noxious weeds, prior to arrival and departure from the project area, all vehicles, equipment, tools, and clothing shall will be cleaned of vegetation and mud.

## Page 3-13, Section 3.3.1.3, Regulatory Environment, Local

## San Francisco Bay Conservation and Development Commission

The BCDC has jurisdiction over the greater San Francisco Bay coastal resources, including the site of the Proposed Action. Jurisdiction of the California Coastal Commission does not apply to San Francisco Bay, where instead the BCDC regulates coastal development. Operation of the SMCSD Treatment Plant is under BCDC Permit No. 1980.024.00 (also known as BCDC Permit

No. 24-80), originally issued on April 20, 1981, and amended through October 22, 2012 (the eighth permit amendment) (BCDC 2012). As part of previous amendments, the BCDC found that although sewage treatment plants are not typically water-related uses consistent with McAteer-Petris Act and Bay Plan provisions and policies, the SMCSD facility is necessary to promote the safety and welfare of the Bay Area because the facility is a necessary component of the regional wastewater treatment program as adopted by the Regional Water Quality Control Board and for which there is no reasonable alternative.

## Page 3-18, Section 3.4.2, Affected Environment

Floods and Tsunamis. The lower portion of the project area is in a 100-year floodplain (Zone VE). Areas designated as Zone VE floodplains are subject to inundation by the 1-percent-annual-chance flood event (100-year flood) with additional hazards from storm-induced wave action. Mandatory flood insurance purchase requirements and floodplain management standards apply (FEMA 2013c). The NPS Water Resources Division (WRD) was consulted and determined that a Statement of Findings (SOF) for floodplain exposure was not required for the Proposed Action. Figure 9 shows the project area in relation to the FEMA 100-year floodplain.

## Page 3-18, Section 3.4.2, Affected Environment

Wild and Scenic Rivers. There are no Wild and Scenic Rivers at or in the vicinity of the project area.

## Page 3-33, Section 3.5.3.4, Mitigation Measure CUL-1:

**Mitigation Measure CUL-1.** The applicant would will implement these protocols for unanticipated archeological discoveries and uncovered human remains:

• Prior to construction, workers and supervisors would will be briefed on the potential for encountering buried archaeological resources and human remains that could be found in the project area and the response procedures to be followed if there is an unanticipated discovery;

## Page 3-39, Section 3.6.3.4, Mitigation Measure GEO-1:

Mitigation Measure GEO-1. To mitigate the loss or degradation of geologic materials associated with the Proposed Action, the removal of soil or rock, and importing of aggregate base rock will be performed in accordance with the Golden Gate National Recreation Area, Standard Operating Procedures for Managing Earth Materials. Earth materials generated within the park should will be reused in other parts of the GGNRA to mitigate the loss of geologic resources. Reuse of earth materials not tested for hazardous materials before removal may require testing before reuse. Earth materials from developed areas near roads, parking lots, and infrastructure will likely require testing for hazardous materials.

Any chert excavated during the Proposed Action that is appropriate for use as a trail, overlook, or parking area tread should will be used for tread rather than to backfill areas or for trail or road base. Good quality chert is considered valuable and should will be used as tread whenever possible. The reuse of chert as tread would will also mitigate the loss of radiolarian fossils commonly found in that rock.

## Page 3-44, Section 3.7.2, Affected Environment

The facility has a BAAQMD permit to operate. The emission sources included in the permit are a waste gas burner; two diesel-powered emergency generators; multiple boilers; primary, secondary, and tertiary treatment system components; chlorine tanks; the sludge handling process unit; and anaerobic digesters. The permit contains operating conditions for selected equipment to maintain compliance with applicable air quality regulations as authorized by the BAAQMD under federal and state mandates (BAAQMD 2012c).

## Page 3-48, Section 3.7.3.4, Mitigation Measure AIR-1:

Mitigation Measure AIR-1. The control measures from BAAQMD's 1999 CEQA Guidelines would will be implemented to reduce air quality impacts from construction. These measures would will be specified in the construction management plan and the construction site supervisor would will be responsible for ensuring, verifying, and documenting compliance.

## Page 3-49, Section 3.7.3.4, Mitigation Measure AIR-2:

Mitigation Measure AIR-2. The BAAQMD would may classify some of the new treatment system components as new sources of air emissions. These components could be subject to federal, state, and BAAQMD air permitting regulations, including New Source Review, Prevention of Significant Deterioration, National Emission Standards for Hazardous Air Pollutants, or New Source Performance Standards. The SMCSD would will perform an air quality regulatory analysis to determine what, if any, permitting is required for the operation of any new sources of air emissions and obtain the necessary permits prior to implementing the project.

## Page 3-59, Section 3.9., Other Resources

## 3.9.10 Agricultural Resources.

No agricultural uses exist at the site. The Proposed Action will not result in the conversion of farmland to a non-agricultural use, and the site is not subject to a Williamson Act contract.