

FINDING OF NO SIGNIFICANT IMPACT

SAUSALITO-MARIN CITY SANITARY DISTRICT TREATMENT PLANT UPGRADE PROJECT

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

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INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared for the proposed Sausalito-Marín City Sanitary District (SMCSD) Treatment Plant Upgrade Project (proposed action), per the requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and the National Park Service (NPS) guidelines in Director's Order 12 (2001). The project area is located south of the City of Sausalito in the Golden Gate National Recreation Area (GGNRA), within the eastern boundary of the Forts Baker, Barry, and Cronkhite Historic District.

The NPS and the SMCSD coordinated in preparation of a joint Environmental Assessment/Initial Study (EA/IS) per the requirements of NEPA and the California Environmental Quality Act (CEQA). The NPS is the lead agency under NEPA, and the SMCSD is the CEQA lead agency.

The EA/IS addressed the potential environmental impacts from both construction and operation of the proposed action. Each resource area was addressed with appropriate detail as determined by the level of activity proposed. The determinations of the level, if any, of environmental impact considered the affected environment and the resources that could be impacted by implementation of the proposed action. Per the NPS NEPA Handbook, the geographic area of the affected environment, also referred to as the Region of Influence (ROI), has been individually determined for each resource area to be analyzed. In all decisions concerning the boundary of the resource-specific affected environment, available input from local, state and federal agencies has been considered.

This FONSI approves federal actions on NPS property only. The SMCSD issued a separate Notice of Determination under its requirements for the CEQA analysis of the proposed action. This document describes the rationale used in selecting the alternative for implementation, and provides an explanation of why it will have no significant effects on the human environment. As stated in the EA/IS, the proposed project will upgrade the SMCSD wastewater treatment plant by installing primary, secondary, and tertiary improvements to address wet-weather flows, improving the quality of water discharging into San Francisco Bay. Additional site improvements would include converting an existing on-site residence for administrative office uses.

PURPOSE AND NEED

The purpose and need of the proposed action is to upgrade the SMCSD wastewater treatment plant by installing primary, secondary, and tertiary improvements to address wet-weather flows, improve the quality of water discharging into San Francisco Bay, and respond to state and federal regulatory compliance directives. Additional facility improvements would provide administrative office and meeting space for SMCSD personnel by conversion of an existing site residence, precluding the need for construction of new buildings or building additions.

This project is needed, in part, because the US Environmental Protection Agency (EPA) issued administrative orders in recent years directing the SMCSD to upgrade the facility in response to several discharges exceeding federal Clean Water Act Section 402 requirements. These discharges were caused by a lack of capacity during peak wet weather flows. During these events, effluent from the facility was discharged into the Bay without complete secondary treatment. The EPA directed the SMCSD to install primary system improvements to eliminate debris entering the primary clarifier. The improvements proposed at this time include the primary system improvements, as directed by the EPA, and other secondary and tertiary improvements. These improvements will address these concerns. Additionally, the proposed action will address current administrative space deficiencies by converting an existing on-site residence for administrative uses. This conversion will address compliance issues with the Americans with Disabilities Act (ADA) as well as providing needed office and meeting space.

SELECTED ALTERNATIVE

The SMCSD Treatment Plant Upgrade Project would implement facility and process improvements to the existing treatment operations, including the addition of a headworks, new primary clarifier, secondary upgrades, tertiary polishing, and equalization storage. The project has been developed to address regulatory compliance, plant operation, reliability, performance, and to prevent wet weather blending events for influent flows of up to 9.0 million gallons per day (MGD). The project includes the following components:

- Headworks Improvements
 - New screening and grit removal facilities
 - New material handling area with truck turntable
- Primary Treatment Improvements
 - New circular primary clarifier
- Secondary and Tertiary Improvements (located within the existing treatment area)
 - New Fixed Film Reactor (FFR) feed pumps with 9.0 MGD capacity
 - Replacement of existing FFR media
 - FFR odor control covers
 - Replacement and increased capacity of existing tertiary filtration process
- Equalization Storage
 - Minimum of 0.6 million gallons (MG)

- Administration Building Remodel
 - ADA access requirements
 - Remodel existing building to minimize construction cost and impacts
- Relocated Access Road
 - Relocate existing access road to accommodate headworks, primary and material handling facilities and to improve plant safety.

All of the proposed improvements would be within SMCSD’s existing easement, and 95 percent of the proposed improvements would be constructed within the existing 2.0 acre SMCSD facility footprint increasing the existing plant footprint by less than 0.1 acres in the area north of the existing access road. The northern edge of the treatment facility would be extended approximately 40 feet at its widest point

The public currently has access to the San Francisco Bay and SMCSD intends to maintain public access as part of the San Francisco Bay Conservation and Development Commission (BCDC) permit amendment for the project. The project will allow public access along the relocated road but will prevent public access to the treatment plant site.

Headworks (Screenings and Grit Removal)

Screening and grit removal is critical to the protection of wastewater treatment equipment as trash and inert particles in wastewater including sand and gravel, can cause unnecessary abrasion and wear on mechanical equipment, the build-up of deposits in pipelines, channels, and process structures. Screening and grit facilities will allow SMCSD to remove trash and grit at the beginning of the wastewater process to provide a more effective method for handling these materials.

Primary Treatment

The SMCSD treatment plant currently has one circular primary clarifier built in the 1950s. Since all flow to the treatment plant passes through it, the clarifier cannot be taken out of service for maintenance or repairs without adversely impacting plant performance. The flow rate through the primary clarifier during wet weather flow exceeds the peak design value. As a result, the clarifier’s solids removal capacity is greatly reduced at peak flow rates. An additional primary clarifier is needed to treat peak flows, and to provide the redundancy during dry weather to allow maintenance operations without impacting plant operations.

Secondary Treatment Upgrade

During peak wet weather events, the influent flow to the treatment plant can exceed the process capacity of the FFRs that is limited to the 6.8 MGD capacity of the FFR feed pump station. At flows greater than 6.8 MGD, primary effluent is passively routed around the FFRs and directed to the secondary clarifiers. This operational strategy of mixing primary effluent and secondary effluent is commonly referred to as “blending” and is currently allowed under the SMCSD National Pollutant Discharge Elimination System (NPDES) permit.

Blending requires additional sampling, data collection and record keeping, and the Regional Water Quality Control Board (RWQCB) has required the SMCSD to consider minimizing or eliminating blending. These alternatives include equalization, increasing secondary treatment capacity and adding

treatment specifically for blended flows. The RWQCB could eliminate the practice of blending from future SMCSD NPDES permits, which are renewed every 5 years.

Tertiary Treatment Upgrade

The SMCSD has existing continuously backwashing sand filters to remove additional suspended solids from the secondary effluent. They were added as a side stream process that can treat a maximum flow of 1.0 MGD. The sand filters are a necessary part of the treatment process because they reduce the total suspended solids (TSS) concentration in the secondary effluent from 45 milligrams per liter (mg/L) to below the SMCSD NPDES permit limit of 30 mg/L (monthly average). The SMCSD has worked to optimize the filters over the years and they are currently performing adequately as a polishing step during dry weather. The filters have been in service for approximately 30 years and are approaching the end of their useful life.

Because the sand filters only have a capacity of 1.0 MGD, they are ineffective at providing polishing treatment during peak wet weather events. Increasing the tertiary treatment capacity to 6.0 MGD would improve operational flexibility and improve treatment plant performance during wet weather.

Equalization

A minimum of 0.6 MG of equalization storage (along with the described FFR upgrades) would allow the SMCSD to limit flow to the secondary process to 9 MGD, which would allow the SMCSD to avoid blending up to and including the estimated five-year wet weather event. The equalization storage tank would be integrated into the new headworks structure and would have the capacity to store a minimum of 0.6 MG of primary influent or effluent. The final volume would be determined during final design based on the volume that can be readily made available in the new headworks structure.

Administrative Office Space

The project would remodel the existing district residence into approximately 1,750 square feet of administrative office use for SMCSD personnel. The additional room would alleviate the crowded office space that currently exists in the small structures in the maintenance yard. The project would provide staff with an ADA office and accessible parking that currently does not exist at the facility. The administrative office space modifications would also include minor access road improvements to facilitate better access to the new administration space and the existing facility storage/staging area. These improvements would be constructed with the proposed relocated access road improvements.

Relocated Access Road

Approximately 0.1-acres of land in the immediate north of the existing access road would be cleared of vegetation to make room for a relocated access road. Approximately 38 trees would be removed in this area, of which approximately 19 would be live oak trees ranging in size from 4 inches to 39 inches in diameter.

RANGE OF ALTERNATIVES

The Selected Alternative and No Action alternatives were analyzed. Under the No Action Alternative, the proposed headworks improvements, secondary and tertiary upgrades, and wet weather flow upgrades would not occur. The existing wastewater treatment facility would continue to operate in violation of

federal and state directives. The facility would continue to discharge partially treated wastewater into the San Francisco Bay during peak wet weather events, potentially compromising water quality in violation of the existing NPDES permit. The No Action Alternative would leave the site of administrative and staff meeting functions in their present location. The buildings would continue to experience ADA-compliance issues, and SMCSD would continue to need off-site spaces for meetings and various administrative functions.

Alternatives Dismissed from Further Study

NEPA Regulations Sec. 102(2)(E) requires an analysis of a range of alternatives that can be considered reasonable and feasible that meet most or all of the project objectives. Several sites at and near the existing SMCSD treatment plant have been considered that would meet all or most of the project objectives. Due to the physical requirements of the facility as a working utility, the constrained geographical setting, and the limitations in the terms of the existing easement with the NPS, the development of reasonable and feasible alternatives include only the following development scenarios at or near the current facility.

Bayside Alternative

The site of the existing solids dewatering building along the Bay was considered as a site for the proposed project. This site was considered due to proximity to the influent pipeline, existing access road, and primary clarifier. This site would allow for the primary treatment process to be elevated to maintain the necessary gravity flow to the existing diversion box. This alternative includes significant disadvantages that preclude it from further consideration. Among these is the location of the dewatering building that would require a stacked arrangement for the new headworks building that would place it directly above the new primary treatment process. This would entail the use of compact treatment technology that has not been sufficiently proven in wastewater applications leaving the facility with potentially high risk in meeting RWQCB discharge requirements. This would result in a cramped treatment and operating environment, increasing safety concerns and maintenance costs due to the constrained access. This limited space would preclude options for addressing the administrative space necessary for current SMCSD employees and related office and meeting functions.

The Bayside Alternative would be precluded for the operational reasons in the preceding paragraph. The Bayside Alternative would not provide the same level of operation, safety and process improvements as the Selected Alternative.

Hillside Alternative

This site is on a hillside along the existing facility access road. This alternative would have the advantage of not requiring the stacking of the proposed headworks facility. Construction would occur primarily outside the main facility, resulting in fewer disruptions to current operations than from the Bayside Alternative. The Hillside Alternative would not occupy areas currently used for administrative office and meeting activities as the Bayside Alternative would, further minimizing potential operational and construction impacts.

The Hillside Alternative was not considered reasonable or feasible for a number of reasons. First, it would split the treatment process across the existing access road, resulting in less-efficient operations. Second, it does not have the required space to accommodate the new primary treatment process, so it

would have to be at another site in the SMCSD easement that would not be guaranteed given the existing site topography and setting along the base of a steep hillside. The use of compact technologies would result in a potential risk of not meeting RWQCB discharge requirements, thereby not adequately addressing the purpose and need of the proposed action.

The Hillside Alternative cannot be considered reasonable or feasible because of environmental concerns. This location would require the construction of a new or extended access road that would require additional hillside excavation and grading, disrupting soils beyond what would be required for the Selected Alternative. This Alternative would require the removal of an estimated 80 trees. This was greater than the number of trees to be removed under the Selected Alternative.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS NEPA Guidelines and the CEQ NEPA regulations at 40 CFR Parts 1500-1508 identify the environmentally preferred alternative as the one resulting in the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The CEQ NEPA regulations also direct that the environmentally preferred alternative is the alternative that promotes the national environmental policy as expressed in Section 101(b) of NEPA, which includes the continuing responsibility of federal agencies to:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice;
- Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and,
- Enhance the quality of renewable resources and approach the maximum attainable recycling of unsustainable resources.

Upon consideration of these criteria, and careful analysis of the environmental impacts for each resource area, the NPS has identified the Selected Alternative as the Environmentally Preferred Alternative. Under the Selected Alternative, the SMCSD will instead a headworks process to remove trash and grit at the beginning of the wastewater treatment process to more effectively handle these materials. The Selected Alternative would add secondary and tertiary treatment upgrades to better handle waste water flows during wet weather events, greatly improving the quality of water discharging into San Francisco Bay and addressing major directives from the EPA. The upgrades would include polishers, filters, and related components that would address wastewater improvement concerns ensuring long-term positive environmental management of water resources and water quality in Fort Baker as well as the service area of the SMCSD. The Selected Alternative would include office and administrative upgrades to

ensure compliance with ADA regulations concerning access and function for persons with physical impairments and disabilities.

The Selected Alternative would enhance the quality of renewable resources and attain the widest range of beneficial uses to the environment as compared with the No Action Alternative. It would address long-needed federal and state regulatory requirements and improve the physical and human quality of the environment in which it is an integral component. It is for these reasons that the Selected Alternative is the Environmentally Preferred Alternative.

PUBLIC INVOLVEMENT

Public scoping for the Selected Alternative was conducted per the NPS NEPA handbook, and included scoping activities for both individuals and public agencies. This included the distribution of the public scoping notice. Hard copies of the notice were sent to approximately 50 local, state, and federal agencies, including the City of Sausalito. Electronic copies of the scoping notice were delivered to approximately 1,300 recipients on the NPS electronic mailing list for activities concerning the GGNRA, through its Planning, Environment, and Public Comment website. A public notice of scoping activities was published in the *Marin Independent-Journal* on December 18, 2012. The public scoping period began on December 18, 2012 and ended on January 31, 2013.

The SMCS D project was featured during two open house events held by the NPS at Fort Mason on March 19, 2013, and the Bay Model Visitor Center in Sausalito on July 16, 2013. Approximately 50 members of the public attended each event. The SMCS D exhibit included an informative project display highlighting features of the project and a timeline for project improvements. Questions from members of the public and inter-agency staff were fielded by SMCS D staff and the environmental consultant. The open house events were an added component to the public scoping process.

Public review of the EA/IS began on November 8, 2013 and concluded on December 13, 2013. The public and interested agencies were notified of the release of the EA/IS through various sources. An e-mail notification was sent to over 3,000 recipients on the NPS's GGNRA electronic mailing list through the NPS's Planning, Environment & Public Comment (PEPC) website. Hard copies of the notice were sent to approximately 50 individuals and agencies. A public notice was featured in the *Marin Independent Journal* on November 11, 2013.

RESPONSE TO COMMENTS

No public comments were received on the EA via the PEPC website. As part of the CEQA State Clearinghouse distribution, two Agency letters were received: Federal Emergency Management Agency (FEMA); and the California State Water Resources Control Board. FEMA requested SMCS D review the countywide Flood Insurance Rate Maps (FIRMs) to determine if construction is located within a Regulatory Floodway and requires no changes to the EA. The California State Water Resources Control Board asked Sausalito for additional documentation related to potential State funding sources that may be used for the project. This comment requires no changes to the EA.

An Errata sheet was prepared that makes changes to the EA. An errata 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.

AGENCY COORDINATION

State Historic Preservation Office

On April 17, 2013, the NPS, in accordance with Section 106 of the NHPA, initiated consultation with the SHPO regarding the Selected Alternative. The consultation letter stated that the environmental review for the project would include preparing a determination of eligibility for the SMCSO facility as a historical architectural property. The consultation also included that an archaeological survey would be conducted for the presence of archaeological resources in the project area. The analysis methods and findings of both the historical evaluation and the archaeological survey have been presented to the SHPO in subsequent consultation to request their concurrence.

Tribal Consultation

As part of the cultural resources evaluation of the Selected Alternative the NAHC in Sacramento was contacted to determine whether any portion of the present project area may encroach upon sites or associated cultural resources that may be deemed sacred by members of the local Native American community and determine any relevant Native American groups that should be contacted regarding this undertaking. The NAHC maintains map files of "Sacred Lands" and current tribal contact information.

In a return letter, the NAHC confirmed that there were no records of Native American traditional cultural resources near the project area and provided Native American points-of-contact for individuals and organization that may have additional knowledge of the culturally sensitive resources.

Representatives of the Ya-Ke-Ama and the Federated Indians of Graton Rancheria were contacted. The Ya-Ke-Ama had no comments on the Selected Alternative. The FIGR confirmed that they have received correspondence regarding the Selected Alternative, but have provided no comments. Separately, the FIGR were copied on the Sec. 106 initial consultation letter to the SHPO. The FIGR responded that they had no concerns, and asked to receive the results of the survey when it is completed. The NPS has responded with follow-up consultation detailing the survey results.

REGULATORY COMPLIANCE

The EA/IS has demonstrated that the Selected Alternative would be in compliance with all applicable federal regulations, provisions, and guidelines.

National Historic Preservation Act, Section 106

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires federal agencies to consider the effects of their undertakings on properties listed or potentially eligible for listing on the National Register of Historic Places (NRHP). All actions affecting the parks' cultural resources must comply with this legislation. It has been determined that the Selected Alternative would have no adverse effect on historic properties under Section 106 of the NHPA. The NPS cultural resources staff consulted with the State Historic Preservation Office (SHPO) under the GGNRA's 1992 Programmatic Agreement by the SHPO and Advisory Council on Historic Preservation (ACHP). SHPO concurred with NPS's finding of no adverse effect in a letter dated October 29, 2014.

Archaeological Resource Protection Act of 1979

The Archeological Resources Protection Act (ARPA) of 1979 as amended (PL 96-95; 93 Stat. 721; 16 USC 470aa et seq.) sets penalties for excavating, removing, damaging, altering, or defacing any archaeological resource more than 100 years old, on public or Indian lands, unless authorized by a permit. It applies to archaeological resources regardless of NRHP status. It prohibits the sale, purchase, exchange, transportation, receipt, or offering of any archaeological resource obtained in violation of any regulation or permit under the act or under any federal, state, or local law. The Act is implemented by uniform regulations and Department of Interior-specific regulations, found at 43 CFR Part 7. The NPS staff received an ARPA permit to conduct an archaeological excavation for a suspected cemetery site. The excavation and follow-up archival activities were conducted per the terms of this permit.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA), Pub. L. 101-601, 25 U.S.C. 3001 et seq., 104 Stat. 3048, requires federal agencies and institutions that receive federal funding to return Native American "cultural items" to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations. Cultural items include human remains, funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discoveries or excavations on private or state lands, the collection provisions of the Act may apply to Native American cultural items if they come under the control of an institution that receives federal funding. The archaeological investigation conducted as part of the EA/IS complied with all applicable provisions of NAGPRA.

Coastal Zone Management Plan

The authority to analyze projects conducted, funded, or approved by the federal government is granted to coastal states under the Coastal Zone Management Act of 1972, 16 USC, Section 3501 et seq. (CZMA). The CZMA encourages coastal states to develop local coastal management plans, balancing environmental concerns, such as recreation use and environmental control, with development concerns. Under Section 307(c)(i) of the CZMA, projects that directly affect lands or water of the coastal zone must be carried out in a manner consistent with the approved state coastal zone management program. The Selected Alternative has been analyzed per the CZMA, and implementation would not conflict with any adopted coastal plan.

Endangered Species Act

The Endangered Species Act of 1973 and Title 16 (implementing regulations) of the United States Code of Regulations (CFR) 17.1 et seq. designate and provide for protection of threatened and endangered plants and animals and their critical habitat. The U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service-NOAA were contacted regarding this alternative. The Project Record includes letters and species lists from both agencies that identify federally listed species with the potential to occur in the Bay and in the United States Geological Survey (USGS) San Francisco North quadrangle map. No species protected by the ESA would be affected implementation of the Selected Alternative.

Federal Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C., Sec. 703, Supp. I, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs.

Migratory birds include geese, ducks, shorebirds, raptors, songbirds and many others. The Migratory Bird Executive Order of January 11, 2001 directs executive departments and agencies to take certain actions to further implement the MBTA, and defines the responsibilities of each federal agency taking actions that have, or are likely to have, a measurable effect on migratory bird populations. The incorporation of Mitigation Measure BIO-1 ensures that the Selected Alternative will protect any and all bird species subject to the MBTA.

Clean Water Act

The Clean Water Act established water quality standards for surface waters and the basis for regulating the discharge of pollutants into the waters of the United States. Under the Clean Water Act, the EPA has implemented pollution control programs including wastewater standards for industry and water quality standards for contaminants in surface water, including coastal and marine water bodies. The primary purpose and need of the Selected Alternative is to improve the quality of water discharging from the SMCS D treatment plant into the Bay, and comply with the provisions of this Act.

Executive Order 11990

Executive Order 11990 of 1977, Protection of Wetlands, was an amendment to the NEPA of 1969. The purpose of Executive Order 11990 is to minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. The Selected Alternative will not result in any direct or indirect adverse effects on wetlands.

Executive Order 11988

Executive Order 11988 of 1977, Floodplain Management, was another amendment to the NEPA of 1969. It requires federal agencies to avoid to the extent possible adverse impacts to flood plains including direct and indirect development of them if there is a practical alternative. The Selected Alternative will not result in any direct or indirect adverse effects on floodplains.

Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments)

The Executive Order 13175 provides for regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications. NPS Management Policies (NPS 2006; chapter 8.2 and 8.6) state that the NPS will make reasonable efforts to provide for the protection, safety, and security of park visitors, employees, concessionaires, and public and private property; and to protect the natural and cultural resources entrusted to its care. The cultural resources analysis has included consultation and coordination with the Ya-Ke-Ama and the Federated Indians of Graton Rancheria in compliance with this order.

Clean Air Act

The NPS has a responsibility to protect air quality under the Clean Air Act and the 1916 Organic Act (16 USC §1). NPS management policies state: “The Service will seek to perpetuate the best possible air quality in parks to (1) preserve natural resources and systems; (2) preserve cultural resources; and (3) sustain visitor enjoyment, human health, and scenic vistas. Vegetation, visibility, water quality, wildlife, historic and pre-historic structures and objects, cultural landscapes, and most other elements of a park environment are sensitive to air pollution and are referred to as ‘air quality- related values.’ The Service will assume an aggressive role in promoting and pursuing measures to protect these values from the adverse impacts of air pollution. In cases of doubt as to the impacts of existing or potential air pollution on park resources, the Service will err on the side of protecting air quality and related values

for future generations.” (NPS 2006) The Selected Alternative will comply with all provisions of the Clean Air Act.

Executive Order 13514

Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, outlines policies intended to ensure that federal agencies evaluate climate change risks and vulnerabilities and manage the short- and long-term effects of climate change on their operations and mission. The EO specifically requires the Army to measure, report, and reduce its GHG emissions from direct and indirect activities. The CEQ recently released draft guidance on when and how federal agencies should consider GHG emissions and climate change in NEPA analyses. The EA/IS included analyses of climate change and GHG emissions and determined that the Selected Alternative would not result in adverse effects to either resource.

Comprehensive Environmental Response, Compensation, and Liability Act

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the EPA has authority to respond to hazardous material releases that would affect public safety. CERCLA establishes cleanup standards for National Priority Sites, and creates liability for waste site operators, and uses a trust fund to clean up abandoned sites, also known as Superfund sites. There are no superfund sites at or in the vicinity of the Selected Alternative.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was established in 1976 (42 USC s/s 6901 et seq.) by the EPA to regulate all aspects of hazardous waste, including generation, transportation, storage, and disposal. It establishes national minimum requirements for solid waste disposal sites, and requires states to develop plans for managing wastes in their jurisdictions. RCRA Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Under the Selected Alternative, an underground storage tank will be removed and replaced with an aboveground storage facility per the requirements of this Act.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 (15 USC s/s 2601 et seq.) gives EPA the ability to track and control chemicals through record-keeping and testing requirements. The Toxic Substances Control Act addresses the importation, use, and disposal of chemicals such as polychlorinated biphenyls, asbestos, lead-based paint, and radon. The Selected Alternative will be implemented per the provisions of this Act.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT OF THE QUALITY OF THE HUMAN ENVIRONMENT

The applicable NEPA criteria from 40 CFR Sec. 1508.27 was considered in determining whether the selected alternative would have a significant effect on the quality of the human environment.

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.

The analysis conducted in the EA/IS determined that no potentially significant adverse effects on the quality of the human environment would occur, either individually or cumulatively with other projects in the area. Most environmental resource areas analyzed in the EA/IS would not be impacted either by construction or operation of the selected alternative. For those resource areas that would be impacted, the level of impact would either be less than significant, or less than significant with the incorporation of mitigation measures. These mitigation measures would be applied to vegetation and wildlife, cultural resources, geology and soils, and air quality and greenhouse gases. These mitigation measures have been accepted by the NPS and the SMCSD as feasible and reasonable, and will be incorporated into the development of the Selected Alternative. Additionally, compliance with all applicable federal laws and regulations will be applied to the Selected Alternative. These include compliance with EISA, CERCLA, RCRA, the Clean Water Act, the Clean Air Act, and several executive orders.

The Selected Alternative would result in beneficial impacts to water quality, and coastal and marine resources by improving the quality of water discharging from the treatment plant, especially during wet weather flows. The improved quality of water discharge would result in improved water quality for the bay, and the coastal and marine vegetation and wildlife species that depend on the bay for their sustenance.

Degree of effect on Public Health or Safety

The selected alternative would not result in potentially significant adverse impacts to public health and safety. The SMCSD currently operates within state and federal regulations for storage of hazardous materials, air quality emissions, and water quality and discharge requirements. The Selected Alternative would be constructed and operated in compliance with these regulations, and would not result in adverse effects that would conflict with these regulations. The Selected Alternative is necessary for compliance with federal EPA directives to improve the quality of water discharging into the bay. Therefore, the Selected Alternative would have beneficial effects to public health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The SMCSD treatment plant is located within the Fort Baker area of the GGNRA, and is within the vicinity of identified cultural resources. Accordingly, a historical evaluation of the plant was conducted to determine whether the existing buildings were eligible for listing in the NRHP. This evaluation determined that the plant buildings were not eligible. The SHPO concurred with these findings. Additionally, an archaeological investigation was conducted of a suspected cemetery site; no evidence of human remains was uncovered.

The Selected Alternative will not result in any potentially significant adverse impacts to parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

Degree to which -effects on the quality of the human environment are likely to be highly controversial.

The Selected Alternative has not resulted in public controversy or opposition. Consultation and coordination with federal and state agencies, including the SHPO, have already occurred. The SHPO concurred with the findings of the historical evaluation of the SMCSD treatment facility, and the determination that the facility was not eligible for listing in the National Register of Historic Places.

Additionally, tribal consultation has occurred with representatives of the Ya-Ke-Ama and the FIGR regarding the scope and study of the archaeological investigation of the facility and the excavation of the suspected Sailors' Cemetery. Comments regarding the project from the public have generally been favorable.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

The EA/IS has analyzed the potential effects to the quality of the human environment from both construction and operation of the Selected Alternative. In the area of historical and archaeological resources where the potential for encountering unique or unknown risks was identified, additional historical and archaeological investigations were conducted. These investigations determined that no potential adverse impacts would occur. Additionally, mitigation measures have been built into the Selected Alternative to account for the possibility of encountering such artifacts as human remains, unique geological and paleontological resources, and the existing of bird species projected by federal law. Compliance with these measures will ensure that no adverse impacts occur from encountering these potential unique resources.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The Selected Alternative is being undertaken in response to directives from federal and state regulatory agencies concerned with water quality per the requirements of the Clean Water Act and various US EPA directives. The Selected Alternative is not being undertaken to promote future or unanticipated growth in the area that has not already been subject to environmental analysis and consideration. Other projects within the Fort Baker area of the GGNRA have been included in the cumulative analysis in the EA/IS, and no potentially significant cumulative impacts were identified.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The NPS and GGNRA included consideration of all applicable cumulative projects for analysis in the EA/IS. These cumulative projects included area plans, such as the *Marin Headlands and Fort Baker Transportation Infrastructure and Management Plan* and the *Fort Baker Plan*, as well as specific projects including the *Marin Equestrian Stables Plan* and the *Alexander Avenue-Danes Drive Intersection Improvements*. These projects represented the past, present, and reasonably foreseeable actions, that with the Selected Alternative, could result in cumulative impacts. Each of the environmental resource areas studied included an analysis of cumulative impacts to include these actions. No potentially significant cumulative impacts were identified.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The SMCS D treatment facility is within the eastern boundaries of the National Register-listed Forts Baker, Barry and Cronkhite Historic District. The facility is not located near the military-era historic buildings and coastal fortifications that make up the district and implementation of the Selected

Alternative would not be visible or impact the setting of the historic district. As part of the analysis of cultural resources in the EA/IS, a historical evaluation of the plant was conducted to determine whether the existing buildings were eligible for listing in the National Register of Historic Places. This evaluation determined that the plant buildings were not eligible, and that the Selected Alternative would not adversely affect the Historic District. The State Historic Preservation Office concurred with these findings. Additionally, an archaeological investigation was conducted of a suspected cemetery site thought to potentially contain the remains of several sailors. Per the results of the investigation, no evidence of human remains was uncovered, and no additional testing was directed by the NPS.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

The EA/IS included an analysis to wildlife and vegetation from construction and operation of the Selected Alternative. No special status species nor the typical habitats associated with their presence occur at or in the vicinity of the Selected Alternative. Mitigation measures have been identified to address potential impacts to bird species projected by the federal Migratory Bird Treaty Act, as well as measures to address the potential spread of Sudden Oak death. These measures will be implemented prior to construction activities and will ensure that no adverse impacts to endangered or threatened species or their habitat will occur.

Whether the action threatens a violation of federal, State, or local environmental protection law.

Implementing the Selected Alternative would bring the SMCSD treatment plant in compliance with federal and state laws and regulations concerning water quality, including the federal Clean Water Act and various US EPA directives. Additionally, the Selected Alternative has been analyzed in the EA/IS per the requirements of NEPA, as well as all applicable federal, state, and local laws, regulations, and ordinances. The Selected Alternative would not violate any of these laws.

MITIGATION MEASURES

The EA/IS has determined that the Selected Alternative would result in no effects on agricultural resources, land use and planning, mineral resources, population and housing, public services, or utilities and service systems.

The following lists the mitigation measures that will be implemented as part of the Selected Alternative. The NPS Project Manager will ensure the mitigation measures get incorporated into the contract for the contractor selected to conduct the work for SMCSD. During construction, SMCSD will provide NPS periodic monitoring reports describing the implementation and efficacy of the mitigation measures.

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 will be done by a National Park Service (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 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 not be significant.

Mitigation Measure BIO-2. Tree removal and trimming 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 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 be cleaned of vegetation and mud.

Mitigation Measure CUL-1. The applicant will implement the following protocols for unanticipated archeological discoveries and human remains during construction:

- Prior to construction, workers and supervisors 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;
- If buried archeological resources such as chipped stone or groundstone, historic debris, building foundations, or human bone are discovered during ground disturbances, work shall stop in that area (typically a minimum of 50 feet radius) of the project until a qualified archaeologist can assess the significance of the find;
- The SMCSD Treatment Plant Upgrade Project Manager (415-332-0244) and the Golden Gate National Recreation Area (GGNRA) Park Archaeologist will immediately be notified (415-289-1891 or 415-289-1893).
- Inadvertent discoveries will be treated in accordance with 36 CFR 800.13 (Protection of Historic Properties: Post-review discoveries). Archaeological resources will be assessed for eligibility for listing on the National Register of Historic Places and a determination of the project effects on the property will be made;
- Assessment of inadvertent discoveries may require archeological excavations and/or archival research to determine resource significance. If the site will be adversely affected, a treatment plan will be prepared in consultation with the State Historic Preservation Office;
- Treatment plans will fully evaluate avoidance, project redesign, and data recovery alternatives before outlining actions proposed to resolve adverse effects;
- If human skeletal remains or burial features are encountered all work shall stop in the vicinity of the discovery, and the find will be secured and protected in place;
- The Marin County Coroner, Park Archeologist and the SMCSD Treatment Plant Upgrade Project Manager will be immediately notified;
- If remains are determined to be Native American, and that no further coroner investigation of the cause of death is required, the coroner will then be required to contact the Native American Heritage Commission (pursuant to Section 7050.5(c) of the California Health and Safety Code) and the County Coordinator of Indian Affairs;
- The NPS will also initiate consultation with relevant tribes. No additional work shall take place near the find until the identified actions have been implemented. Discovered remains will be treated in accordance with the Native American Graves Protection and Repatriation Act Regulations at 43 CFR 10.4 (Inadvertent discoveries) as appropriate.

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 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 (GGNRA 2012).

Any chert excavated during the Proposed Action that is appropriate for use as a trail, overlook, or parking area tread should be used for tread rather than to backfill areas or for trail or road base. Good quality chert is considered valuable and should be used as tread whenever possible. The reuse of chert as tread will also mitigate the loss of radiolarian fossils commonly found in that rock (GGNRA 2012).

Mitigation Measure GEO-2. Paleontological resources are protected as described in the NPS *Management Policies 2006*, Section 4.8.2.1, Paleontological Resources and Their Contexts. According to the policy “All NPS construction projects in areas with potential paleontological resources must be preceded by a preconstruction surface assessment prior to disturbance. For any occurrences noted, or when the site may yield paleontological resources, the site will be avoided or the resources will, if necessary, be collected and properly cared for before construction begins. Areas with potential paleontological resources must also be monitored during construction projects (NPS 2006).”

If there is no source within the GGNRA for the approximately 500 cubic yards of imported aggregate base rock needed for the Proposed Action, then the material can be imported from an outside source. All earth materials must be tested before being imported into the GGNRA. Earth materials brought into GGRNA can either be from an approved vender or be tested for hazardous materials before being imported (GGNRA 2012).

Mitigation Measure AIR-1. The control measures from the Bay Area Air Quality Management District (BAAQMD) 1999 CEQA Guidelines will be implemented to reduce air quality impacts from construction. These measures will be specified in the construction management plan and the construction site supervisor will be responsible for ensuring, verifying, and documenting compliance.

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- 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.
- Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

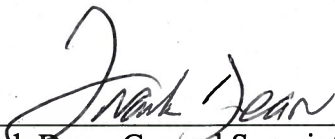
- Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 30 seconds (as required GGNRA Vehicle Idling Standard Operating Procedures adopted by GGNRA in compliance with State of California regulations for In-Use Off-Road Diesel Vehicles [Title 13 CCR, Section 2449(d)(3)]). Clear signage shall be provided for construction workers at all access points.


Mitigation Measure AIR-2. The BAAQMD will 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 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.

FINDING

The NPS has considered the analysis and information in the EA, including supporting environmental documentation, agency and public comments, and the project’s administrative record. Based on NPS guidance, policies, monitoring, and experience, and the capability of mitigation measures to avoid, minimize, or eliminate impacts; it is the determination that the selected alternative is not a major federal action having the potential to substantially affect the quality of the human environment.

The NPS has determined there are no significant direct, indirect or cumulative effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the region. The selected alternative is neither scientifically nor publicly controversial. Implementation of the selected alternative will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any federal, state, or local law. Implementation of the selected alternative is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared.

Recommended:  2/24/15
 Frank Dean, General Superintendent Date
 Golden Gate National Recreation Area
 National Park Service

Approved:  03/04/2015
 Christine S Lehnertz, Regional Director Date
 Pacific West Region
 National Park Service

Attachment A

Determination of No Impairment SAUSALITO-MARIN CITY SANITARY DISTRICT TREATMENT PLANT UPGRADE PROJECT

**National Park Service, U.S. Department of the Interior
Golden Gate National Recreation Area
March 2015**

NPS Management Policies 2006 (§1.4) requires analysis of potential effects to determine whether or not proposed actions will impair a park's resources and values. The fundamental purpose of the national park system established by the Organic Act and reaffirmed by the General Authorities Act, as amended, mandates that NPS conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give NPS management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave resources and values unimpaired unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. Non-resource topics are generally not subject to impairment assessment. Whether an impact could lead to impairment depends on the particular resources that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

An impairment determination is not made for all impact topics analyzed for the selected alternative. An impairment determination is not made for land use, socioeconomic, transportation and circulation, recreation and visitor use, public health and safety, and public services and utilities because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. The following consideration of impairment only applies to the following resource impacts evaluated in the EA which pertain to the Selected Alternative.

Special-Status Species

Construction and operation of the Selected Alternative would not result in adverse direct or indirect impacts to special status species. No special status species have been observed nor are likely to occur within the project area. The mission blue butterfly is known to inhabit the Fort Baker area; however, this species is dependent on lupine plants and due to the extensive forest cover at the project site and vicinity, there is no lupine or other nectar sources present that could serve as food sources to the butterfly. Additionally, no monarch butterflies have been observed in the project area, and the Monterey pine, Monterey Cypress, and eucalyptus trees associated with the species are not present at the project site or vicinity. Therefore, there would be no impairment to special status species as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Vegetation and Wildlife

Construction of the Selected Alternative would involve the removal of an estimated 75 trees, primarily for the relocated access road. Although trees would be replanted in areas where feasible, the short-term loss of these trees would reduce the habitat for birds either nesting or roosting at the project site. To address this potential impact, Mitigation Measure BIO-1 would include a pre-construction breeding season survey of the project area by a NPS-approved biologist to determine the presence of birds that are protected by the Migratory Bird Treaty Act. If birds protected by this statute are found, construction will be delayed, as necessary, within 500 feet of active bird nests until any eggs have hatched and birds have fledged. Potential impacts related to Sudden Oak death would be addressed through Mitigation Measure Bio-2, where removed vegetation will be either left on site or hauled to a NPS-permitted recycling center in Marin County. Incorporation of these mitigation measures will ensure that no impairment to vegetation and wildlife will occur as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Air Quality

Construction of the Selected Alternative will generate short-term emissions through the activities of construction vehicles and equipment. These emissions are temporary and would not result in air quality impacts that would violate any air quality standard or threshold. Further, Mitigation Measure AIR-1 would establish idling times for construction vehicles, and require dust control measures to be employed at the site to minimize any impacts related to fugitive dust. Operationally, Mitigation Measure AIR-2

would require an air quality analysis to be performed to determine if any additional permitting is required for the new sources of equipment and other components that comprise the Selected Alternative.

The SMCS D treatment plant currently operates within a Bay Area Air Quality Management District (BAAQMD) permit, and is within compliance with all terms of this permit. The Selected Alternative would include filters and other devices for wastewater treatment that would address and improve odors emanating from the facility. These devices include grit removal and screening systems as part of the headworks component, and covers for the primary and secondary treatment systems to control and minimize odors. These Selected Alternative components would provide increased odor control compared to current conditions, and would result in decreased odors at the treatment plant site as well as nearby locations within Fort Baker and the GGNRA that are frequented by bicyclists, hikers, and other recreational users. Therefore, there would be no impairment to air quality resources as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Coastal and Marine Resources

Coastal and marine resources would not be directly impaired by implementation of the Selected Alternative. The ground disturbance associated with relocation of the existing access road will be near the coastline, but would not result in alteration of the coastline. Public access to coastal and marine resources will continue through construction and operation of the Selected Alternative along the access road leading from the Bay Trail and East Road to the Bay. Long-term operational effects related to sea level rise will be minor. Sea-level rise is expected to occur gradually throughout this century, and the major components of the headworks, secondary and tertiary treatment systems of the Selected Alternative will be constructed above projected sea-level rise scenarios for both mid-century and end of century scenarios. Several connecting pipes through these systems could result in placement at or below projected sea-level rise scenarios for both mid-century and end of century conditions; however, these pipeline systems will be designed to withstand the potential impacts of a submerged or partially-submerged environment. Therefore, there would be no impairment to coastal and marine resources as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Water Resources

Implementation of the Selected Alternative would not have any adverse impacts to ground water, surface water, or water runoff. Construction of the relocated access road would result in a slight alteration to an existing stormwater drainage channel, but the flow of this channel would still be directed toward the Bay. Construction and operation would be subject to all applicable laws regarding water quality and stormwater flows, such as the Clean Water Act, and the Energy Independence and Security Act. Further, construction activities would be subject to all National Pollutant Discharge Elimination System (NPDES) provisions and Construction General Permit requirements, including Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices implementation.

The Selected Alternative would result in a net beneficial impact to water quality. The implementation of the headworks, secondary and tertiary treatment components would result in protecting the quality of the San Francisco Bay by avoiding wet weather blending during peak flows, and improving the overall quality of water discharging into San Francisco Bay. The long-term benefit would be a cleaner, healthier, and safer San Francisco Bay, both for the enjoyment and benefit of the human environment as well as the various species of vegetation and wildlife that depend on a healthy Bay environment to

sustain and nurture their species. Therefore, there would be no impairment to water resources as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Cultural Resources

The SMCS D treatment facility is within the eastern boundary of the Forts Baker, Barry and Cronkhite Historic District. The facility is not located near the military-era historic buildings and coastal fortifications that make up the district and changes to the existing facility and adjacent landscape would not be visible or impact the setting of the historic district. As part of the analysis of cultural resources in the EA/IS, a historical evaluation of the plant was conducted to determine whether the existing buildings were eligible for listing in the National Register of Historic Places. This evaluation determined that the plant buildings were not eligible, and that the Selected Alternative would not adversely affect the historic district. The State Historic Preservation Office concurred with these findings. Additionally, an archaeological investigation was conducted of a suspected cemetery site thought to potentially contain the remains of several sailors. Per the results of the investigation, no evidence of human remains was uncovered, and no additional testing was directed by the NPS. Therefore, there would be no impairment to cultural resources as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Geology and Soils

Construction of the Selected Alternative would require the removal of approximately 5,900 cubic yards of soil and rock, primarily for the relocated access road. To mitigate any potential loss related to this removal, excavation activities will be carried out in accordance with the GGNRA, Standard Operating Procedures for Managing Earth Materials per Mitigation Measure GEO-1. These procedures ensure that removed rock will be used throughout the GGNRA at sites and projects determined by the NPS, to ensure that these resources continue to be applied for park uses and resources. Soils with the possibility of containing paleontological resources will be handled according to NPA Management policies 2006, Sec. 4.8.2.1, per Mitigation Measure GEO-2. Soil erosion will be addressed through the ND PES process, including SWPPP measures and Best Management Practices. Therefore, there would be no impairment to geology and soils as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Visual Resources

The SMCS D treatment facility is in a cove along the San Francisco Bay surrounding by steep, wooded ridgelines. Because the facility is along the shore of the bay, the wastewater treatment buildings, pumps, and related appurtenant features are visible from the Bay and from various scenic viewsheds across the Bay, including Angel Island. However, when viewed from these locations, the facility is not visibly prominent, primarily due to its distance from these visual settings and its location in a sheltered bayside cove. The facility is not visible from most locations in the GGNRA, including Fort Baker and most locations in the Forts Baker, Barry and Cronkhite Historic District. The Selected Alternative would include physical features, such as secondary and tertiary treatment systems, that would be largely integrated into the current footprint. None of these features would be in areas in the facility easement that would result in noticeable increased visibility or result in sources of visible light or conditions causing glare that would be visible from viewsheds or scenic vistas within the GGNRA. Therefore, there would be no impairment to visual resources as defined under NPS Management Policies 2006, Sections 1.4.5 and 1.4.6.

Conclusion

As guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the Selected Alternative.