

VISTA GRANDE DRAINAGE BASIN IMPROVEMENT PROJECT EIR/EIS

Environmental Impact Report/
Environmental Impact Statement Addendum
State clearinghouse NO. 2013032001

Prepared for
City of Daly City
National Park Service

June 2025



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TABLE OF CONTENTS

Vista Grande Drainage Basin Improvement Project EIR/EIS Addendum

	<u>Page</u>
Acronyms and Other Abbreviations	iii
Section 1. Background and Purpose of the Addendum	1-1
1.1 Background	1-1
1.2 Summary of Past Analysis	1-1
1.3 Purpose of the Addendum	1-2
1.4 Determination and Addendum Conclusion	1-3
Section 2. Project Description	2-1
2.1 Prior Project Description	2-1
2.2 Proposed Modifications to the Project	2-3
Section 3. Discussion of Impacts	3-1
3.1 Aesthetics	3-3
3.2 Air Quality	3-6
3.3 Biological Resources	3-11
3.4 Cultural Resources	3-16
3.5 Geology and Soils	3-18
3.6 Greenhouse Gas Emissions and Climate Change	3-20
3.7 Hydrology and Water Quality	3-23
3.8 Noise and Vibration	3-27
3.9 Recreation	3-31
3.10 Energy Conservation	3-33
Section 4. References and Report Preparers	4-1
4.1 References	4-1
4.2 Lead Agency	4-3
4.3 Consultant	4-3
 List of Figures	
Figure 2-1 Modified Project Components (Canal)	2-5
Figure 2-2 Habitat Restoration Sites	2-6
Figure 2-3 Pacific Rod and Gun Club Work Area	2-10
Figure 2-4a Original Fort Funston Work Area	2-12
Figure 2-4b Modified Fort Funston Work Area	2-13
Figure 2-5a Original Ocean Outlet Construction Area	2-15
Figure 2-5b Modified Ocean Outlet Design	2-18

	<u>Page</u>
List of Tables	
Table 2-1	Restoration Site Locations and Areas (acres) 2-8
Table 3-1	Construction Criteria Pollutant Exhaust Emissions 3-7
Table 3-2	Estimated Project Construction Greenhouse Gas Emissions 3-21
Table 3-3	Typical Noise Levels Produced By Construction Equipment 3-28

Acronyms and Other Abbreviations

BAAQMD	Bay Area Air Quality Management District
Bay Area	San Francisco Bay Area
BMP	best management practice
Canal	Vista Grande Canal
CEQA	California Environmental Quality Act
CO ₂ e	carbon dioxide equivalent
Coastal Commission	California Coastal Commission
dBA	A-weighted decibels
DPM	diesel particulate matter
District	North San Mateo County Sanitation District
EIR	environmental impact report
EIS	environmental impact statement
ESHA	environmentally sensitive habitat area
GHG	greenhouse gas
hp	horsepower
lb/day	pounds per day
L _{dn}	day-night average sound level
Modified Project	minor revisions and additions to the Vista Grande Drainage Basin Improvement Project that have occurred since Project approval
NO _x	oxides of nitrogen
NPS	National Park Service
PG&E	Pacific Gas and Electric Company
PM _{2.5}	particulate matter 2.5 micrometers or less in diameter
PM ₁₀	particulate matter 10 micrometers or less in diameter
Project	Vista Grande Drainage Basin Improvement Project
ROG	reactive organic gases
SFDPW	San Francisco Department of Public Works
SFPUC	San Francisco Public Utilities Commission
TAC	toxic air contaminant
Tunnel	Vista Grande Tunnel
WSE	water surface elevation

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SECTION 1

Background and Purpose of the Addendum

1.1 Background

This environmental impact report/environmental impact statement (EIR/EIS) addendum has been prepared to address minor revisions and additions to the Vista Grande Drainage Basin Improvement Project (Project). The North San Mateo County Sanitation District (District)—a subsidiary of the City of Daly City, the lead agency responsible for administering the environmental review of the Project under the California Environmental Quality Act (CEQA)—and the National Park Service (NPS), the lead agency under the National Environmental Policy Act, completed an EIR/EIS (State Clearinghouse No. 2013032001) for the Project. The EIR/EIS addresses storm-related flooding that currently occurs in the Vista Grande Drainage Basin and proposes to provide other environmental benefits, including the restoration and management of water levels in Lake Merced.

This addendum describes minor revisions and additions (Modified Project) that have occurred since Project approval, reviews CEQA requirements for preparing an addendum, and substantiates the finding that the Modified Project would not result in new or more severe environmental impacts than previously disclosed in the EIR/EIS.

1.2 Summary of Past Analysis

1.2.1 Draft EIR/EIS

The Draft EIR/EIS, published on April 28, 2016, described the Project, identified the environmental consequences associated with the Project's implementation, and specified mitigation measures to reduce significant and potentially significant impacts. The NPS Notice of Availability for the Draft EIR/EIS was published in the *Federal Register* on April 29, 2016.

1.2.2 Final EIR/EIS

The Final EIR/EIS, published on September 8, 2017, consisted of the Draft EIR/EIS and the response to comments document. The Final EIR/EIS was also published in the *Federal Register* on September 15, 2017.

1.2.3 Notice of Determination/Record of Decision

The City of Daly City certified the EIR/EIS, adopted CEQA findings, and implemented a mitigation monitoring and reporting program on December 11, 2017. Daly City filed the Notice of

Determination with San Mateo County on December 13, 2017. A Record of Determination was adopted by the NPS on July 27, 2018.

All the documents described above are herein incorporated by reference.

1.3 Purpose of the Addendum

The CEQA Guidelines (Sections 15162 and 15164) allow a lead agency to prepare an addendum to a previously certified EIR if some changes or additions to the environmental evaluation of a project are necessary, and the following conditions are met:

1. There are no substantial changes in the project which require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the previous EIR due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, which shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR.
 - b. Significant effects previously examined will be substantially more severe than disclosed in the previous EIR.
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The District proposes to make the following modifications to the Project:

- Changing the Vista Grande Canal (Canal) staging areas and components.
- Installing a water recirculation pump.
- Adding habitat restoration sites around Lake Merced.
- Using the Pacific Rod and Gun Club as a work area.
- Revising the Fort Funston work area.
- Updating the power source to be used during construction activities.
- Using ventilation fans during work in the Vista Grande Tunnel (Tunnel).
- Removing the wing walls from the final design of the Ocean Outlet at Funston Beach.

See Section 2.1, *Prior Project Description*, for a full description of the Project.

1.4 Determination and Addendum Conclusion

This addendum concludes that the Modified Project would not result in any new significant impacts not previously disclosed in the EIR/EIS, and it would not result in a substantial increase in the magnitude of any significant environmental impact previously identified. Additionally, there is new information that shows that the mitigation measures previously found not to be feasible would in fact be feasible, or that mitigation measures or alternatives considerably different from those analyzed in the previous EIR/EIS would substantially reduce one or more significant effects on the environment. The Modified Project would also be subject to the mitigation measures already adopted as part of the mitigation monitoring and reporting program. Therefore, an addendum to the EIR/EIS is sufficient to meet the requirements of CEQA Section 15164. The addendum to the EIR/EIS serves as documentation that the Modified Project described in Section 1.3, *Purpose of the Addendum*, does not trigger any of the conditions outlined in CEQA Guidelines Section 15162 that would require a subsequent EIR/EIS. Therefore, a subsequent EIR/EIS is not required.

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SECTION 2

Project Description

2.1 Prior Project Description

The following discussion provides a description of the Project construction and operation elements that would be affected by the proposed modifications. Therefore, construction and operation elements that would change under the Modified Project are not discussed further.

2.1.1 Project Location

As described in Section 2.2, *Project Location*, of the EIR/EIS, the Vista Grande Basin (the watershed that drains into the Canal) is located in Daly City and in unincorporated Broadmoor Village in northwestern San Mateo County. This watershed covers approximately 2.5 square miles and is bordered by San Francisco to the north, the Colma Creek watershed to the south and east, and Thornton State Beach and the Pacific Ocean to the west. The Canal and Tunnel are located primarily within the city and county of San Francisco. The Canal alignment runs adjacent to John Muir Drive and the southwestern shoreline of Lake Merced, with a small portion of the beginning of the Canal situated within unincorporated San Mateo County. The Tunnel extends beneath private lands, Skyline Boulevard, and Fort Funston—a former U.S. Army installation now managed by NPS as part of the Golden Gate National Recreation Area. The Tunnel outlet is located at the Pacific Ocean on Fort Funston Beach.

2.1.2 Project Components

As described in Section 2.4, *Proposed Project Components*, of the EIR/EIS, the Project would improve stormwater drainage and minimize flooding risk, provide a water source for Lake Merced management, improve recreational access to and reduce litter deposition at the beach below Fort Funston, and maximize the use of existing infrastructure and rights-of-way. The Project would consist of the following:

- Partially replacing the existing Canal to incorporate a gross solid screening device, a constructed treatment wetland, and diversion and discharge structures. These modifications would route some stormwater (and authorized non-stormwater) flows from the Canal to Lake Merced and allow lake water to be used for summer treatment wetland maintenance. The operation would be implemented in accordance with the initial Vista Grande Operational Plan, which is part of the proposed Lake Management Plan.
- Modifying the existing effluent gravity pipeline to enable year-round conveyance of treated effluent from the nearby District wastewater treatment plant to the existing outlet and diffuser by gravity, while abandoning the force main pipeline.

- Modifying the existing lake overflow structure to include an adjustable weir and siphon that allows water from the lake to flow into the Canal and Tunnel.
- Replacing the existing Tunnel to expand its hydraulic capacity and extend its operating lifetime and replacing the Lake Merced Portal to the Tunnel.
- Replacing the existing Ocean Outlet structure and a portion of the existing 33-inch submarine outfall pipeline that crosses the beach at Fort Funston.
- Implementing a prioritized suite of best management practices (BMPs) within the Vista Grande Basin storm drain system upstream of the Canal or within the Lake Merced watershed.

Operational components of the Project, described further below, would include managing the water surface elevation (WSE) in Lake Merced and implementing a Lake Management Plan (see Appendix A of the EIR/EIS).

Additionally, the Project includes NPS execution of a Special Use Permit for construction activities within Golden Gate National Recreation Area lands and the expansion of the rights-of-way to accommodate the replacement of the Ocean Outlet structure.

2.1.3 Project Construction

As discussed in Section 2.5, *Project Construction*, of the EIR/EIS, the construction phase would require approximately 1,300 kilowatts of electricity, primarily for Tunnel construction activities. For a conventional tunneling operation, the estimated minimum required power connection is about 3,000 kilovolt-amperes. Temporary construction power would be provided in the staging area at Fort Funston via a temporary Pacific Gas and Electric Company (PG&E) service connection. An emergency power supply (generator) with a capacity of 1,000 kilovolt-amperes would be located on-site during construction.

Staging and work areas would be established for each segment of the Project site to store contractors' construction equipment and materials (e.g., vehicles, fuels, lubricants). The staging and work areas may also be used to stockpile excavated soil for eventual reuse during construction. Areas of temporary disturbance would be restored to pre-Project conditions or similar. Staging and work areas described in the EIR/EIS include the following:

- **Box culvert, diversion structure, and Lake Merced Portal:** Staging areas would be adjacent to work areas. Construction and staging areas adjacent to John Muir Drive would be enclosed by chain-link fencing erected along John Muir Drive. These areas have no existing public access.
- **Diversion to Impound Lake—John Muir Drive Crossing:** An internally braced sheet pile excavation would cross John Muir Drive. Chain-link fencing would be placed around the excavation. Traffic and pedestrian access would be temporarily rerouted around the excavation.
- **Shaft staging and shotcrete installation:** The Fort Funston staging area and the area used for shotcrete installation would likely have chain-link fencing around the perimeter. These are the only areas that would be excluded from public use during construction activities.

- **Ocean Outlet:** A U-shaped sheet pile cofferdam around the Ocean Outlet structure would form the barrier to exclude the public, including dogs, from the construction area and to isolate the work area from tidal waters. The cofferdam would extend slightly beyond the seaward extent of the existing outlet structure.

As discussed in Section 2.5.5, *Tree and Vegetation Removal*, of the EIR/EIS, trees would be removed in several areas: adjacent to the Canal to accommodate the Canal improvements, at the wetland treatment cell installation sites, along the portion of the diversion structure on the south side of John Muir Drive, and in Lake Merced Portal's vicinity. No trees would be removed from NPS-managed lands at Fort Funston. Permitting authority and regulations regarding tree and vegetation removal would vary throughout the site depending on the jurisdiction of the area affected.

2.2 Proposed Modifications to the Project

The Modified Project would include the following updates:

- Changing the Canal staging areas and components.
- Installing a water recirculation pump.
- Adding habitat restoration sites around Lake Merced.
- Using the Pacific Rod and Gun Club as a work area.
- Revising the Fort Funston work area.
- Updating the power source for construction activities.
- Using ventilation fans during work in the Tunnel. and
- Removing wing walls from the final design of the Ocean Outlet at Funston Beach.

The proposed Modified Project is described in further detail below.

2.2.1 Vista Grande Canal

As discussed in Section 2.4.1, *Vista Grande Canal Improvements and Diversion of Stormwater to Lake Merced*, and Section 2.5.1, *Canal Improvements and Diversion to Lake Merced*, of the EIR/EIS, the Project includes replacing the upstream portion of the Canal with a collection box, box culvert, debris screening device, and diversion structure that would enable the diversion of Canal flows into Lake Merced. A constructed treatment wetland would be developed in an area between John Muir Drive and the southern edge of the Canal to handle low flows (dry and wet) year-round. From the diversion structure, a box culvert would be constructed under John Muir Drive and a screened outlet structure would be constructed at the edge of Impound Lake. Improvements to the Canal components would be constructed from staging areas adjacent to the work areas.

Construction of the Canal improvements, diversion structure/pipeline, and treatment wetland would require site clearing and removal of vegetation in the area bounded by Lake Merced Boulevard, John Muir Drive, and the southern edge of the Canal. In Table 2-1, *Summary of*

Construction Requirements for Project Components, of the EIR/EIS, the staging area for the Canal portion is approximately 10 acres, with a final footprint of 4 acres. After completion of construction, staging areas, access routes, and other areas temporarily disturbed during construction would be revegetated with a mix of native, low-growing shrub species common to local riparian corridors and coastal scrub habitats.

Under the Modified Project, sites along the Canal that were part of the overall Project footprint but were not likely to be disturbed would be used as a staging area for work on the Canal. The Modified Project would add staging areas adjacent to the Canal between the rehabilitated Lake Merced Portal and Wetland Cell B, with a footprint of 1.24 acres (see **Figure 2-1**). Additionally, a permanent access ramp would be installed to access the areas adjacent to the Canal from the rehabilitated Lake Merced Portal, which would provide access for maintenance and service activities.

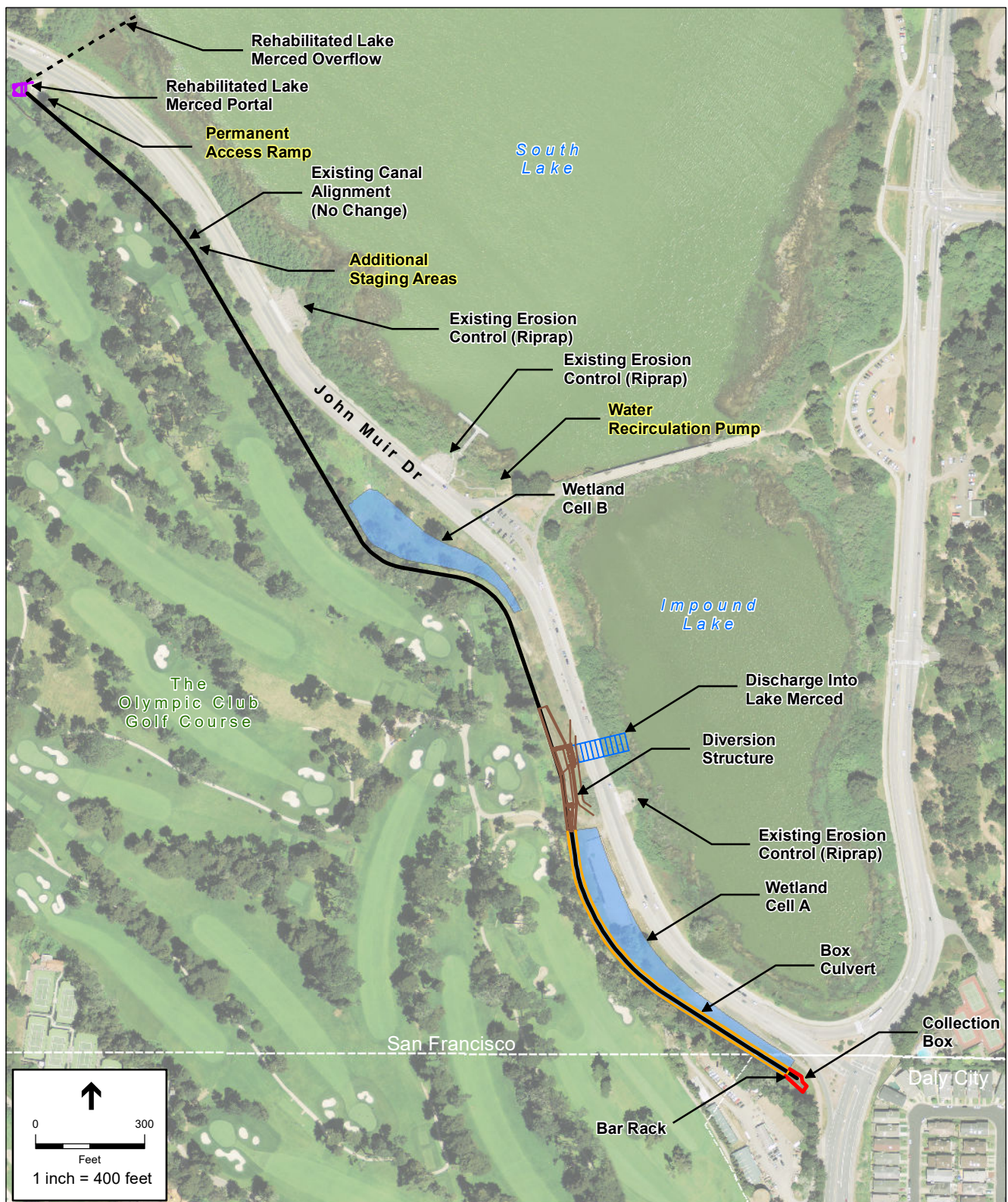
The additional staging areas may require the installation of temporary chain-link fencing around the perimeter to serve as a buffer and screen from public views; however, the proposed staging areas do not provide public access. The proposed staging areas would be restored to pre-Project conditions after completion of construction activities.

2.2.2 Water Recirculation Pump

As discussed above the treatment wetland would be developed along John Muir Drive to treat year-round low flows from the watershed to reduce sediment, suspended solids, metals, and nutrients. Low-volume stormwater flows, authorized non-storm flows, and recirculated lake water would be treated before release to Lake Merced. The wetland consists of two cells: Wetland Cell A, approximately 1.7 acres in size, and Wetland Cell B, 0.9 acre in size, for a total area of 2.6 acres.

To maximize lake water treatment during summer months, a flexible pipeline approximately 18 inches in diameter would be installed underground between South Lake and Impound Lake, as discussed in EIR/EIS Section 2.4.1.3, *Constructed Treatment Wetland*. During periods of high algae growth in South Lake, a skimmer—a floating structure with some wind protection that draws water from the upper few inches of the lake surface—would be used to uptake water with high algae concentrations and route it through the treatment wetland via a flexible pipeline. Although the skimmer and pipeline were discussed in the EIR/EIS, the project description did not identify the need for a water recirculation pump that would draw water from South Lake into the treatment wetlands. The Modified Project includes this pump, which would be installed underground, several feet from the bank of South Lake to pump water through the pipeline from South Lake into the diversion structure, then into the treatment wetland. The location of the proposed water recirculation pump is shown in **Figure 2-2**.

The Modified Project (i.e., pump at South Lake) would include construction activities similar to those described in the EIR/EIS and would be visible from public roadways. Additionally, the South Lake pump's construction would involve ground-disturbing activities similar to that described in the EIR/EIS and within the specified geotechnical conditions.



SOURCE: McMillen Jacobs Associates, 2013

Vista Grande Drainage Basin Improvement Project 200700036.01

Figure 2-1
Modified Project Components (Canal)



SOURCE: ESA, 2025.

Vista Grande Drainage Basin Improvement Project 200700036.01

Figure 2-2
Habitat Restoration Sites

2.2.3 Habitat Restoration Sites

As discussed in Section 3.4.5, *Impact Analysis (Biological Resources)*, of the EIR/EIS, the direct loss of jurisdictional wetlands and waters would have a potentially significant impact. The EIR/EIS included **Mitigation Measure 3.4-8b**, which requires restoration of temporary disturbance areas to pre-Project conditions, as required by regulatory permits. It would also offset unavoidable permanent impacts on jurisdictional wetlands, waters, and riparian habitat from Project components through compensatory mitigation, helping to ensure no net loss of regulated aquatic resources, as required by regulatory permits.

The EIR/EIS determined that Project operation would not adversely affect wetland habitats and other waters of the United States associated with Lake Merced, as modeling results predicted a net expansion of shoreline wetlands (see EIR/EIS subsection *Impacts of Lake Level Changes on Biological Resources at Lake Merced and Mitigation Measures* in Section 3.4.5).

The EIR/EIS included **Mitigation Measure 3.4-10a** and **Mitigation Measure 3.4-10b**, which would reduce potential impacts on wax myrtle scrub and Vancouver rye grassland resulting from Project implementation to less-than-significant levels. This would be achieved through managing water levels to avoid Project-related losses of sensitive communities or through compensatory mitigation if these losses cannot be avoided. **Mitigation Measure 3.4.10a** required that the overflow weir at South Lake be set no greater than 9 feet city datum to avoid significant impacts on the sensitive natural (upland) communities of wax myrtle scrub, Vancouver rye grassland, and eucalyptus forest, which would otherwise be lost in significant quantities from inundation under the Project. **Mitigation Measure 3.4.10b** required monitoring and compensation through habitat restoration for loss of these communities if the lake WSE would exceed 9 feet city datum for more than 14 days. The Modified Project would identify a WSE that would comply with **Mitigation Measure 3.4.10a** and would incorporate **Mitigation Measure 3.4.10b** if a future scenario required exceedance of 9 feet WSE for more than 14 days.

The EIR/EIS assumed that compensatory mitigation for impacts on regulated aquatic resources would occur at a minimum 1:1 ratio for affected arroyo willow riparian and freshwater marsh (wetland) habitat. It also assumed that this and any additional compensatory mitigation requirements from regulatory agencies issuing permits and authorizations for the Project would be fulfilled through the predicted passive expansion of open water habitat and freshwater marsh from Project operations raising the WSE, making the Project “self-mitigating.” The regulatory agencies that issued permits and authorizations for the Project in 2022 and 2023 (the U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and California Department of Fish and Wildlife) accepted the prediction that the passive expansion of open water habitat and freshwater marsh from the Project’s operations raising the WSE would adequately offset the Project’s permanent impacts on aquatic habitats, thus making it “self-mitigating.” The agencies required post-Project monitoring and reporting to verify success.

The California Coastal Commission (Coastal Commission) has regulatory authority over coastal wetlands and environmentally sensitive habitat areas (ESHAs) in the coastal zone. Much of the shoreline vegetation at Lake Merced was identified as an ESHA during the Project’s review by the Coastal Commission for its Coastal Development Permit. As a condition of approval in the

Project's Coastal Development Permit, the Coastal Commission indicated that the Project must compensate for the loss of ESHA and coastal wetlands due to the operational increase of Lake Merced's WSE. The Coastal Commission concluded that these specific types of habitat losses were not offset by the predicted passive expansion of aquatic habitats from Project operations raising the WSE. To address the Coastal Development Permit condition of approval, 10 acres of on-site habitat restoration have been added to the Project. The mitigation sites' locations and areas are listed in **Table 2-1** and depicted in Figure 2-2.

TABLE 2-1
RESTORATION SITE LOCATIONS AND AREAS (ACRES)

Site ID	Area (acres)	Location
1	0.68	North Lake
2	1.00	
3	0.70	
4	0.43	
5	0.29	
6	0.11	
7	0.60	
8	0.07	South Lake—west shore
9	1.88	
10	0.40	
11	2.54	
12	0.48	South Lake—east shore
13	0.28	
14	0.57	East Lake
Total*	10.0	

NOTE:

* Total is approximate due to rounding.

SOURCE: Data compiled by Environmental Science Associates in 2025

Restoration would include the removal of existing non-native and invasive plant species (including trees), followed by seeding, planting, and installing temporary irrigation. Under the Modified Project, approximately 804 trees around Lake Merced would be removed for the installation of the habitat restoration sites; however, the final number would depend on the final design and acreage of the chosen sites. The trees would consist primarily of blue gum eucalyptus (*Eucalyptus globulus*) and other non-native species, including myoporum (*Myoporum laetum*), Monterey cypress (*Hesperocyparis macrocarpa*), and blackwood acacia (*Acacia melanoxylon*), with several other native and non-native species in less abundance.

The habitat restoration sites would be planted primarily with native arroyo willow (*Salix lasiolepis*) trees to expand willow riparian habitat along the Lake Merced shoreline. Freshwater marsh (wetland) plants, including swamp knotweed (*Persicaria amphibia*) and California bulrush (*Schoenoplectus californicus*), would be planted at the lower elevations of the mitigation sites near the future operational WSE. Native species associated with coastal scrub habitat, such as

Pacific wax myrtle (*Morella californica*), flowering current (*Ribes sanguineum* var. *glutinosum*), California sagebrush (*Artemisia californica*), California blackberry (*Rubus ursinus*), sticky monkeyflower (*Diplacus aurantiacus*), and toyon (*Heteromeles arbutifolia*), would be planted at elevations above the arroyo willow at some sites to create upland fringe habitat. After planting, the willow riparian and coastal scrub habitats would be seeded with a native seed mix of herbaceous understory species.

Restoration plantings would require temporary irrigation during the establishment period of approximately 3 years, sourced from water lines operated by the City and County of San Francisco. The proposed plantings would use approximately 2.5 acre-feet of water per year after initial planting until vegetation is established. Additionally, seeded areas may use up to 3.5 acre-feet of water combined in the months immediately after seeding. The habitat restoration sites may also require the installation of temporary chain-link fencing or other material around the perimeter to serve as a buffer, screen the site from public views, and to discourage herbivory.

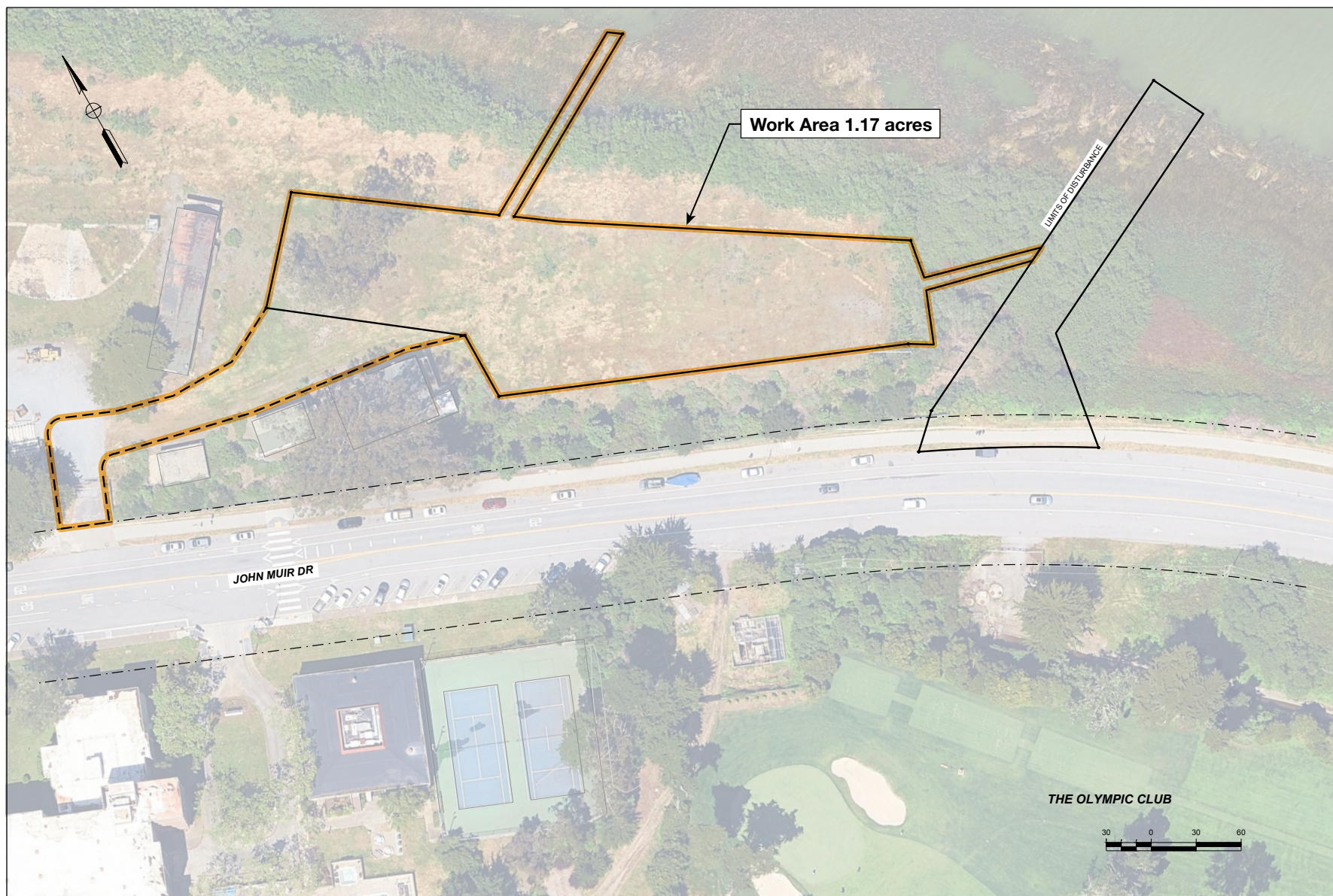
2.2.4 Pacific Rod and Gun Club Work Area

As discussed in Section 2.1, *Prior Project Description*, staging and work areas would be established for each segment of the Project site to store contractors' construction equipment and materials (e.g., vehicles, fuels, lubricants). The staging and work areas might also be used to stockpile excavated soil for eventual reuse during construction. Areas of temporary disturbance would be restored to pre-Project conditions or similar.

Since the certification of the EIR/EIS, Daly City and the San Francisco Public Utilities Commission (SFPUC) have discussed temporary use of the portions of the site previously known as the Pacific Rod and Gun Club. The Pacific Rod and Gun Club was closed in 2015, as part of SFPUC's Pacific Rod and Gun Club Upland Soil Remedial Action Project, during which lead and debris-contaminated soils associated with the Pacific Rod and Gun Club's operation were excavated and backfilled with clean material. The site is currently planned for redevelopment as part of an SFPUC and San Francisco Recreation and Parks Department project known as the Lake Merced West Project, which would redevelop the site into a public park and boat launch (SFPUC 2024).

Under the Modified Project, the Pacific Rod and Gun Club would be used as an additional work area (see **Figure 2-3**), located at the southeastern corner of the property along John Muir Drive. The work area would be approximately 1.17 acres in size and would be used for 6 months at a time or until component completion. The site would primarily be used as a work area during the implementation of the compensatory mitigation sites and for the installation of the in-water Project components. Using this site for construction work was not evaluated in the EIR/EIS and would be considered an addition to the Project.

The addition of the site as a construction work area would not require excavation or alteration of the landscape, and areas adjacent to structures within the Pacific Rod and Gun Club site would be avoided. The Pacific Rod and Gun Club work area would be restored to pre-Project conditions or similar after the completion of construction activities through seeding a native grassland seed mix to disturbed areas.



SOURCE: Brown and Caldwell, 2024; Google Earth, 2025

Vista Grande Drainage Basin Improvement Project. 200700036.01

Figure 2-3
Pacific Rod and Gun Club Work Area

2.2.5 Fort Funston Work Area

As discussed in Section 2.5.2, *Vista Grande Tunnel and East and West Portals*, of the EIR/EIS, the replacement Tunnel component would be constructed from a temporary construction shaft located at Fort Funston, in an approximately 4-acre area that would also be used as a construction work area (see **Figure 2-4a**). Most construction activities associated with the Tunnel would take place in this area. The work area would include space for loading and unloading trucks, materials and equipment storage, shop facilities, office trailers, and parking. Existing vegetation in this area would be cleared before the initiation of construction activities.

After certification of the EIR/EIS, modifications were made to the Project design. Under the Modified Project, the Fort Funston work area would be reduced to 2.5 acres, 1.5 acres smaller than originally estimated (see **Figure 2-4b**). The proposed modifications also include a new temporary work area located within the Fort Funston parking lot, 400 feet southwest of the Fort Funston tunnel and shaft work area.

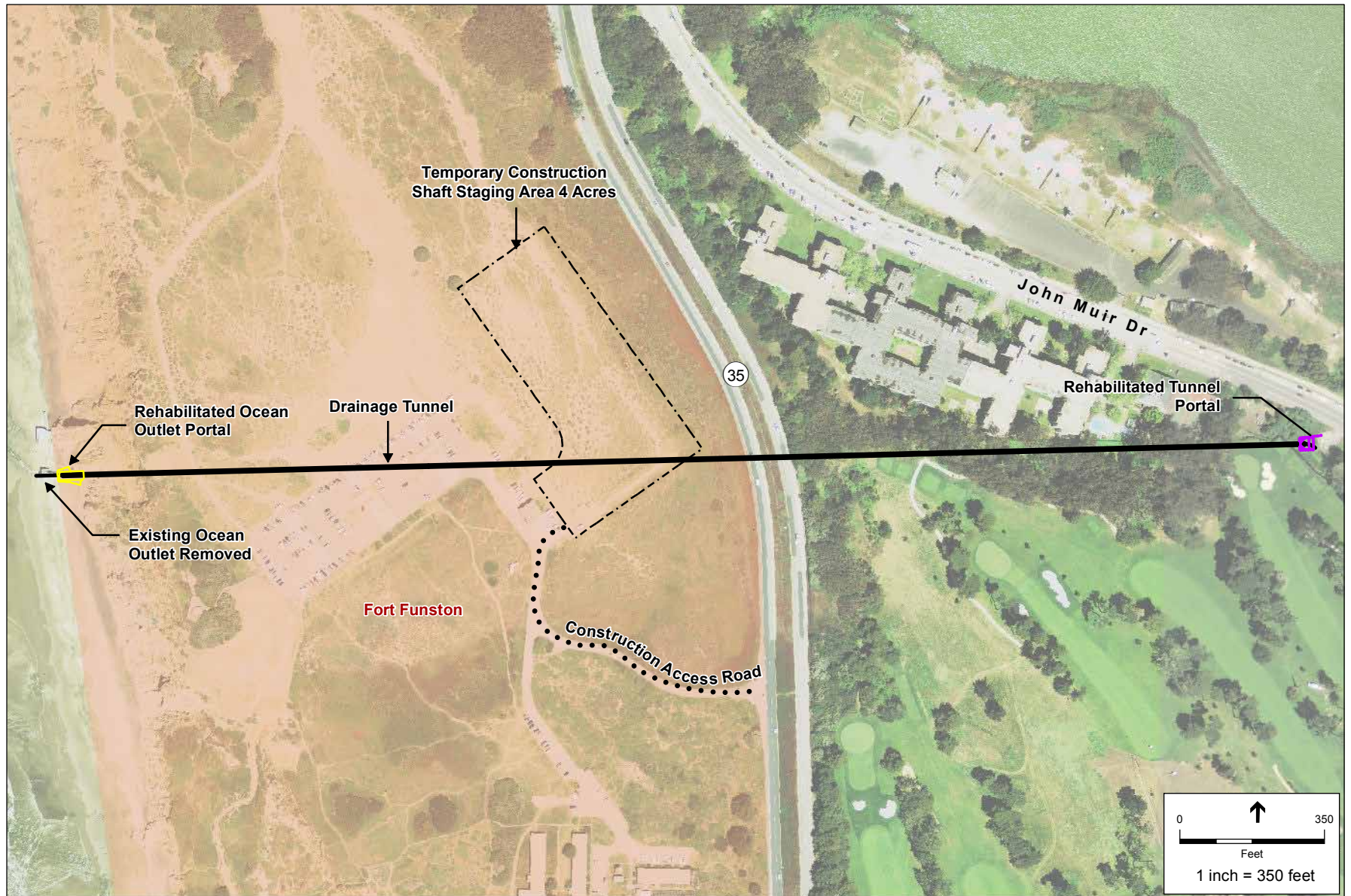
The new work area would be 0.44 acre and would be located in the northwest corner of the Fort Funston parking lot. The work area would be used for concrete fabrication work, with access from Fort Funston Road off Skyline Boulevard. Concrete fabricated at this work area would then be moved to the concrete pump work area to the west, located along the top of the bluffs above the Ocean Outlet location on Funston Beach.

The additional work area may require the installation of temporary chain-link fencing around the perimeter to serve as a buffer and screen the site from public views. After the completion of construction activities, the work areas would be restored to pre-Project conditions or similar, and disturbed areas would be regraded with native soils to match existing profiles. Additionally, the work areas would be revegetated with native coastal dune habitat, including species such as silver dune lupine (*Lupinus chamissonis*), mock heather scrub (*Ericameria ericoides*), and ice plant (*Carpobrotus edulis*).

2.2.6 Use of Diesel Generators

As discussed in Section 2.5.3.4, *Construction Power and Emergency Generators*, of the EIR/EIS, the electricity demand during construction would be 1,300 kilowatts, required solely for the Tunnel work area. This estimate includes equipment such as a road header or mini excavator, and ancillary equipment consisting of shotcrete application equipment, a batch plant, a compressor, pumps, ventilation fans, water treatment facilities, shop equipment, a warehouse, a change house, yard lighting, and office trailers. Temporary construction power would be provided to the work area at Fort Funston via a temporary PG&E service connection or a portable diesel-powered generator. If a temporary PG&E service connection is used, an emergency power supply (generator) with the capacity of 1,000 kilovolt-amperes would be located on-site during construction.

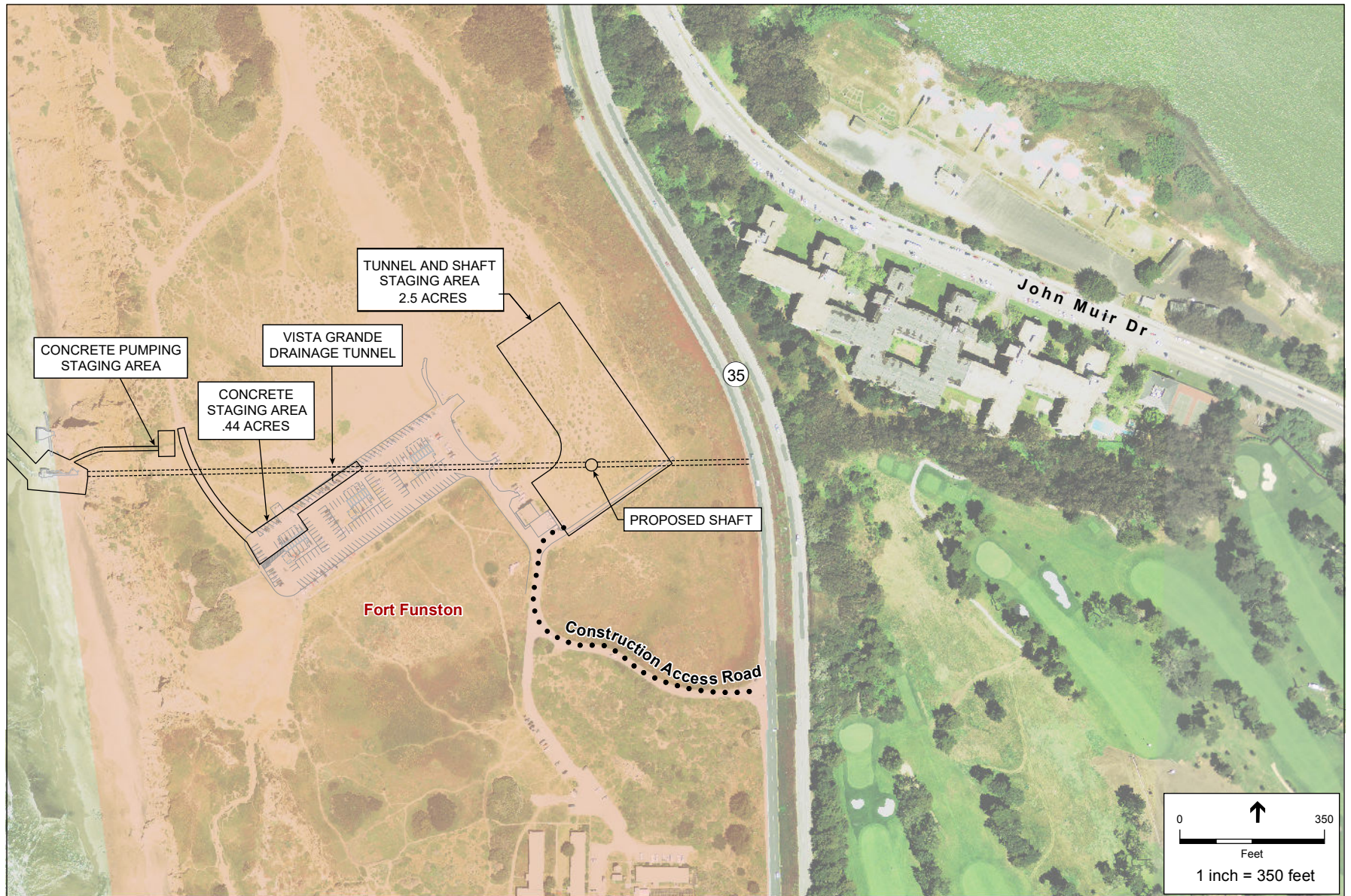
After certification of the EIR/EIS, Daly City determined that the use of a temporary PG&E service connection would not be feasible. Under the Modified Project, construction activities would be powered by seven additional generators ranging from 80 to 200 horsepower (hp). The generators would use diesel fuel and operate 24 hours a day, 5 days a week, until tunneling is



SOURCE: McMillen Jacobs Associates, 2013

Vista Grande Drainage Basin Improvement Project 200700036.01

Figure 2-4a
Original Fort Funston Work Area



SOURCE: Brown and Caldwell, 2024

Vista Grande Drainage Basin Improvement Project 200700036.01

Figure 2-4b
Modified Fort Funston Work Area

complete. The generators would be located within the Tunnel's rehabilitated east portal work area (see Figure 2-1) and the modified Fort Funston tunnel and shaft work area (see Figure 2-4b).

As discussed in *Fort Funston Work Area*, after the completion of construction activities, the work areas would be restored to pre-Project conditions or similar, and disturbed areas would be regraded with native materials to match existing profiles.

2.2.7 Ventilation at Tunnel Portals

As discussed in Section 2.4.2, *Vista Grande Tunnel and East and West Portals*, of the EIR/EIS, the existing Tunnel would be enlarged to increase its capacity to match the Canal's 500 cubic feet per second flow capacity and to extend its operating life by replacing the aging structure. The new Tunnel would have a concrete lining and a final internal diameter of approximately 9 feet. As discussed in Section 2.5.3, *Construction Schedule, Workforce, and Equipment*, a temporary 100 hp ventilation fan would be used for air circulation during the Tunnel construction activities and would be located within the Fort Funston tunnel and shaft work area.

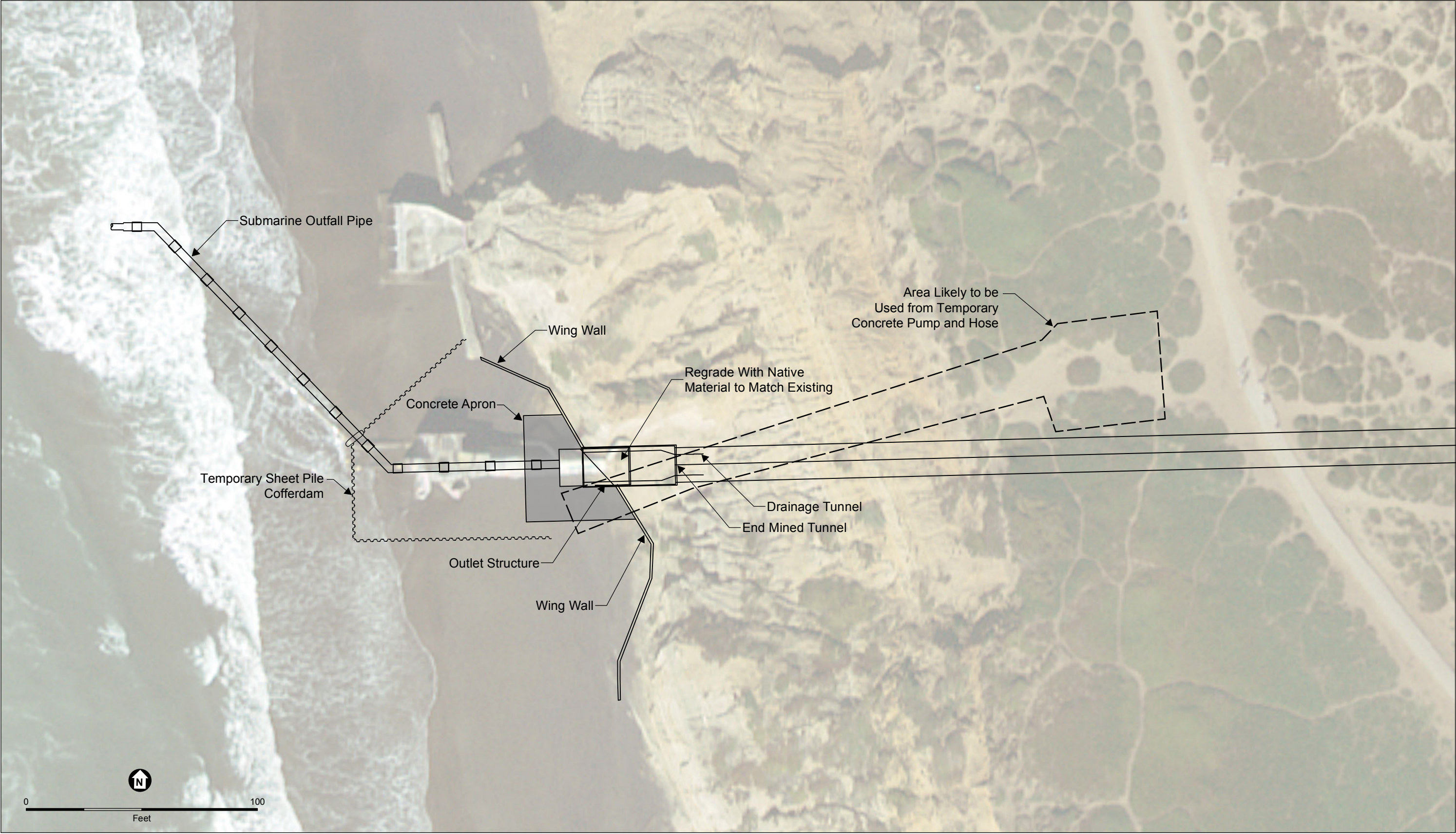
Under the Modified Project, the contractor would use two temporary ventilation fans for the Tunnel construction activities. These ventilation fans would circulate air within the Tunnel during the underground Tunnel construction activities. Each ventilation fan would contain a 100 hp motor powered by seven additional generators ranging from 80 to 200 hp (see *Use of Diesel Generators* above). The ventilation fans and generators would be located within the Tunnel's rehabilitated east portal work area (see Figure 2-1) and the modified Fort Funston tunnel and shaft work area (see Figure 2-4b).

After tunneling construction activities, all disturbed areas would be restored to pre-Project conditions or similar, and disturbed areas would be regraded with native materials to match existing profiles.

2.2.8 Ocean Outlet Design

As discussed in Section 2.4.2, *Vista Grande Tunnel and East and West Portals*, of the EIR/EIS, Daly City's existing Ocean Outlet structure is located on the beach below Fort Funston. This Ocean Outlet structure discharges the Vista Grande Watershed stormwater to the Pacific Ocean either through the submarine outfall pipeline during low flows or across the beach during higher flows. The Ocean Outlet structure, a segment of the Tunnel, and the force main segment are fully exposed to the surf and waves.

The Project would reconfigure these structures to provide protection from the surf and waves, including designing the system to withstand the force of high tides and associated waves. The existing Daly City Ocean Outlet structure would be removed and replaced with a low-profile outlet structure set nearer to the existing cliff face to improve beach access (see **Figure 2-5a**). Wing walls would be constructed to the north and south of the rehabilitated Ocean Outlet. To the north, an approximately 70-foot-long wing wall would be constructed from the Ocean Outlet structure to connect to an existing wing wall that extends south from SFPUC's Lake Merced Sewer tunnel outlet against the cliff face. Additionally, a 100-foot-long wing wall would be constructed to the south of the outlet to protect the cliff face (see Figure 2-5a).



SOURCE: McMillen-Jacobs Associates, 2019

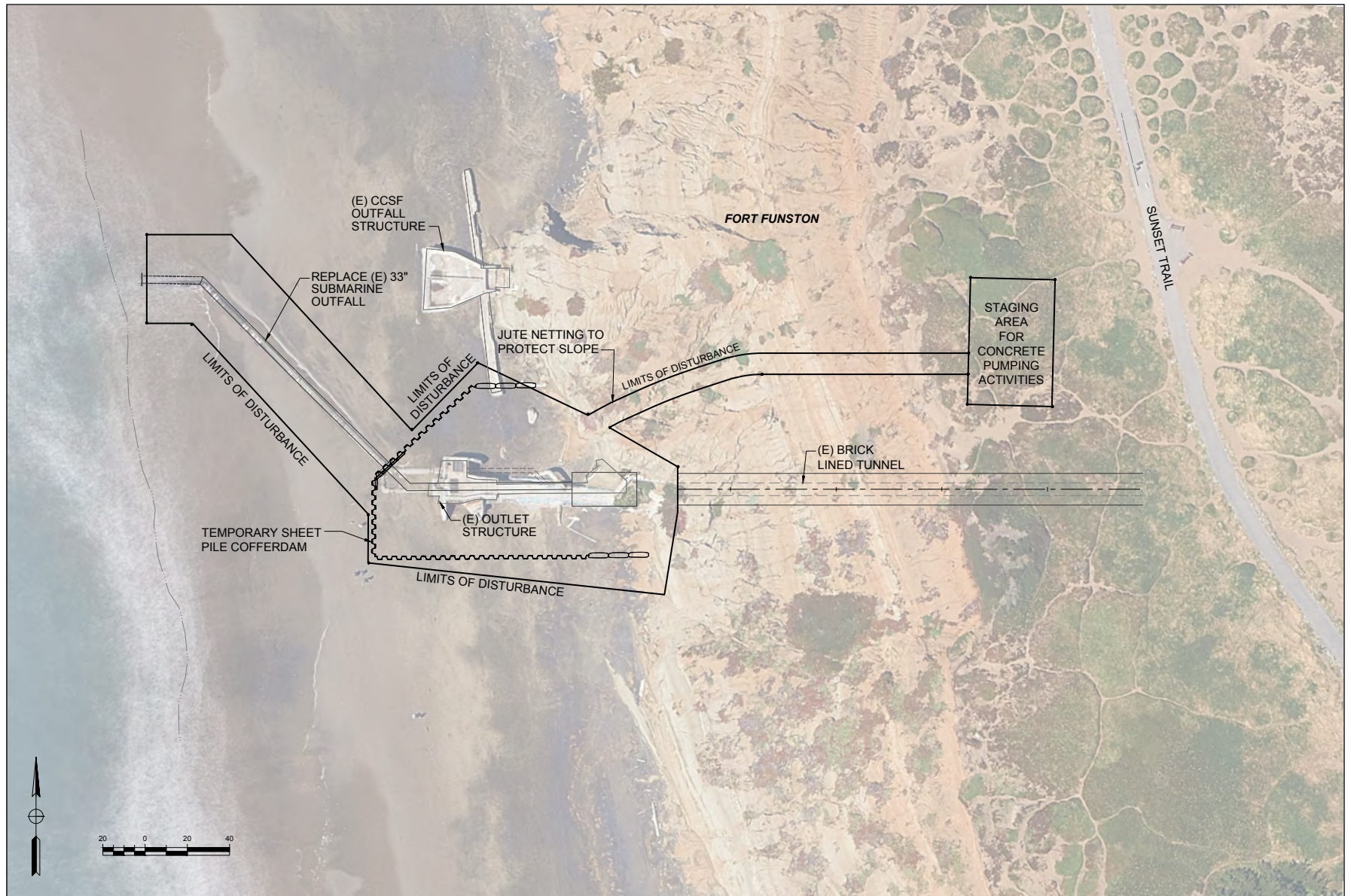
Vista Grande Drainage Basin Improvement Project. 200700036.01

Figure 2-5a
Original Ocean Outlet Construction Area

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The design of the proposed Ocean Outlet structure, including the wing walls, considers the effects of sea level rise on both the operation of the outlet and the rate of cliff erosion. However, the Coastal Commission concluded that the two wing walls were not permissible as part of Project design. Thus, under the Modified Project, the wing walls would be removed from the final design of the Ocean Outlet (see **Figure 2-5b**).

There would also be other small changes to the design elements shown in the EIR/EIS, including additional supports for the anchor outfall pipe. Additionally, the work area for concrete pumping activities and the overall layout of the disturbed area for construction activities at the Ocean Outlet location would move just north of the disturbed area shown in Figure 2-5a (see Figure 2-5b for comparison). Jute netting would be laid on the cliff face to protect it from any disturbance from concrete pumping activities. After the completion of construction at the Ocean Outlet location, excavations would be backfilled and disturbed areas would be regraded with native soils to match existing profiles.



SOURCE: Brown and Caldwell, 2024
 NOTES: CCSF = City and County of
 San Francisco

Vista Grande Drainage Basin Improvement Project. 200700036.01

Figure 2-5b
 Modified Ocean Outlet Design

SECTION 3

Discussion of Impacts

This chapter describes modifications to existing environmental conditions that have occurred in and near the Project area, as well as any changes to environmental impacts due to the Modified Project. Although there have been several modifications to the Project since the certification of the EIR/EIS (see Section 2.2, *Proposed Modifications to the Project*), the overall design and construction details would be similar to those described previously in the certified EIR/EIS. Therefore, this addendum focuses on site-specific resources that may be affected by the Modified Project.

As discussed in Section 3.1.3, *Environmental Topics Removed from Consideration*, of the EIR/EIS, agriculture and forestry resources, mineral resources, and public services were not evaluated because there would be no impacts on these resources from the Project. Under the Modified Project, this would not change, as there would be no major changes to the general area where the Project would occur. The environmental conditions and potential impacts relevant to hazards and hazardous materials, land use and planning, geologic and paleontological resources, transportation and traffic, utilities and service systems, and associated cumulative effects would not change as a result of the Modified Project. This includes minor changes to the design, work and staging areas, access routes, and construction activities because the changes would not affect agriculture and forestry resources or mineral resources, and there would be no changes to land use and planning beyond that described in the EIR/EIS. Additionally, there would be no changes to hazards and hazardous materials, geologic and paleontological resources, or utilities and service systems, given that construction work would generally be the same as previously analyzed. Finally, no changes under the Modified Project would affect transportation and traffic, as the Modified Project would implement a Construction Traffic Management Plan and any other required traffic control measures outlined in Section 3.15, *Transportation and Traffic*, of the EIR/EIS.

The CEQA Guidelines were revised in 2018 to include wildfire as a new environmental topic in its Appendix G. Although an addendum need not consider revisions to the CEQA Guidelines that occur after EIR certification (CEQA Guidelines Section 15007), this addendum notes for informational purposes that the wildfire environmental topic considers whether a project is in or near state responsibility areas or lands classified as very high fire hazard severity zones. If so, it considers whether the Modified Project would include conditions that would exacerbate wildfire risks. The Project site is not located in a state responsibility area and in areas classified as having either a moderate or a very high fire hazard (CAL FIRE 2024). Furthermore, the Modified Project does not include conditions that could exacerbate existing fire risks, such as the creation of slopes or the addition of infrastructure (e.g., roads, power lines, or fuel breaks). Therefore, construction and operation of the Modified Project would not result in a substantial wildfire impact.

The following sections provide analysis of the environmental impacts provided in the EIR/EIS. The impacts have been evaluated to disclose any potential changes that would result from the Modified Project's implementation compared to the certified EIR/EIS and to determine whether these changes would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Based on the analysis provided below, the changes resulting from the Modified Project's implementation would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant effects.

The following discussion reviews revisions to the setting information provided in the EIR/EIS, discloses the findings, and discusses potential resulting changes in environmental impacts for each remaining resource area.

3.1 Aesthetics

3.1.1 Setting

The aesthetics setting described in Section 3.2, *Aesthetics*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing aesthetic conditions within the San Francisco Bay Area (Bay Area) and around Lake Merced, presents the associated regulatory framework, and analyzes potential impacts that would result from the construction and operation of the facilities proposed under the Project.

3.1.2 Findings of the EIR/EIS

The EIR/EIS analysis identified that less-than-significant impacts with mitigation incorporated related to aesthetics would occur.

3.1.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on aesthetics in the Project area. These components include additional staging areas along the Canal, installation of habitat restoration sites around Lake Merced, and the use of additional work areas at the Pacific Rod and Gun Club and Fort Funston.

As described in Section 3.2.1, *Affected Environment*, of the EIR/EIS, the study area for aesthetics includes public areas where the Project elements would be visible. The study area includes the Project site, Lake Merced, Fort Funston, and associated open and recreational spaces in the Project site's vicinity. Lake Merced and adjacent areas are closely bounded by the major thoroughfares of Lake Merced Boulevard, John Muir Drive, and Skyline Boulevard. Aside from golf courses, the Lake Merced area is not highly manicured or landscaped. However, it does not have an untouched natural appearance due to the scattered presence of structures, utilities, roads, and a narrow band of vegetation contained by sidewalks and paths that run alongside the roads surrounding the lake.

The overall Lake Merced area is largely undeveloped, with trees, water, and vegetation providing visual variety and a respite from San Francisco's urban setting. Because many of the surrounding roadways and neighborhoods are elevated relative to Lake Merced, the lake and the bordering open space are important visual resources, offering aesthetically pleasing views for motorists, bicyclists, and pedestrians. A portion of the 49-Mile Scenic Drive, a San Francisco designated scenic road tour, partially encircles the lake. It can be reasonably assumed that users of the pedestrian path, in particular, expect a high-quality environment, given that the streets included in the 49-Mile Scenic Drive are recognized for their aesthetic value. Thus, these pedestrians, motorists, and bicyclists are considered sensitive viewers when considering the potential for aesthetic impacts. Nevertheless, the Project site currently has low viewer exposure and can be seen only briefly as viewers pass by.

As discussed in Section 3.2.5, *Impact Analysis*, of the EIR/EIS, the Project would result in temporary construction-related impacts on the visual character of the Project site and surrounding areas. Direct views of the Project site, including views of construction work areas, would occur from public roadways and public areas in residential neighborhoods and outdoor recreational facilities in the area. Construction activities would occur over a 24- to 44-month period or until completion, as described in Section 2.5.3, *Construction Schedule, Workforce, and Equipment*, of the EIR/EIS.

Under the Modified Project, additional work areas would be at Fort Funston and the Pacific Rod and Gun Club, as well as additional staging areas along the Canal and for the habitat restoration sites. However, there would be no significant changes to the duration of Project construction (24–44 months). The additional Project construction areas would include stockpiling construction materials, storing construction equipment, and temporarily storing construction debris. However, the Modified Project would implement **Mitigation Measure 3.2-1**, which requires the contractor to keep Project areas clean and inconspicuous and requires the prompt removal of debris.

Construction work and staging areas would be restored to conditions similar to existing conditions following the completion of construction activities, except for permanent changes associated with the Modified Project. The Fort Funston work areas, Pacific Rod and Gun Club work area, additional Canal staging areas, and other unpaved staging areas would be revegetated and restored to pre-Project conditions. Because the aesthetic effects of construction activities would be temporary, construction activities would not result in a substantial adverse impact on a scenic vista or resource, or on the visual character of a site or its surroundings. Therefore, the impact would remain less than significant with mitigation incorporated.

The Modified Project would include up to 14 habitat restoration sites, restoring 10 acres of habitat around Lake Merced. The habitat restoration sites would include construction activities, tree removal around Lake Merced (see Figure 2-2), and temporary irrigation. Approximately 804 additional trees would be removed to accommodate the 10 acres of proposed habitat restoration sites; however, the final number would depend on the final design and acreage of the chosen sites. Most trees proposed for removal from the habitat restoration sites are non-native, including blue gum eucalyptus, Monterey pine (*Pinus radiata*), Monterey cypress, and myoporum, among several others in less abundance.

The habitat restoration sites would be planted primarily with arroyo willow and native freshwater marsh plantings at the lower elevations near the banks of Lake Merced. The habitat restoration sites would be designed to reflect and restore the character of the native vegetation communities historically located along the shoreline of Lake Merced. The design character of the habitat restoration sites would integrate the selected areas and associated temporary irrigation infrastructure with the existing visual environment of the Project site. The habitat restoration sites could be considered an aesthetic improvement to the area as they would replace non-native forest with native willow riparian, coastal scrub, and wetland habitat.

The installation of the habitat restoration sites would primarily occur at lower elevations compared to the surrounding roads and the pedestrian path encircling the lake, providing a buffer

to direct views of the habitat restoration sites and construction activities. The habitat restoration sites and associated construction activities would be further screened by existing fencing and vegetation at higher elevations of the lake's banks along some portions of Skyline Boulevard, John Muir Drive, and Lake Merced Boulevard, which are part of San Francisco's 49-Mile Scenic Drive. This fencing and vegetation would be retained after the installation of the habitat restoration sites and would continue to screen direct views of the lake from roads and the pedestrian path encircling the lake, similar to existing conditions. Restoration activities would extend up to the roadway and pedestrian path at some sites along Skyline Boulevard and Lake Merced Boulevard, opening up views of the lake where taller nonnative trees would be removed and replace with willow tree species.

Views of the habitat restoration sites and associated construction activities for installation would be visible from the interior of the lake, including direct views from open water areas and users of public recreational facilities along Harding Road. As mentioned previously, the Modified Project would remove up to 804 trees at the 14 chosen habitat restoration sites and would replace non-native forest with riparian, wetland, and coastal scrub habitat. This would enhance the visual landscape of habitat around Lake Merced by restoring it with historical vegetation communities found along its banks. The habitat restoration sites would replace existing non-native habitat, including species such as blue gum eucalyptus, and would take up to 3 years to fully mature. Once fully established, the habitat restoration sites would add to the existing visual variety of species, both native and non-native, found around Lake Merced. Therefore, the impact on scenic resources would be less than significant.

The Modified Project construction may create a new temporary source of nighttime lighting in the immediate area, and the light and glare effects (including potential effects on nighttime sky viewing) from Project construction could be substantial. Therefore, the impact could be significant. **Mitigation Measure 3.4-9**, described in Section 3.4, *Biological Resources*, would require that nighttime illumination be directed downward, helping to ensure that no significant illumination would pass beyond the work area or vertically into the sky. Light deflectors would be erected between traffic and staging areas. Implementation of **Mitigation Measure 3.4-9** would help ensure that impacts associated with light and glare are reduced to a less-than-significant level. The operation phase of the Modified Project would not create a new source of light or glare, as no lighting is proposed. Therefore, there would be no impact associated with Modified Project operation.

Conclusion

Implementation of **Mitigation Measures 3.2-1** and **3.4-9** included in the EIR/EIS would reduce potentially significant impacts on aesthetic resources to a less-than-significant level. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant with mitigation].)**

3.2 Air Quality

3.2.1 Setting

The air quality setting from Section 3.3, *Air Quality*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing air quality conditions within the San Francisco Bay Area Air Basin area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.2.2 Findings of the EIR/EIS

The EIR/EIS identified the potential for less-than-significant impacts with mitigation included related to air quality.

3.2.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on air quality in the Project area. These components include the use of diesel generators to power construction activities, as well as construction activities, including site preparation and ground disturbance in closer proximity to sensitive receptors. This would include the use of additional work and staging areas, the installation of an access ramp near the Canal, the installation of habitat restoration sites around Lake Merced, and the use of the Pacific Rod and Gun Club work area.

As described in Section 3.3.5, *Impact Analysis*, of the EIR/EIS, most Project-related exhaust emissions would be generated on-site due to the use of the heavy-duty off-road equipment. Exhaust emissions would also be generated by heavy-duty diesel material haul trucks, concrete vendor trucks, and, to a lesser extent, construction worker daily commute trips. Criteria pollutant exhaust emissions of reactive organic gases (ROG), oxides of nitrogen (NO_x), particulate matter 10 micrometers or less in diameter (PM₁₀), and particulate matter 2.5 micrometers or less in diameter (PM_{2.5}) from construction equipment and vehicles would incrementally add to the regional atmospheric loading of these pollutants during Project construction. Impacts related to violating an air quality standard or contributing to an existing or projected air quality violation were assessed by comparing estimated direct and indirect Project exhaust emissions to the significance thresholds, which are average daily emissions of 54 pounds per day (lb/day) for ROG, NO_x, and PM_{2.5}, and 82 lb/day for PM₁₀.

Project-related construction criteria for pollutant exhaust emissions discussed in the EIR/EIS are outlined in **Table 3-1**.

Under the Modified Project, the use of seven generators ranging from 80 to 100 hp would generate an additional 6 lb/day of NO_x during the first 6 months and 8 lb/day during the following 12 months, raising daily NO_x emissions up to 40.2 lb/day. However, this would be below the Bay Area Air Quality Management District's (BAAQMD's) NO_x emission threshold of 54 lb/day. The

use of diesel generators would also increase the PM₁₀ emissions by 50 percent, but this would still be below the BAAQMD threshold of 82 lb/day. Using diesel generators for construction activities would be temporary, lasting 18 months. Additionally, if generators are stationary, Daly City would be required to obtain a BAAQMD permit and comply with any BMPs identified.

**TABLE 3-1
CONSTRUCTION CRITERIA POLLUTANT EXHAUST EMISSIONS**

Emission Source	Average Daily Construction Emissions (pounds/day)			
	ROG	NOx	PM ₁₀	PM _{2.5}
Construction Activities	4.9	20.0	0.9	0.9
Vehicle Trips	0.7	12.3	0.3	0.2
Average Daily (pounds/day)	5.6	32.2	1.2	1.2
BAAQMD Significance Threshold	54	54	82	54
Significant Impact?	No	No	No	No

NOTES:

BAAQMD = Bay Area Air Quality Management District; EIR/EIS = Environmental Impact Report/Environmental Impact Statement; EMFAC = Emission FACTors model; NOx = oxides of nitrogen; PM_{2.5} = particulate matter 2.5 micrometers or less in diameter; PM₁₀ = particulate matter 10 micrometers or less in diameter; ROG = reactive organic gases.

Emissions were estimated using emission factors from the off-road emissions inventory database and EMFAC 2011. Numbers may not sum due to rounding. See Appendix C of the EIR/EIS for details on the emissions estimates.

SOURCE: ESA 2017

In addition to exhaust emissions, the Modified Project construction activities would generate fugitive dust emissions associated with site preparation, earth disturbance, travel on paved and unpaved roads, and other dust-generating activities. With regard to fugitive dust emissions, BAAQMD recommends that lead agencies focus on implementing dust control measures to help ensure that impacts would be less than significant, rather than comparing estimated levels of fugitive dust to quantitative significance thresholds.

For all areas of the Modified Project construction within the city and county of San Francisco, Daly City would be required to comply with San Francisco's construction Dust Ordinance by submitting a Dust Control Plan to the San Francisco Department of Public Health for approval. The site-specific Dust Control Plan would require Daly City to do the following:

- Water active construction areas sufficiently to prevent dust from becoming airborne.
- Provide as much water as necessary to control dust without creating runoff in disturbed areas.
- Wet-sweep or vacuum streets, sidewalks, paths, and intersections where work is in progress at the end of the workday.
- Cover inactive stockpiles greater than 10 cubic yards or 500 square feet of material.
- Use dust enclosures, curtains, and dust collectors as necessary to control dust in the excavation area.

Daly City also requires that a grading permit applicant submit a Dust Nuisance Control Plan for review and approval. This plan must include both dust suppression through watering or other

techniques and daily sweeping of public streets and sidewalks. Similar to San Francisco requirements, this plan would also represent BMPs identified by BAAQMD for controlling fugitive dust. The Modified Project would also implement **Mitigation Measure 3.3-1** to prepare and implement a Dust Control Plan for construction activities at Fort Funston, which is a federally administered area.

Short-term construction exhaust emissions associated with the Modified Project would not exceed the significance thresholds for ozone precursors or particulate matter. Compliance with the San Francisco Construction Dust Ordinance, Daly City's grading permit Dust Nuisance Control Plan requirements, and **Mitigation Measure 3.3-1** would help ensure that impacts associated with fugitive dust emissions would continue to be less than significant.

Additionally, the BAAQMD recommends that lead agencies assess the incremental risk of toxic air contaminant (TAC) exposure for all sensitive receptors within a 1,000-foot radius of a Project's fence line. Although long-term Project operation would result in no new TAC emissions, construction activities associated with the Modified Project would generate diesel particulate matter (DPM), a TAC. Most DPM exhaust emissions generated during construction would be because of diesel off-road equipment and diesel generators.

The closest sensitive receptors to the Modified Project would be the Lakewood Apartments along the south side of John Muir Drive and north of the Vista Grande Tunnel's east portal. These apartments are located 200 feet from the Pacific Rod and Gun Club work area, 300 feet from the Lake Merced Portal, 300 feet or more from additional Canal components, and 600 feet from the modified work area within Fort Funston. Additional sensitive receptors are near habitat restoration sites, such as Lowell High School and the Lakeshore neighborhood, located at various distances within the 1,000-foot buffer. None of the Modified Project elements or nearby sensitive receptors are located within an Air Pollution Exposure Zone, as designated by the San Francisco Health Department.

As discussed in the EIR/EIS, off-road equipment is a large contributor to DPM emissions in California. However, since 2007, the California Air Resources Board has found that the emissions were substantially lower than previously expected (CARB 2010). Additionally, federal and state regulations require cleaner off-road equipment. Specifically, both the U.S. Environmental Protection Agency and the State of California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Although the full benefits of these regulations will not be realized for several more years, the U.S. Environmental Protection Agency estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent (EPA 2004).

Furthermore, as a major construction Project¹ within the jurisdiction of the city and county of San Francisco and within 1,000 feet of sensitive receptors, construction work would be subject to the conditions of the City and County of San Francisco's Clean Construction Ordinance, updated in

¹ A *major construction project* is defined as a public work to be performed within the geographic limits of the city that uses off-road equipment and is estimated to require 20 or more cumulative days of work, including non-consecutive days, to complete.

March 2015. The Clean Construction Ordinance requires that such construction projects use only off-road equipment and off-road engines fueled by biodiesel fuel grade (B20). Additionally, the off-road equipment must either meet or exceed Tier 2 standards for off-road engines or operate with the most effective Verified Diesel Emission Control Strategies.

Additionally, due to their temporary and variable nature, construction activities are not suitable for assessing long-term health risks. The BAAQMD's CEQA Air Quality Guidelines (BAAQMD 2022) states the following:

Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB, 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.

Therefore, Project-level analyses of construction activities tend to produce overestimated assessments of long-term health risks. However, within Air Pollutant Exposure Zones, additional construction activity may negatively affect populations already at a higher risk for adverse long-term health risks from existing air pollution sources. The Modified Project site is not located within any identified Air Pollutant Exposure Zones.

For the Modified Project, additional DPM emissions generated would be limited to 18 months in the Tunnel portals' vicinity where the diesel generators would be in use, and 17–37 months in the Pacific Rod and Gun Club work area's vicinity and in the additional Canal components' vicinity (i.e., staging areas, access ramp, water recirculation pump). Additional DPM emissions would be in the habitat restoration sites' vicinity around Lake Merced for approximately 5 months. All other Modified Project components would be located more than 1,000 feet from sensitive receptors.

Although diesel generators, off-road equipment, and on-road heavy-duty diesel vehicles on designated truck routes would be used during these months of construction, emissions would be temporary and variable and would not be expected to expose sensitive receptors to substantial air pollutants outside Air Pollutant Exposure Zones. Furthermore, the Modified Project would be subject to, and would comply with, California regulations limiting idling to no more than 5 minutes, further reducing exposure of nearby sensitive receptors to temporary and variable DPM emissions. Therefore, the impact would remain less than significant.

Diesel equipment used to construct the Modified Project may emit objectionable odors associated with diesel fuel combustion. However, these emissions would be temporary and intermittent. Therefore, odor impacts associated with diesel combustion during construction activities would remain less than significant.

Conclusion

Implementation of **Mitigation Measure 3.3-1**, as included in the EIR/EIS, would reduce potentially significant impacts on air quality in the Project area to a less-than-significant level. Additionally, the Modified Project would obtain any necessary permits with the City and County of San Francisco, Daly City, or the BAAQMD, and would implement any necessary dust control plans and BMPs as part of those permits. Furthermore, construction activities associated with the Modified Project would be temporary, lasting between 24 and 44 months, as discussed in the EIR/EIS. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant with mitigation].)**

3.3 Biological Resources

3.3.1 Setting

The sensitive and regulated vegetation communities, habitat types, and plant and animal species described in Section 3.4, *Biological Resources*, of the EIR/EIS remain applicable to the Modified Project. The biological resources in the additional work and staging areas are generally consistent with those described in the EIR/EIS. As discussed in Appendix A of the Lake Merced West Project EIR (SF Planning 2022), the land uses in the Pacific Rod and Gun Club site's vicinity include parks, golf courses, and urban residential and commercial development. Urban development is primarily concentrated on the south side of John Muir Drive and the east side of Lake Merced Boulevard. Although the site is located within a densely developed area of San Francisco, there has been limited human interference on-site since remediation activities in 2016. After completion of remediation activities, the site's vegetation was restored and it continues to be routinely monitored for performance by qualified biologists. Several diverse vegetation communities and habitat types, including perennial grassland, mixed coastal scrub and woodland, arroyo willow riparian scrub, freshwater marsh, and lacustrine, provide refuge for local wildlife among the largely developed upland areas bordering the Lake Merced system.

3.3.2 Findings of the EIR/EIS

The EIR/EIS identified the potential for less-than-significant impacts with mitigation incorporated related to biological resources.

3.3.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on biological resources in the Project area. Additional impacts would primarily be from the restoration and enhancement of habitat restoration sites around Lake Merced, which would require vegetation and tree removal. Other components of the Modified Project may also potentially cause additional impacts on biological resources through vegetation removal and ground disturbance, such as the installation of the water recirculation pump, use of the Pacific Rod and Gun Club work area, use of additional staging areas, and the installation of an access ramp along the Canal.

As described in Section 3.4.5, *Impact Analysis*, of the EIR/EIS, Project construction could have a substantial adverse effect either directly or through habitat modifications on plant and animal species identified as sensitive or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Under the Modified Project, construction activities would occur in several areas around Lake Merced and Fort Funston that were not previously considered in the EIR/EIS. These activities would include site preparation, vegetation and tree removal, ground disturbance activities, and temporary irrigation. Increased construction activity, which can cause stress or abandonment of nests and roosts, loss or conversion of habitat, or direct mortality, would be considered significant impacts.

As discussed in the EIR/EIS, these could include impacts on special-status and protected plant, reptile, bird, and bat species, as well as sensitive natural communities (e.g., coastal dune scrub). The Modified Project would be required to implement **Mitigation Measures 3.4-1** through **3.4-5** to reduce impacts on special-status and otherwise protected plant and animal species and sensitive natural communities to less-than-significant levels. Specifically, the Modified Project would implement the following measures:

Mitigation Measure 3.4-1: Requires avoidance, minimization, and compensation for impacts on special-status plants.

Mitigation Measure 3.4-2a: Requires construction worker environmental awareness program training.

Mitigation Measure 3.4-2b: Requires avoidance and minimization measures for western pond turtle.

Mitigation Measure 3.4-3: Includes measures to protect nesting birds, addressing potential impacts even though the Modified Project does not include known rookery habitat.

Mitigation Measure 3.4-4: Requires avoidance and minimization measures for special-status bats.

Mitigation Measure 3.4-5: Requires avoidance, minimization, and compensation for impacts on central dune scrub.

No special-status fish species occur within Lake Merced waters; however, western pond turtles reside in the lake and could be adversely affected by in-water work associated with the Modified Project, including activities required for the construction of components, such as the proposed water recirculation pump. Implementation of **Mitigation Measure 3.4-2b** would reduce potential impacts on the western pond turtle to a less-than-significant level by requiring the installation of terrestrial exclusion fencing around these lakeside construction areas, the installation of a cofferdam around isolated in-water work areas, the completion of preconstruction surveys, and implementation of additional measures during site construction.

Additionally, as discussed in the EIR/EIS, Project construction would have a substantial adverse effect on upland vegetation communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Project construction could affect sensitive communities through the introduction or spread of invasive plants and could have a substantial adverse effect on wetlands and other jurisdictional waters. Under the Modified Project, as discussed throughout Section 2.2, *Proposed Modifications to the Project*, additional construction activities would be required throughout Lake Merced, Fort Funston, and the surrounding areas. These construction activities would include additional work areas, staging areas, and components that would require additional vegetation and tree removal, site preparation, ground-disturbing activities, and temporary irrigation; additional site disturbance could introduce invasive species.

The Modified Project would be required to implement **Mitigation Measures 3.4-6** through **3.4-8b** to reduce impacts on upland areas and wetlands and impacts associated with the spread of invasive

species. As discussed in EIR/EIS Impact 3.4-6, damage or removal of protected trees in areas under San Francisco Department of Public Works (SFDPW) jurisdiction is subject to a SFDPW permit. However, none of the Modified Project areas, or trees that would be damaged or removed, are under SFDPW jurisdiction. It is also noted that the restored willow riparian habitat at Lake Merced would replace non-native trees with native tree species. The Modified Project would implement the following measures:

Mitigation Measure 3.4-6: Requires Daly City to implement tree protection measures that require identification of trees to be removed, trimmed, or retained, and procedures for tree protections during construction.

Mitigation Measure 3.4-7a: Requires control measures to reduce the spread of invasive species.

Mitigation Measure 3.4-7b: Requires post-construction treatment of upland areas disturbed by construction activities.

Mitigation Measure 3.4-8a: Calls for wetland protection and avoidance.

Mitigation Measure 3.4-8b: Requires compensation for any impacts on wetlands or riparian habitat.

The Modified Project construction could also interfere substantially with the movement of native resident or migratory species, disrupt established native resident or migratory corridors, or impede the use of nursery sites. This interference would result primarily from the use of nighttime lighting, which may be required for additional construction activities. To mitigate these impacts, the Modified Project would implement **Mitigation Measure 3.4-9**, which would require minimizing nighttime lighting where feasible and calls for measures to reduce impacts when nighttime lighting cannot be avoided.

Additional impacts on biological resources could occur from lake level changes due to the Project's operation. To address these impacts, the Modified Project would be required to implement **Mitigation Measures 3.4-10a** and **3.4-10b**, which would reduce impacts from the Modified Project's operation to less-than-significant levels. These measures would manage water levels to reduce Project-related losses of sensitive communities or provide compensatory mitigation if such losses cannot be avoided.

The proposed habitat restoration sites would remove existing non-native forest habitat, including 804 trees, and restore native arroyo willow riparian and freshwater marsh habitat along the Lake Merced shoreline (above the Modified Project's operational WSE). The trees proposed for removal from the habitat restoration sites are primarily non-native species, such as blue gum eucalyptus, myoporum, Monterey cypress, and blackwood acacia, with other species in less abundance. The habitat restoration sites would be replanted mostly with native willow riparian habitat along the Lake Merced shoreline, freshwater marsh (wetland) plants, and coastal scrub habitat. After planting, the willow riparian and coastal scrub habitats would be seeded with a native seed mix of herbaceous understory species.

Since publication of the EIR/EIS, the U.S. Fish and Wildlife Service proposed listing the monarch butterfly (*Danaus plexippus*) as threatened under the federal Endangered Species Act (USFWS 2024). The western monarch butterfly population migrates from interior breeding areas to the coast in October and November to overwinter until March when they return to breeding areas for spring and summer. Overwintering monarchs aggregate in tree groves typically located within 1.5 miles of the coastline where specific microclimate conditions of high humidity, low winds, mixed sunlight, protection from freezing temperatures, and access to freshwater are present. Monarchs most commonly roost in stands of blue gum eucalyptus trees but also use Monterey pine and Monterey cypress trees (Xerces Society et al. 2025).

A monarch butterfly overwintering site has been documented and tracked by the Xerces Society for Invertebrate Conservation (Xerces Society) since 2008 within the non-native forest at Stern Grove and Pine Lake in San Francisco, located 0.5 mile north of Lake Merced. Four other known overwintering sites in San Francisco are identified within tree stands at 26th Avenue and Fulton Street in Golden Gate Park, Rob Hill in the Presidio, Fort Mason near Building 201, and Telegraph Hill in North Beach. Several other potential overwintering sites being tracked by the Xerces Society are located in Golden Gate Park, Lovers Bridge in the Presidio, and McClaren Park (Xerces Society 2017).

Non-native forest habitat around Lake Merced contains similar tree species composition to the other known or potential sites identified in San Francisco but has not been identified by the Xerces Society as containing known or potential overwintering sites. Through development of the habitat restoration sites, the Modified Project would remove approximately 1.44 acres of non-native forest habitat from around the lake, 31 percent of the total non-native forest habitat (4.62 acres) surrounding the greater Lake Merced system (ESA 2024). Environmental Science Associates conducted surveys to identify monarch use of non-native forest habitat within the habitat restoration sites during the 2024–2025 overwintering season in February 2025, following the Xerces Society’s Western Monarch Habitat Assessment Survey protocol (Xerces Society 2024). Biologists experienced in conducting these protocol-level surveys for overwintering monarch populations performed pedestrian surveys of the habitat restoration sites using binoculars to scan tree stands for roosting monarch butterflies. During the surveys, biologists also visited Stern Grove, where roosting aggregates are known to be present. No overwintering monarch roosts were identified during the surveys within the habitat restoration sites (ESA 2025).

Because overwintering roosts are returned to year after year, areas that do not contain suitable conditions are expected to remain absent of monarch butterflies (James 2024). Therefore, it is expected that the trees identified for removal within the habitat restoration sites would not contain overwintering roosts when construction at these locations commences in late summer to fall 2025. Furthermore, tree removal activities that would affect non-native forest habitat within the habitat restoration sites would begin in August or September 2025, preceding the arrival of monarchs to overwintering sites in October and November. Additionally, ongoing disturbance to this habitat type within the mitigation sites throughout October, November, and December would deter monarchs from establishing overwintering roosts in the Lake Merced area, making direct impacts on active overwintering populations from tree removal under the Modified Project unlikely. Because overwintering roosts have not been previously documented in any non-native forest

habitat at Lake Merced, combined with the likely ongoing construction disturbance of the mitigation sites during the arrival period for migrating monarchs, the Modified Project's impact on the proposed threatened monarch butterfly associated with the removal of potential overwintering habitat would be less than significant.

After completion of the Modified Project, work and staging areas would be restored to pre-Project conditions or similar. Most areas would be revegetated with native species associated with freshwater marsh, willow riparian, coastal scrub, or dune species, as appropriate and consistent with surrounding vegetation. With implementation of **Mitigation Measures 3.4-1** through **3.4-10b** and the installation of the proposed habitat restoration sites, impacts on special-status species and lake sensitive habitat would be reduced to less-than-significant levels. This would be similar to other Project areas considered in the EIR/EIS. Therefore, impacts would be consistent with the EIR/EIS and would remain less than significant with mitigation incorporated.

Conclusion

Implementation of **Mitigation Measures 3.4-1** through **3.4-10b** included in the EIR/EIS would reduce any potentially significant impacts, including those on vegetation communities and wildlife habitat, supported special-status plant and animal species, wetlands, and impacts related to potential conflicts with local and regional conservation plans or ordinances protecting biological resources to less-than-significant levels. Impacts on established native resident or migratory wildlife corridors would remain less than significant. The Modified Project would not result in any new or substantially more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant with mitigation].)**

3.4 Cultural Resources

3.4.1 Setting

The regional setting and regulatory framework related to cultural and paleontological resources described in Section 3.5, *Cultural Resources*, of the EIR/EIS have not changed and remain applicable to the Modified Project.

The Pacific Rod and Gun Club site has been identified as a historic resource, meeting Criterion 1 of the California Register of Historical Resources for its association with historic events, as detailed in the Lake Merced West Project EIR (SF Planning 2022). The site is significant as an example of the type of sportsmen's gun club that formed in the 1920s and 1930s, reflecting the democratization of hunting and illustrating the social experience connected with the conservation movement. Additionally, the site is notable as the oldest extant skeet facility in the Bay Area and as the only sportsmen's club in the Bay Area to retain its original pre–World War II grounds configuration, skeet field structures, and club buildings.

3.4.2 Findings of the EIR/EIS

The EIR/EIS identified three archeological and architectural resources: the 1882 schooner *Neptune* shipwreck, the Canal, and Fort Funston. No Native American cultural resources or human remains were identified within the Project site in the EIR/EIS. The EIR/EIS determined that there would be significant and unavoidable impacts on the Tunnel and Canal, both of which are eligible for listing in the National Register of Historic Places, and required mitigation measures to reduce impacts to the extent feasible. All or most of the Tunnel and Canal would be affected because the Project would update and modernize the aging structures. All other impacts were determined to have less-than-significant impacts with mitigation incorporated.

3.4.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on cultural resources in the Project area through ground-disturbing activities, including the addition of the Pacific Rod and Gun Club work area, modifications to Canal components, and the installation of the water recirculation pump and habitat restoration sites around Lake Merced.

As described in Section 3.5.5, *Impact Analysis*, of the EIR/EIS, the Project would have an impact on archaeological resources if it would cause a substantial adverse change to a significant archaeological resource, including those that qualify as historical resources according to CEQA Guidelines Section 15064.5, unique archaeological resources as defined in CEQA Section 21083.2(g), and historic properties that meet the National Register of Historic Places listing criteria in Code of Federal Regulations Title 36, Section 60.4.

The Modified Project would include construction activities in areas not discussed in the EIR/EIS, such as the Pacific Rod and Gun Club work area or areas covered under the EIR/EIS that were

not expected to be disturbed. The EIR/EIS found that, while the scenario is unlikely, ground-disturbing activities could expose and cause impacts on unknown archaeological resources or shipwrecks, which would be a potentially significant impact. Similarly, while the scenario is unlikely, there is still the potential for the Modified Project to cause a substantial adverse change in the significance of an archaeological resource.

The Modified Project would also implement **Mitigation Measure 3.5-3**, which requires construction activities to halt if archaeological resources are identified. This measure would allow a qualified archaeologist, or NPS archaeological resources staff if located on federally administered lands, to inspect the find and provide additional recommendations as necessary, with the goal of avoiding, minimizing, or mitigating adverse effects.

Furthermore, no known human burial locations have been identified in the Project area; however, the possibility cannot be entirely discounted. The Modified Project could result in direct impacts on previously undiscovered human remains during earthmoving activities. Impacts on human remains would be potentially significant but could be reduced to a less-than-significant level with the implementation of **Mitigation Measure 3.5-4**, which requires that all work halt in the find's vicinity and that the County Coroner be contacted.

Therefore, the Modified Project would have a less-than-significant impact relative to cultural resources, and substantial physical deterioration of known or undiscovered resources would not occur.

Conclusion

Implementation of **Mitigation Measures 3.5-3 and 3.5-4** included in the EIR/EIS would reduce potentially significant impacts on previously undiscovered cultural resources or human remains to a less-than-significant level. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [significant and unavoidable].)**

3.5 Geology and Soils

3.5.1 Setting

Although part of the Modified Project site would include locations not analyzed in the EIR/EIS, the regional setting and regulatory framework related to geology and soils described in Section 3.6, *Geology and Soils*, of the EIR/EIS have not changed and remain applicable to the Modified Project.

3.5.2 Findings of the EIR/EIS

The EIR/EIS analysis identified less-than-significant impacts with mitigation incorporated related to geology and soils.

3.5.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on geology and soils in the Project area, including the addition of the Pacific Rod and Gun Club work area, modifications to the Fort Funston work area, additional Canal components, and the installation of the water recirculation pump and habitat restoration sites around Lake Merced.

As described in Section 3.6, *Geology and Soils*, of the EIR/EIS, the Project is located in an area susceptible to fault rupture, ground shaking, and seismic-related ground failure. The use of the Pacific Rod and Gun club work area was not discussed in the EIR/EIS. Additionally, sites along the Canal, which were part of the overall Project footprint but were not likely to be disturbed, would be used as a staging area for work on the Canal. The Modified Project would be required to implement **Mitigation Measure 3.6-1a**, which requires that the Project be designed, engineered, and constructed in conformance with engineering practices and geotechnical recommendations to minimize potential structural damage during a seismic event. The Modified Project would also implement **Mitigation Measure 3.6-1b**, which requires inspectors working under the auspices of a California-licensed geotechnical engineer to be present on the Project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in this measure. Therefore, the Modified Project would have less-than-significant impacts related to strong seismic ground shaking and/or seismic-related ground failure.

Additionally, construction activities, such as excavating, trenching, and grading, can remove stabilizing vegetation and expose areas of loose soil that, if not properly stabilized during construction, can be subject to erosion by wind and stormwater runoff, potentially resulting in a significant soils impact. The Modified Project would include components that could potentially increase soil erosion through ground disturbance or vegetation removal. The Modified Project would be subject to the requirements of the National Pollutant Discharge Elimination System Construction General Permit, which includes mandatory implementation of BMPs concerning erosion control. The Project would also implement **Mitigation Measure 3.6-2**, which would require inspections of subdrain pipes to monitor water flows and buildup of sediment from

erosion. Compliance with the Construction General Permit, including the implementation of a Stormwater Pollution Prevention Plan, associated BMPs, and mitigation measures, would help ensure that the potential impact of soil erosion or the loss of topsoil from the Modified Project would be less than significant.

Furthermore, natural or constructed slopes could become destabilized during construction-related excavation or grading operations if located on problematic soils. Excavations for components could result in slope instability, potentially triggering slope failures that could result in landslides, slumps, soil creep, or debris flows. Additionally, there is the potential for geologic hazards at the Ocean Outlet along the Fort Funston bluffs. However, the Modified Project would be required to implement **Mitigation Measures 3.6-3a** and **3.6-3b**, which would reduce the impacts associated with landsliding to less-than-significant levels. These measures include adherence to the construction specifications outlined in the geotechnical report, which include measures to reduce effects related to slope instability, landsliding, and lateral earth pressure, as well as additional slope studies before final Project design.

Conclusion

Implementation of **Mitigation Measures 3.6-1a** through **3.6-3b** included in the EIR/EIS would reduce potentially significant impacts related to geology and soils to less-than-significant levels. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant with mitigation].)**

3.6 Greenhouse Gas Emissions and Climate Change

3.6.1 Setting

The greenhouse gas (GHG) emissions and climate change setting described in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, of the EIR/EIS remain applicable to the Modified Project. The section provides an overview of existing GHG and climate change conditions within the San Francisco Bay Area Air Basin area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.6.2 Findings of the EIR/EIS

The EIR/EIS analysis identified that there would be no conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The EIR/EIS analysis determined that less-than-significant impacts with mitigation incorporated related to GHGs and climate change would occur as part of the Project.

3.6.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on GHG emissions in the Project area, primarily due to the use of diesel generators. However, other components of the Modified Project may also produce an incremental change in GHG emissions.

Construction activities associated with the Modified Project (e.g., installing a water recirculation pump, installing habitat restoration sites), excluding the use of diesel generators, would be the same as construction activities described in the EIR/EIS, just at different locations. These activities would result in a negligible net change in long-term baseline conditions and GHG emissions. Therefore, the impacts from these modifications are not discussed further.

As described in Section 3.7.5, *Impact Analysis*, of the EIR/EIS, Project construction would occur over 24–44 months. Most of the Project-related GHG emissions would be generated off-site from construction worker vehicle trips to and from the site and from heavy-duty haul trucks transporting soil, gravel, and debris. Off-road construction vehicle use, including the use of a crane and excavators, would also contribute to construction GHG emissions.

The BAAQMD's Revised Draft Options and Justification Report (BAAQMD 2009) identifies qualitative and quantitative operations-related thresholds of significance for GHG emissions. For projects other than stationary sources, the qualitative threshold is noncompliance with a qualified climate action plan or qualified general plan. The quantitative threshold is annual operational emissions exceeding 1,100 metric tons of carbon dioxide equivalent (CO₂e). For stationary-source projects, the quantitative threshold is 10,000 metric tons of CO₂e per year. No threshold has been established for GHG emissions generated during construction. In the absence of such thresholds, this analysis applies the BAAQMD's threshold of 1,100 metric tons of CO₂e per year

for non-stationary-source projects. However, the Project would not involve installing a stationary source requiring a BAAQMD permit.

Estimated Project construction GHG emissions are presented in **Table 3-2**.

TABLE 3-2
ESTIMATED PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

Construction Activity Source	Year 1	Year 2	Year 3
Off-road Equipment Emissions	192.4	1,575.8	393.7
Vehicle Emissions	700.7	622.4	41.9
Total Construction Emissions	893.1	2,198.2	435.6
Significance Threshold	1,100.0	1,100.0	1,100.0
Significant Impact?	No	Yes	No
SOURCE: ESA 2017			

As indicated in Table 3-2, total short-term Project construction-related GHG emissions would be below BAAQMD's quantitative threshold of 1,100 metric tons of CO₂e per year for non-stationary sources in construction years 1 and 3 but would be above this threshold during year 2. Therefore, GHG emissions from Project construction are considered significant during year 2.

As discussed in Section 2.2, *Proposed Modifications to the Project*, the Modified Project would include the use of diesel generators for construction activities associated with the Tunnel. These generators would be used 24 hours a day, 5 days a week, with demand decreasing by 25 percent after the first 6 months of use, for year 2 of construction. One generator would be located at the Fort Funston work area and the other at the Tunnel's east portal; both would be used to power components related to the Tunnel phase of the Project. Although the addition of the diesel generators would increase GHG emissions, the Modified Project would remain below the federal threshold of 25,000 metric tons of CO₂e for adverse environmental impacts from construction-related GHG emissions. However, GHG emissions would still be above the BAAQMD's threshold of 1,100 metric tons per year. Therefore, this impact would still be considered significant for year 2 of construction activities.

Therefore, the Modified Project would be required to implement **Mitigation Measure 3.7-1**, which requires Daly City and its contractors to implement several measures to reduce GHG emissions. The mitigation measure would include limiting idling, requiring the use of B20 biodiesel (which would reduce GHG emissions from generator operation by 20 percent), and requiring Daly City to purchase carbon offsets for any GHG emissions over the 1,100 metric ton per year threshold.

Conclusion

Implementation of **Mitigation Measure 3.7-1** included in the EIR/EIS would reduce potentially significant impacts from construction and operation to less-than-significant levels. The Modified Project would not result in any new or more severe significant impacts than those identified in the

certified EIR/EIS. (Same impact as previously approved project [less than significant with mitigation].)

3.7 Hydrology and Water Quality

3.7.1 Setting

The hydrology and water quality setting described in Section 3.9, *Hydrology and Water Quality*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing hydrology and water quality conditions within the Bay Area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.7.2 Findings of the EIR/EIS

The EIR/EIS analysis identified significant and unavoidable impacts related to the alteration of coastal landforms. The Project could have substantial adverse effects on local shoreline sand supply, shoreline processes, and localized rates of erosion, and would continue to prevent the bluffs and shoreline from eroding naturally. All other impacts were determined to be less than significant with mitigation incorporated.

3.7.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on hydrology and water quality in the Project area, including the addition of the Pacific Rod and Gun Club work area, modifications to the Fort Funston work area, the Ocean Outlet design, the Canal components, and the installation of the water recirculation pump and habitat restoration sites around Lake Merced.

These potential impacts would arise from additional construction activities around Lake Merced, such as the use of a cofferdam and dewatering for the installation of the water recirculation pump, vegetation removal and planting for the habitat restoration sites, and the addition of staging areas along the Canal and work areas at the Pacific Rod and Gun Club near the bank of Lake Merced. The Modified Project would also include an additional work area in the Fort Funston parking lot and the removal of wing walls from the Ocean Outlet design; these components would be near Funston Beach and the Pacific Ocean and could potentially affect coastal waters and resources.

As mentioned previously, the Modified Project would include additional staging and work areas around Lake Merced and Fort Funston, soil-disturbing activities, and vegetation removal activities required for the installation of the water recirculation pump and the habitat restoration areas. As a discharger, Daly City must comply with the requirements of Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, otherwise referred to as the “Construction General Permit.” This would require the implementation of a stormwater pollution prevention plan and BMPs to control Project-related runoff. As discussed in the EIR/EIS, the stormwater pollution prevention plan must be designed to address the following objectives:

- All pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled.
- Where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated.
- Site BMPs are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity to the applicable defined standard.
- Calculations and design details as well as BMP controls for site run-on are complete and correct.
- Stabilization BMPs are implemented to reduce or eliminate pollutants after construction is completed.

In addition to the requirements of the Construction General Permit, the Modified Project components constructed in the Canal construction area, served by the SFPUC separate storm sewer system, would be subject to compliance with the SFPUC Stormwater Management Plan's measures to minimize stormwater pollution in areas of San Francisco served by separate storm sewer systems. Additionally, in accordance with Article 4.1 of the San Francisco Public Works Code and consistent with SFPUC's Water Pollution Prevention Program, Daly City would be required to develop and implement an Erosion and Sediment Control Plan specifying measures to prevent stormwater pollution and control runoff at each applicable site.

With the implementation of the measures required by the Construction General Permit, the development and implementation of a Stormwater Management Plan and Erosion and Sediment Control Plan, and the restoration of disturbed areas to pre-Project conditions after completion of construction activities, potential impacts of the Modified Project related to increased erosion and stormwater runoff would remain less than significant and temporary.

As discussed previously, the Modified Project would require dewatering activities for the installation of the water recirculation pump. It is not likely that dewatering would generate contaminated water that would require special handling or disposal; however, the contractor would have the necessary facilities (portable water treatment units located in the staging areas) to collect, handle, and treat flows that may be contaminated with cementitious products, silts and sediments, oil and grease from equipment, and other potential contaminants. Discharge water quality would be tested and maintained in accordance with dewatering discharge permit requirements. All Project-related dewatering discharges would be performed in accordance with regulatory requirements, and any necessary permits would be obtained. Therefore, impacts of the Modified Project related to violating water quality standards or degrading water quality due to groundwater discharges during construction dewatering would be less than significant.

Waters isolated within cofferdam areas have a high potential to contain high concentrations of sediment as a result of the level of ground disturbance within the isolated work area. The direct discharge of such waters from the cofferdam areas to Lake Merced could result in localized increases in suspended sediment and turbidity that could persist for the duration of dewatering activities. If the water from the isolated work areas were discharged directly to Lake Merced,

these discharges could violate water quality standards or substantially degrade water quality, resulting in a potentially significant water quality impact. As discussed previously, the Modified Project would include the use of a cofferdam to install the water recirculation pump. However, **Mitigation Measure 3.9-1** would reduce this potential impact on water quality to a less-than-significant level by requiring the implementation of standard BMPs to remove sediment from the dewatering discharge directed to receiving waters, and to control the rate of discharge to prevent adverse effects related to runoff, flooding, and damage to adjacent structures.

Furthermore, as discussed in the EIR/EIS, the Project could conflict with plans, policies, or regulations related to the alteration of coastal landforms or processes adopted to avoid or mitigate environmental effects, resulting in a significant and unavoidable impact. The Project's construction and operation could alter the existing natural beach dynamics and the coastal environment, thereby resulting in altered bluff erosion rates and patterns. Coastal development in California is regulated by the Coastal Commission pursuant to the California Coastal Act. This law stipulates that new developments that could alter natural shoreline processes shall be permitted when required to serve coastal dependent uses, protect existing structures, and only when designed to eliminate or mitigate adverse impacts on local shoreline sand supply (Public Resources Code Section 30235). This law also states that new development must do the following (Public Resources Code Section 30253[b]):

[A]ssure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

The Project was designed with wing walls to emulate the reduced bluff recession rates associated with the SFPUC outlet and to reduce the potential for outflanking² of the outlet structure. Furthermore, the wing walls were added to address the force of high tides and associated wave action, and other coastal processes, including sea level rise, affecting local beach and bluff erosion rates. However, the Preliminary Coastal Engineering Study did not assess the potential impacts of the recommended wing walls on local coastal processes, such as sediment supply, beach profile alterations, or beach and bluff toe retreat. Although the wing walls would assist with structural integrity, they may substantially alter natural landforms along the bluff face by slowing the rate of erosion (Moffatt and Nichol 2013).

The EIR/EIS concluded, based on the available technical studies, professional opinion, and current projections of sea level rise and coastal erosion, that the Project could have substantial adverse effects on local shoreline sand supply, shoreline processes, and localized rates of erosion, and would continue to prevent the bluffs and shoreline from eroding naturally. Under the Modified Project, based on consultation with the Coastal Commission, the wing walls would be removed from the final design. Additionally, the Modified Project would implement **Mitigation Measure 3.9-2**, which would help ensure that the Project would conform with NPS management policies. This measure would require that the Project design is reasonably assured of surviving its

² Basically, going around the side of the structure.

planned lifespan without the need for shoreline control measures. Furthermore, this measure would implement steps to minimize safety hazards and harm to property and natural resources.

However, even with the implementation of **Mitigation Measure 3.9-2** and the removal of the wing walls, the Modified Project may still result in inconsistency with the policies governing local shoreline sand supply and alteration of landforms due to the construction of shoreline protective devices, outlined in California Coastal Act Sections 30235 and 30253. Therefore, this impact would remain significant and unavoidable despite the incorporation of available and feasible mitigation measures. This finding is due in part to the inherent inconsistency between the policies requiring structural integrity with the policy aimed at avoiding shoreline protective devices that would substantially alter natural landforms along bluffs and cliffs.

The Modified Project would also require temporary water supplies to irrigate native plantings for approximately 3 years from water lines operated by the City and County of San Francisco. The proposed plantings would use 2.5 acre-feet of water per year after initial planting until vegetation is established. Additionally, seeded areas may use up to 3.5 acre-feet of water combined in the months immediately after seeding. Given the short-term nature of Project construction and the incremental demand for water during the construction period, the Modified Project would be unlikely to require new water entitlements or new or expanded local water supplies. Therefore, the impact would be less than significant.

Conclusion

Implementation of **Mitigation Measures 3.9-1** and **3.9-2** included in the EIR/EIS would reduce potentially significant impacts from construction and operation. However, impacts would remain significant and unavoidable. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [significant and unavoidable].)**

3.8 Noise and Vibration

3.8.1 Setting

The noise and vibration setting described in Section 3.11, *Noise and Vibration*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing noise and vibration conditions within the Project area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.8.2 Findings of the EIR/EIS

The EIR/EIS analysis identified less-than-significant impacts with mitigation incorporated related to noise and vibration would occur.

3.8.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional noise and vibration impacts in the Project area, including the use of the Pacific Rod and Gun Club work area, diesel generators, and ventilation fans, and the installation of the water recirculation pump.

As described in Section 3.11.5, *Impact Analysis*, of the EIR/EIS, temporary construction-related noise effects would be significant if any of the following would occur:

- Construction noise audible beyond the property of origin would be generated within Daly City between 10:00 p.m. and 6:00 a.m., as specified in the Daly City Municipal Code.
- Construction activity within San Francisco would generate noise levels in excess of 5 A-weighted decibels (dBA) above the existing ambient noise levels at the nearest property line between the hours of 8:00 p.m. and 7:00 a.m.
- Noise levels from specific non-impact construction equipment operating in San Francisco would exceed 80 dBA at 100 feet.
- Noise levels would exceed 70 dBA (speech interference criterion) at the nearest sensitive receptor (building exterior) for construction activities in one place for more than 2 weeks.
- Construction activities would generate substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Table 3-3 outlines typical noise levels produced by construction equipment that are expected to be in operation during Project construction.

The Modified Project would require the use of seven diesel generators and two ventilation fans. One generator and fan would be located within the Fort Funston work area and another generator and fan would be located near the Tunnel's east portal adjacent to the Lakewood Apartments. Ventilation fans would not be used between 8:00 p.m. and 7:00 a.m., and diesel generators are expected to be used 24 hours a day, 5 days a week, with a 25 percent reduction in demand after

the first 6 months. The generator and fan at the Fort Funston work area would be approximately 600 feet from the nearest sensitive receptor, and the generator and fan located at the Tunnel's east portal would be 380 feet from the nearest sensitive receptor. The Modified Project would be required to implement **Mitigation Measure 3.11-1**, which would require that stationary noise-generating construction equipment be muffled, enclosed within temporary sheds, and that insulation be used to minimize noise without interfering with construction.

TABLE 3-3
TYPICAL NOISE LEVELS PRODUCED BY CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Levels (dBA, L_{eq} at 50 feet)
Excavator	81
Compactor	83
Impact or Vibratory Pile Driver	101
Crane	81
Loader	79
Drill Rig	79
Air Compressor	78
Ventilation Fan	79
Dump Truck	76
Generator	81

NOTES: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound pressure level.

SOURCE: ESA 2017

With this measure, noise from the diesel generators and ventilation fans would be attenuated by approximately 10 decibels. Therefore, the use of diesel generators and ventilation fans would produce noise levels up to 51 dBA at the nearest sensitive receptor. This would not exceed the San Francisco Noise Ordinance threshold of 80 dBA at 100 feet, and therefore, the impact would not be significant under this threshold. This level also would not exceed the 70 dBA speech interference criterion for 2 or more weeks and would not exceed 5 dBA above the existing ambient noise level of 56 dBA (SF Planning 2022). Additionally, local topography and natural barriers, such as fences and trees, would further reduce construction noise exposure at individual residences and would not exceed regulatory significance thresholds. With the incorporation of **Mitigation Measure 3.11-1**, impacts from the use of diesel generators and ventilation fans would be less than significant.

The Modified Project would also include non-impact construction activities, such as the installation of habitat restoration sites and a water recirculation pump, use of the Pacific Rod and Gun Club and Fort Funston work areas, use of additional staging sites, and the installation of an access ramp along the Canal. These components would include similar construction activities already described in the EIR/EIS and shown in Table 3-3. The loudest source of non-impact noise generated from typical construction activities would be an excavator, generating 81 dBA while removing plants or soil. Noise from construction activities generally attenuates at a rate of 6 decibels (dB) per doubling of distance (Caltrans, 2013). Assuming an attenuation rate of 6 dB per doubling of

distance, the loudest non-impact construction equipment would reach up to 75 dBA at 100 feet. This would not exceed the San Francisco Noise Ordinance threshold of 80 dBA at 100 feet, and therefore, the impact would not be significant under this threshold.

The nearest sensitive receptors to the Modified Project site are the residences approximately 200 feet from North Lake where habitat restoration sites 1–7 are located (see Figure 2-2); 250 feet from the Pacific Rod and Gun Club work area, the additional Canal staging areas, and the access ramp construction site; and 1,600 feet from the recirculation pump site (see Figures 2-1 and 2-3). At these locations, ongoing construction activities could generate noise levels between 51 dBA and 69 dBA over a period of more than 2 weeks. Construction-generated noise levels below the 70 dBA speech interference criterion for a period of 2 or more weeks would result in a less-than-significant impact. Construction noise exposure at individual residences would also be further reduced by local topography and natural barriers, such as intervening structures, fences, and trees. There may be occasional work where the noise level generated at some receptors could exceed 5 dBA above the existing ambient noise level of 60 dBA (SF Planning 2009), but these occurrences would be intermittent and would not constitute a significant impact.

Furthermore, the Modified Project would include the operation of a water recirculation pump, which would be permanently installed along the bank of Lake Merced (see Figure 2-1). As discussed in the EIR/EIS, the maximum sound level that can be expected to be generated by the water recirculation pump would be 84 dBA at a distance of 3 feet. The pump would be enclosed in an underground concrete structure to attenuate the noise generated by the pump. As discussed previously, the water recirculation pump would be located approximately 1,500 feet from the nearest sensitive receptor. Assuming a 10 dB attenuation from the concrete pump enclosure, the maximum combined noise level from the water recirculation pump would reach approximately 20 dBA at the nearest residential property boundary and therefore would have a less-than-significant impact.

In addition to regulatory thresholds, this analysis evaluates the potential for the Modified Project to result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Some land uses are noise-sensitive in ways not addressed by regulatory noise thresholds, such as recreational areas used for passive activities. At Lake Merced and its surrounding recreational amenities, ambient noise levels average between 50 and 60 dBA day-night average sound level (L_{dn}) due to nearby heavily traveled roadways and other urban uses. The ambient noise levels at Fort Funston generally are below 55 dBA L_{dn} (SF Planning 2009). As stated in the EIR/EIS, on-site construction-related activities could result in a significant impact by resulting in a substantial temporary increase in ambient noise levels at Fort Funston above levels existing without the Project. Implementation of **Mitigation Measures 3.11-1** and **3.11-2**, which would require the use of noise control methods and technologies, would reduce this potential impact to a less-than-significant level. However, areas closest to construction staging and work areas could result in a substantial temporary increase above noise levels existing without the Modified Project, which would be a potentially significant impact.

Therefore, on-site construction-related activities could result in a significant impact by creating a substantial temporary increase in ambient noise levels at recreational areas around Lake Merced

and Fort Funston above levels existing without the Project. Implementation of **Mitigation Measures 3.11-1** and **3.11-2**, which would require the use of noise control methods and technologies, would reduce this impact to a less-than-significant level.

The Modified Project may also result in a temporary increase in vibration levels, which would be a potentially significant impact. Non-impact construction activities would occur near homes at the Lakewood Apartments and the Lakeshore neighborhood, which would include the use of a large bulldozer, loaded trucks, excavators, and compactors. These residential receivers would be located 200 feet from the nearest non-impact construction activities. As discussed in the EIR/EIS, at this distance, these receptors would be exposed to vibration levels of up to 60 vibration decibels and 0.004 inch per second peak particle velocity during non-impact construction activities. These vibration levels are below the Federal Transit Administration's construction vibration thresholds for residential land uses and building damage, and therefore, the impact would be less than significant (FTA 2006).

Conclusion

Implementation of **Mitigation Measures 3.11-1** and **3-11.2** included in the EIR/EIS would reduce potentially significant impacts from construction and operation to less-than-significant levels. The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant with mitigation].)**

3.9 Recreation

3.9.1 Setting

The recreation setting from Section 3.13, *Recreation*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing recreation conditions within the Project area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.9.2 Findings of the EIR/EIS

The EIR/EIS identified the potential for less-than-significant impacts related to recreational resources.

3.9.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on recreational resources in the Project area, including modifications to the Fort Funston work area, the Ocean Outlet design, and the installation of the habitat restoration sites.

As described in Section 3.13.5, *Impact Analysis*, of the EIR/EIS, the Project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment; this would not change under the Modified Project. The Modified Project does not propose and would not require the construction or expansion of recreational facilities. The Modified Project would not result in a permanent increase in the local population or increased demand for the construction or expansion of recreational facilities due to growth.

The Modified Project may increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. However, it is not expected that many recreationists would be displaced from recreational areas in the Project vicinity and thereby substantially increase the use of other nearby parks or recreational facilities. During Project construction, traffic and pedestrian access would be rerouted, or in some areas, such as along Funston Beach, would be temporarily restricted.

As discussed in the EIR/EIS, the Fort Funston work area would occupy approximately 4 acres of the more than 100 acres available for dog walking, restricting access to 4 percent of the area. However, under the Modified Project, the work area would be reduced from 4 acres to 2.5 acres, or 2.5 percent of the 100 acres available. The addition of a 0.44-acre concrete fabrication work area within the Fort Funston parking lot would temporarily decrease the availability of parking for recreationists in the vicinity.

As discussed in the EIR/EIS, at the Ocean Outlet work area, a U-shaped sheet pile cofferdam would be placed around the beach outlet structure to form a barrier to exclude the public, including dogs, from the Project construction area. The cofferdam would be positioned so that

beach access would be maintained during construction. However, during times when vehicles and equipment are being transported along the beach, and during construction of the portion of the submarine outfall pipeline that would be replaced, recreationists would avoid or be restricted from this portion of the beach.

Under the Modified Project, the 70-foot and the 100-foot wing walls would be removed from the final design of the Ocean Outlet (see Figure 2-5b). There would also be other small changes to the design elements shown in the EIR/EIS, including additional supports to the anchor outfall pipe. The work area for concrete pumping activities and the overall layout of the disturbed area for construction activities at the Ocean Outlet location would move just north of the disturbed area shown in Figure 2-5a. However, beach access for recreationists would be maintained and temporary avoidance or restrictions would be in place only when vehicles and equipment are being transported along the beach and during the construction of the portion of the submarine outfall pipeline.

Additionally, construction activities associated with the installation of the habitat restoration sites may also temporarily affect the use of recreational facilities around Lake Merced. This would include short-term impacts that would limit access to and the use of the pedestrian path encircling Lake Merced and limiting the areas on South Lake where water recreational activities, such as boating, are available. However, the construction activities associated with the habitat restoration sites would be short-term, and the impacts on recreational facilities at Lake Merced would be temporary. Furthermore, work areas for the habitat restoration sites would be close to the shore, and the overall South Lake open water area would remain available for boating.

A number of additional trails, bicycle routes, and other general recreational resources that would be available are within the Project vicinity and in the overall western San Francisco and Daly City area. The temporary increased use of other local or regional recreational resources that may be attributable to the Modified Project construction would not likely result in substantial physical deterioration of recreation resources, or otherwise result in physical degradation of existing recreation resources. The potential impact on these other recreation resources would not be more significant than outlined in the EIR/EIS.

Therefore, the Modified Project would have a less-than-significant impact relative to a potential increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur.

Conclusion

The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [less than significant].)**

3.10 Energy Conservation

3.10.1 Setting

The energy conservation setting described in Section 4.2, *Energy Conservation*, of the EIR/EIS remains applicable to the Modified Project. The section provides an overview of existing energy conservation conditions within the Bay Area, presents the associated regulatory framework, and analyzes potential impacts that would result from construction and operation of the facilities proposed under the Project.

3.10.2 Findings of the EIR/EIS

The EIR/EIS analysis identified that no significant impacts related to energy conservation would occur.

3.10.3 Project Change Analysis

Discussion

The Modified Project includes components that could potentially cause additional impacts on energy conservation in the Project area, including the use of diesel generators for construction activities.

As described in Section 4.2.2, *Direct and Indirect Effects*, of the EIR/EIS, the precise amount of petroleum fuel demand that would be required to construct the Project is uncertain. However, it is likely that gasoline and diesel would be used for construction equipment and worker and haul vehicles, comparable to similar construction projects. This consumption would not have a measurable effect on local and regional energy supplies.

As discussed in Section 2.1, *Prior Project Description*, electricity demand during construction would be 1,300 kilowatts, and electricity would be provided to the work area at Fort Funston via a temporary PG&E service connection or by using a portable diesel-powered generator. After certification of the EIR/EIS, Daly City and the NPS determined that the use of a temporary PG&E service connection would not be feasible. Therefore, under the Modified Project, construction activities would be powered by two Tier 4 generators with 80 hp engines. The generators would use diesel fuel and would operate 24 hours a day, 5 days a week, for approximately 18 months, with demand decreasing by 25 percent after the first 6 months.

This energy use would be necessary for the Modified Project, and the use of generators would be short-term and temporary. None of the proposed energy-consuming activities would be wasteful, inefficient, or unnecessary. Additionally, while the EIR/EIS discussed the use of a temporary PG&E service connection, the alternative use of generators was included in Section 2.5.3.4, *Construction Power and Emergency Generators*, of the EIR/EIS. Therefore, the use of these generators would be consistent with previously described activities. The Modified Project would not have a more significant impact on fuel and electrical energy requirements or local and regional energy supplies.

Additionally, the permitting process for the Modified Project would require compliance with all applicable energy-saving policies and standards. As discussed in Section 3.7, *Greenhouse Gas Emissions and Climate Change*, of the EIR/EIS, the California Green Building Standards Code includes a mandatory set of minimum guidelines and more rigorous voluntary measures for energy efficiency and material conservation. Moreover, pursuant to the San Francisco Construction and Demolition Debris Recovery Ordinance, the Modified Project would be required to divert 65 percent of its construction and demolition debris from the landfill. Reusing this diverted debris instead of manufacturing new materials would reduce energy use. Therefore, there would be no impacts on efforts to achieve existing energy standards.

Conclusion

The Modified Project would not result in any new or more severe significant impacts than those identified in the certified EIR/EIS. **(Same impact as previously approved project [no significant impacts].)**

SECTION 4

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