RECLAMATION
Managing Water in the West

Environmental Assessment

West Bay Sanitary District Recycled Water Project at Sharon Heights

17-33-MP

U.S. Department of the Interior
Bureau of Reclamation

January 2018

Mission Statements

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

List of Acronyms and Abbreviations

AFY	Acre-feet Per Year
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
District	West Bay Sanitary District
EA	Environmental Assessment
Golf Course	Sharon Heights Golf and Country Club
IPaC	Information for Planning and Consultation
IS	Initial Study
ITAs	Indian Trust Assets
NEPA	National Environmental Policy Act
PG&E	Pacific Gas and Electric Company
PVC	polyvinyl chloride
SFPUC	San Francisco Public Utilities Commission
SHPO	State Historic Preservation Office
SLAC	SLAC National Accelerator Laboratory
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WWTP	Wastewater Treatment Plant

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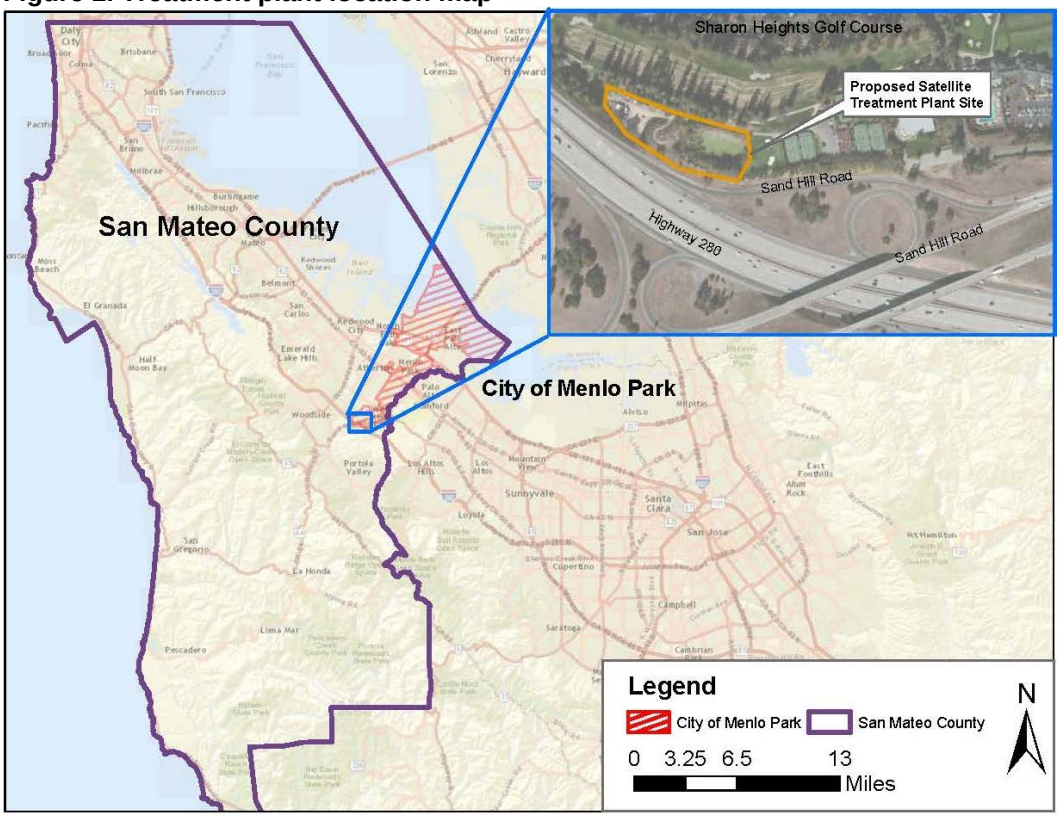
Section 1 Introduction

The West Bay Sanitary District (District) proposes to reuse wastewater by constructing and operating a new satellite wastewater treatment plant (WWTP) on the Sharon Heights Golf & Country Club (Golf Course) property, an influent wastewater supply pipeline under Sand Hill Road, a pump station for the influent supply, recycled water distribution pipelines to the Golf Course irrigation system and to the SLAC National Accelerator Laboratory (SLAC, formerly named the Stanford Linear Accelerator Center), and a solids discharge pipeline to the existing sewer system (Proposed Action) in Menlo Park, San Mateo County, California (Figure 1). The Proposed Action is eligible to compete for Title XVI Water Reclamation and Reuse grant money for partial reimbursement of construction costs.

Figure 1. Treatment plant location map



The study area includes the Golf Course and an arterial roadway, Sand Hill Road. Adjacent to the west side of the study area is a designated State Scenic Highway, Interstate 280. The proposed treatment plant site is located on Golf Course property and is surrounded by trees.

1.1 Background

The water supply for the City of Menlo Park is delivered via the City and County of San Francisco's regional system, operated by the San Francisco Public Utilities

Commission (SFPUC). The SFPUC system supply is from Sierra snowmelt and delivered through the Hetch Hetchy aqueducts. SFPUC wholesales water to Menlo Park Municipal Water District.

1.2 Purpose and need

Within Menlo Park, there are multiple parks and the Golf Course that require irrigation for their turf grass and landscaping. Large amounts of potable water is also used at the cooling tower for the SLAC. The purpose of the Proposed Action would be to replace the potable water supply, currently being used to irrigate areas in the vicinity of the Golf Course and for the cooling tower at SLAC, with recycled water. A market study conducted in August 2014 determined that the Proposed Action would offset potable water usage from SFPUC by approximately 281 acre-feet per year (AFY) (Propersi & Hoeft, 2014). Of the 281 AFY, 222 AFY would be used for irrigation and 59 AFY would be used for the SLAC cooling tower. The potable water savings can be used to accommodate future water demand.

1.3 Previous environmental documents

The District prepared an Initial Study (IS) and adopted a Mitigated Negative Declaration on November 24, 2015, to comply with the California Environmental Quality Act (CEQA). The District evaluated potential effects to: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

Potential impacts to the resources were found to either be less than significant or less than significant with mitigation measures, and no effects were found to be significant and unavoidable. The effects requiring mitigation include: aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, noise, and transportation and traffic (Appendix A). The mitigation measures that are being committed to by the District are described in the IS.

For biological resources, Reclamation incorporates into this EA a 2016 letter of concurrence from the U.S. Fish and Wildlife Service (USFWS) to the State Water Resources Control Board regarding special status species with potential to occur within the Proposed Action area or vicinity (Appendix B).

1.4 Reclamation analysis

Reclamation reviewed the analysis in the IS and found it to be sufficient in identifying potential impacts for all resources except biological resources for the following reason: Reclamation acquired a list of Federal special status plant and wildlife species from the USFWS Information for Planning and Consultation (IPaC) portal (Appendix C) which identified four species not included in the IS analysis. No significant impacts are anticipated for these four species from the Proposed Action due to a lack of appropriate habitat in and around the action area.

These species and their habitats are noted in the Affected Environment and Environmental Consequences section of this EA.

All other resource discussions of the IS were found to be sufficient, and that document is hereby incorporated by reference. For cultural resources, Reclamation requested and received concurrence from the State Historic Preservation Office (SHPO) on the Section 106 process (Appendix D). To satisfy NEPA, executive orders, and Reclamation guidance, this EA also includes discussions of Indian Trust Assets, Indian Sacred Sites, and Environmental Justice which are not requirements of and were not included in the IS.

Section 2 Proposed Action and Alternatives

2.1 No Action Alternative

Under the No Action Alternative, Reclamation would not award the District Title XVI funds for a portion of the Proposed Action, no recycled water would be produced or delivered to the Golf Course or SLAC, and the status quo would be maintained. Both facilities would continue to utilize potable Hetch Hetchy water from the Menlo Park Municipal Water District for irrigation and industrial uses, and be subject to rising rates for Hetch Hetchy water and potential future drought curtailments of supply. The District may secure other funds, such as through the Clean Water State Revolving Fund; however, for the purposes of this EA, the consequences of Reclamation not providing funding for the Proposed Action would result in no construction and no water savings of 281 AFY.

2.2 Proposed Action

Under the Proposed Action, Reclamation would potentially provide partial funding to construct the District's recycled water project which would be built in two phases.

Phase I includes construction of: an influent pipeline and pump station to transport wastewater from an existing sewer line to the new satellite WWTP; the satellite WWTP itself which would include equipment for grit and fine material screening, a membrane bioreactor treatment system, and ultraviolet disinfection; a solids discharge pipeline back to the sewer; a recycled water pump station; and delivery pipelines to SLAC and a separate tie-in to an existing irrigation pipeline to a nearby existing 2 million gallon open reservoir, located at the western edge of the Sharon Heights property. Phase II includes the installation of recycled water distribution pipelines to deliver recycled water to end users in the vicinity of the Golf Course.

2.2.1 Pipelines

Figure 2 illustrates the proposed locations for the new pipelines and satellite treatment plant. The influent pipeline requires 10,600 linear feet of 8-inch diameter polyvinyl chloride (PVC) pipe to deliver wastewater from the influent

pump station to the recycled water treatment facility. The pipeline would be installed along the Sand Hill Road right-of-way and will cross the Hetch-Hetchy right-of-way. An abandoned Pacific Gas and Electric Company (PG&E) gas pipeline under Sand Hill Road may also be used as an alternative to installing an entirely new pipeline.

Approximately 5,300 linear feet of 6-inch diameter PVC recycled water distribution pipelines would be routed along Sand Hill Road to deliver recycled water to SLAC. Storage pond pumps would connect to existing pipes to deliver recycled water to an existing open reservoir at the Golf Course.

Solids produced by the satellite WWTP would be discharged to an existing sewer by gravity through a 1,600 linear foot 6-inch PVC pipe that would run along the southwestern boundary of the Golf Course to connect to an existing sewer within the Golf Course.

Phase II distribution pipelines would require 6,340 linear feet of 6-inch diameter PVC pipe to be laid between the satellite WWTP to three areas: Rosewood Sand Hill, Sand Hill Commons, and Sharon Land Company.

2.2.2 Treatment plant

The treatment plant (Figure 3) would be located in a 130 foot by 160 foot masonry block structure. An electrical service transformer will be located outside of the treatment building on a 6 foot by 6 foot pad with other ancillary electrical equipment located in the treatment building. Disinfection and effluent pumping facilities would be located in a separate 100 foot by 100 foot building, with the disinfection unit located below grade.

Figure 2. Proposed pipeline distribution and satellite WWTP location

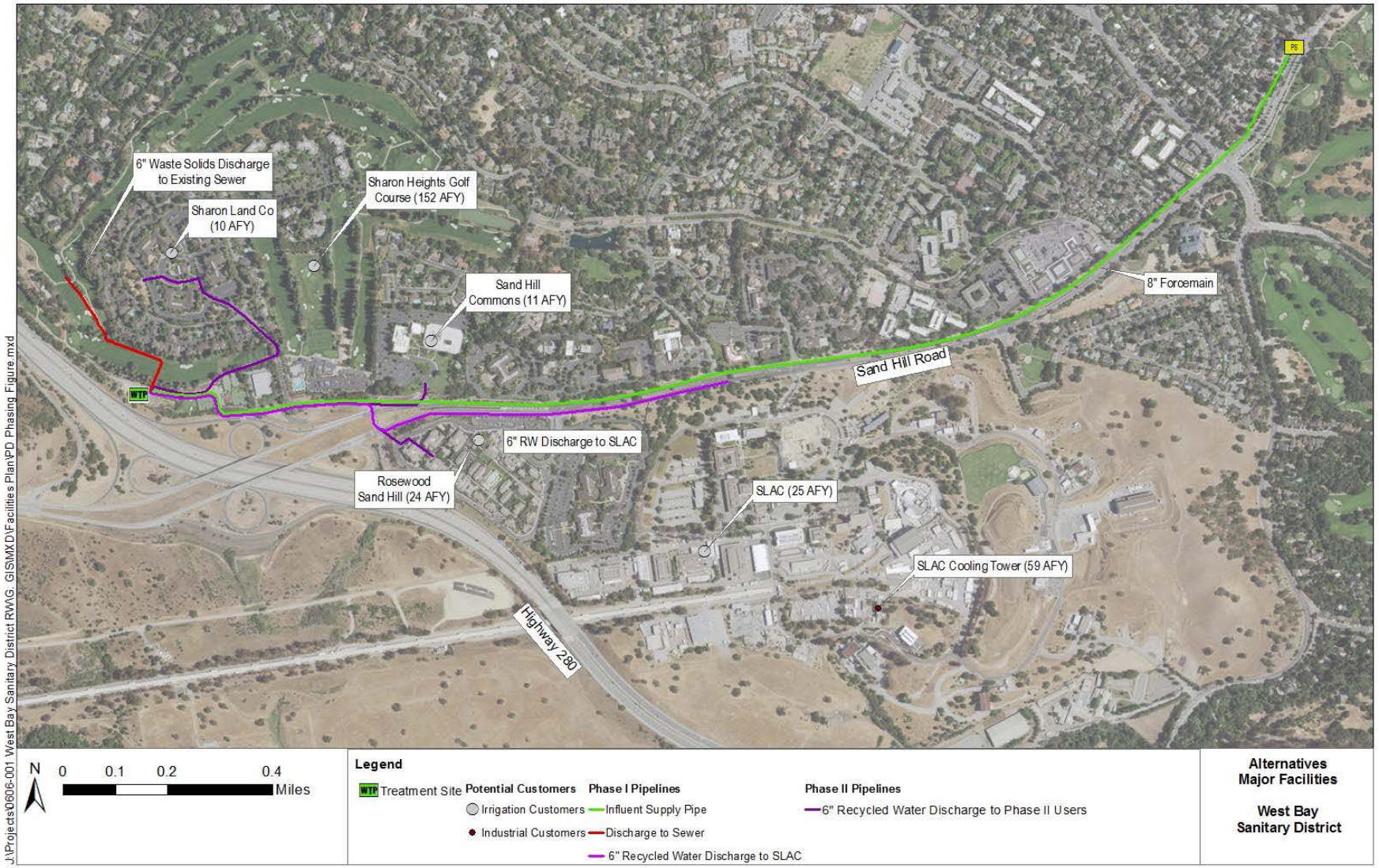


Figure 3. Proposed treatment plant footprint

Section 3 Affected Environment and Environmental Consequences

This section discusses resources affected by the Proposed Action and uses the IS as a primary resource in the analysis.

3.1 Required Resource Discussions

Department of Interior Regulations, Executive Orders, and Reclamation guidelines require a discussion of Indian sacred sites, Indian Trust Assets, and Environmental Justice when preparing environmental documentation. Impacts to these resources were considered and found to be minor or absent. Brief explanations for their elimination from further consideration are provided below:

3.1.1 Indian Trust Assets

Indian Trust Assets (ITAs): are legal interests in property or rights held in trust by the United States for federally recognized Indian Tribes or individual Indians. Indian reservations, Rancherias, and Public Domain Allotments are common ITAs in California. There are no Indian reservations, rancherias or allotments in the Proposed Action area. The closest ITA is the Lytton Rancheria, 34 miles to the north. The Proposed Action does not have a potential to affect ITAs (see Appendix E).

3.1.2 Indian Sacred Sites

Executive Order 13007 (May 24, 1996) requires that Federal agencies accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners, and avoids adversely affecting the physical integrity of such sacred sites.

Reclamation contacted the Indian Canyon Mutsun Band of Costanoan, the Ohlone Indian Tribe, and Trina Marine Ruano Family, identified as Native American organizations likely to have knowledge or concerns with historic properties in the area. No response has been received, but if concerns are subsequently raised Reclamation will work to address them and make notifications as required.

3.1.3 Environmental Justice

Executive Order 12898 requires each Federal agency to identify and address disproportionately high and adverse human health or environmental effects, including social and economic effects of its program, policies, and activities on minority populations and low-income populations. The Proposed Action would cause no disproportionately high and adverse human health or environmental effects in the community. Mitigation measures described in the IS would reduce potential impacts.

3.2 Environmental Consequences of the No Action Alternative

Under the No Action Alternative, Reclamation would not award the District with Title XVI grant money for construction. Although it is possible that the District may find alternate sources of funding, for the purposes of this EA, the consequences of Reclamation not providing funding for the Proposed Action would result in no construction of the Sharon Heights Recycled Water Project. The Gold Course and SLAC would continue to utilize imported Hetch Hetchy water to and there would be no future water savings of 281 AFY (222 AFY + 59 AFY).

3.3 Environmental Consequences of Funding the Proposed Action

Reclamation reviewed the District's IS and conducted supplemental analyses required under National Environmental Policy Act (NEPA) and finds that there are no significant and unavoidable impacts associated with funding the Proposed Action. All potential effects of the Proposed Action are considered less than significant with the District's adopted mitigation measures.

3.3.1 Biological Resources

Reclamation acquired a list of Federal special status plant and wildlife species from the USFWS IPaC portal (Appendix C). The list identified four species that were not included in the IS analysis, however no significant impacts are anticipated for these species from the Proposed Action due to the lack of habitat in and around the action area.

Table 1: IPaC Special Status Wildlife Species not in IS

Scientific Name	Common Name	Federal Status	Effects	Potential Habitat Utilized by species in Proposed Action Area
FISHES				
Hypomesus transpacificus	Delta smelt	T	NE	**Absent.** The Proposed Action occurs within the general range of this species. No suitable aquatic or riparian habitat in the Proposed Action area.
INSECTS				
Callophrys mossii bayensis	San Bruno Elfin Butterfly	E	NE	**Not Likely to Occur.** The Proposed Action occurs within the general range of this species, but there is no suitable habitat (rocky outcrops and cliffs in coastal scrub) in the Proposed Action area.
MAMMALS				
Reithrodontomys raviventris	Salt Marsh Harvest Mouse	E	NE	**Not Likely to Occur.** The Proposed Action occurs within the general range of this species, but suitable habitat for this species (salt marsh) does not occur within the Proposed Action area.

Scientific Name	Common Name	Federal Status	Effects	Potential Habitat Utilized by species in Proposed Action Area
REPTILES				
Chelonia mydas	Green Sea Turtle	T	NE	**Absent.** The Proposed Action occurs within the general range of this species. No suitable sea or shore habitat in the Proposed Action area.

Source: USFWS, 2017 (Appendix C)
E = Endangered
T = Threatened
NE = No Effect

3.3.2 Cultural Resources

A cultural resources survey report (dated October 15, 2015) and a letter report for the Extended Phase I archaeological survey (dated June 24, 2016) was completed for the Proposed Action. No effects to historic properties by the Proposed Action are expected; however, the existence of prehistoric sites in areas surrounding the Proposed Action area make it sensitive for buried archaeological resources. If archaeological resources are encountered during ground-disturbing activities, all ground-disturbing work within the vicinity of the find would be temporarily suspended or redirected until an archaeologist has evaluated the find and a determination has been made as to whether it qualifies as an archaeological site.

3.4 Cumulative Impacts

According to Council on Environmental Quality regulations for implementing the procedural provisions of NEPA, a cumulative impact is defined as *the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time* (40 CFR 1508.7).

Impacts of the Proposed Action could cumulatively affect visual resources, air quality and climate change, hazards and hazardous materials, noise, and transportation and traffic, though none are significant. The following long-term impacts and mitigation described here are noted in various sections of the IS.

Long-term impacts to visual resources would result from the establishment of the proposed treatment plant on the Golf Course property; however, the treatment plant would lie well below the existing tree line surrounding the site. The District will landscape disturbed areas to minimize contrasts with existing vegetation and to screen facilities from nearby neighborhoods. The District will also paint the facilities low-glare earth tone colors that blend in with the surrounding area.

Impacts to air quality and greenhouse gas emissions would come from chemical delivery truck trips and operation of the WWTP and pumping facilities; however these emissions will be minimal. Pumping and treatment facilities will generate indirect emissions from off-site PG&E power generation facilities. Small electric

generator(s) will be operated on-site in case of power loss to maintain power to peripheral systems. Backup generator(s) would only be used in the event that grid power is not available or for backup system testing; the duration of these activities is expected to be minimal.

Operation of the WWTP would require the routine transport and use of hazardous materials and substances for treatment, cleaning, and other operation and maintenance purposes (24 truck trips per year). Materials may include lubrication oils, grease, sodium hypochlorite, caustic soda, and citric acid. During operations, chemicals that would be transported to and/or from, and used at, the proposed treatment facility will be stored in double containment to ensure protection in the event of an accidental spill; and the depth of the tanks relative to the surrounding terrain would afford extra protection in the event of an accidental spill.

Cumulative noise impacts would come primarily from operation of the pump station and the additional truck trips required for delivery of materials necessary for operation. The noise-generating components of the facility would be enclosed in buildings, which would dampen the noise produced. Operation of the pump station could generate noise levels that could exceed the levels established in local noise ordinance and/or OSHA standards; therefore the wastewater pump station facility would be located more than 100 feet from the nearest house. The treatment facility would be located near an existing freeway, which increases the overall ambient noise levels in the area.

Operation of the WWTP would result in an estimated 128 additional truck trips to the treatment facility per year (24 for chemical deliveries and 104 for screening and grit removal). These truck trips, spread evenly over the course of the year would result in approximately 2.5 additional truck trips per week, which will not significantly affect overall traffic patterns in the area.

Section 4 Consultation and Coordination

4.1 Agencies and Persons Consulted

Reclamation consulted and coordinated with the West Bay Sanitary District, the California Office of Historic Preservation, and the U.S. Fish and Wildlife Service.

4.2 Endangered Species Act (16 USC § 1531 et seq.)

Section 7 of the Endangered Species Act requires Federal agencies, in consultation with the Secretary of the Interior, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species, or result in the destruction or adverse modification of the critical habitat of these species.

Reclamation reviewed the existing consultation with USFWS (Appendix B) and did a USFWS IPaC search (Appendix C) for special status species in the Proposed Action area. The IPaC list identified four species not included in the IS analysis; however suitable habitat for these four species is not present in the Proposed Action area. Thus, Reclamation determined that the Proposed Action would have no effect on these species, and no additional consultation is needed.

4.3 National Historic Preservation Act determination

The National Historic Preservation Act of 1966, as amended (Title 54 USC § 306108.), requires that Federal agencies give the Advisory Council on Historic Preservation an opportunity to comment on the effects of an undertaking on historic properties, properties that are eligible for inclusion in the National Register of Historic Places. The 36 CFR Part 800 regulations implement Section 106 of the National Historic Preservation Act.

Compliance with Section 106 follows a series of steps that are designed to identify interested parties, determine the area of potential effects, conduct cultural resource inventories, determine if historic properties are present within the area of potential effects, and assess effects on any identified historic properties.

The Federal agency (Reclamation) identifies cultural resources, the level of effect that the Proposed Action will have, and consults with the SHPO to seek concurrence on Reclamation's findings. Cultural resources is a broad term that includes prehistoric, historic, architectural, and traditional cultural properties. In addition, Reclamation is required by Section 106 to consult with Indian Tribes concerning the identification of sites of religious or cultural significance, and consult with individuals or groups who are entitled to be consulting parties or have requested to be consulting parties.

Reclamation submitted a cultural resources survey report (dated October 15, 2015) and a letter report for the Extended Phase I archaeological survey (dated June 24, 2016) for the Proposed Action to SHPO on April 20, 2017, for review

(Appendix D). Reclamation asked for concurrence that no historic properties would be affected pursuant to 36 CFR § 800.4(d)(1) for the proposed undertaking. SHPO responded on May 25, 2017, concurring that no historic properties would be *adversely* affected; noting that the State Water Resources Control Board, which is also providing partial grant funding for the Sharon Heights Recycled Water Project, had previously consulted with the Office of Historic Preservation in 2016.

5.0 References

City of Menlo Park. 2015. Menlo Park Municipal Code. Accessed April 7, 2015. Available: http://www.codepublishing.com/ca/menlopark/

Propersi, M. and M Hoeft. 2014. *Technical Memorandum: West Bay Sanitary District Recycled Water Market Assessment Project*.

RMC and Rincon Consultants. 2015. Final West Bay Sanitary District Recycled Water Project – Sharon Heights Mitigated Negative Declaration. Available: https://westbaysanitary.org/wp-content/uploads/2015/10/WBSD_RW_Sharon_Heights_MND_Public_Draft_Oct2015.pdf

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Appendix A: CEQA Initial Study Environmental Checklist

Introduction

The purpose of this preliminary evaluation is to identify expected environmental impacts from implementation (construction and operation) of the West Bay Sanitary District's Recycled Water Recommended Project. In addition, this analysis is intended to help the City determine the level of environmental documentation that will be needed at the next stage of CEQA environmental review. The environmental topics discussed in this document are based on Appendix G of the CEQA Guidelines. The anticipated environmental impacts are identified for each resource area. The level of significance for each resource area uses CEQA terminology as specified below:

- No Impact;
- Less than Significant;
- Less than Significant Impact with Mitigation Incorporation; and
- Potentially Significant Impact.

Project Description

Chapter 8 of the Recycled Water Facility Plan provides a discussion of the Recycled Water Recommended Project. The figures in that section identify the locations of the proposed facilities within the Sharon Heights Golf & Country Club property and the proposed pipeline alignments within the City of Menlo Park's boundaries. For the purposes of this preliminary analysis, it is assumed that construction activities would involve grading, excavation, erection of facilities, installation of pipelines using open-trench construction, and backfilling. Typical construction equipment would be used, including but not limited bulldozers, backhoes, water trucks, dump trucks, excavators, and concrete trucks. Construction activities would likely last for one year overall but would be less for each component (e.g., treatment facilities and the proposed pipeline segments). Details of the construction scenarios will be developed as the project progresses into design, and will be evaluated in more depth in the upcoming environmental analysis. The following preliminary analysis is based on the current understanding of the project construction and operation as described Chapter 8 of the Recycled Water Facility Plan. This analysis shows that the majority of the impacts would be less than significant. Where potential significant impacts are anticipated, they would be reduced to less than significant with implementation of mitigation measures that will be further developed during the CEQA process. No significant, unavoidable impacts have been identified.

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Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Aesthetics		
Adverse effect on a scenic vista	LTS	• The City of Menlo Park has identified stretch of Sand Hill Road from Santa Cruz Avenue to Highway 280 as a View Corridor. Impacts to the View Corridor are minimized to less than significant by the low profile of planned project facilities, screening structures and coverage provided by trees between the project and Sand Hill Road. • Construction of all proposed facilities would temporarily alter the visual quality of the affected area due to the presence of construction equipment, but would not result in any permanent visual changes. • Proposed pipelines would ultimately be buried underground and out of sight. No visual impacts would occur. • Within the Project area, there is one officially designated State Scenic Highway (I-280) located immediately adjacent (to the west) to the Project. Impacts to the scenic resources are minimized to less than significant by the low profile of the Project, the size of the treatment plant, the speed of traffic on I-280, screening structures and coverage provided by trees between the Project and I-280.
Substantial damage to scenic resources, including trees, rock outcroppings or historic buildings within a state scenic highway	LTSM	
Substantial degradation of the existing visual character or quality of the site and its surroundings	LTSM	
Creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area	LTS	
Agricultural and Forestry Resources		
Conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Important (Farmland) or conflict with existing zoning for agricultural use of a Williamson Act contract	NI	• The Study Area falls entirely within Urban/Built and Other land designations. There are no Farmlands or forestry resources within the Study Area.
Loss of forest land or conversion of forest land to non-forest land or change in the existing environment which could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use	NI	
Air Quality		
Conflict with or obstruction of implementation of the applicable air quality plan or cumulative considerable net increase of any criteria pollutant for	LTSM	• Construction activities would generate dust and criteria pollutant emissions that could, but are not expected to, exceed Bay Area Air Quality Management District (BAAQMD) standards. These emissions have not yet been quantified.

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
which the project region is nonattainment		• Excavation and hauling trips could generate criteria pollutant emissions that exceed BAAQMD thresholds and result in a potentially significant impact. Mitigation measures could include implementation of dust control measures, sequencing (phasing) work to reduce daily emissions (including preconstruction grading to prepare the site), and/or requiring contractors to implement best available control technology for construction equipment. Air quality modeling would be conducted during the next stage of CEQA review to confirm this conclusion.
Violation of any air quality standard or substantial contribution to an existing or projected air quality violation	LTSM	
Exposure of sensitive receptors to substantial pollutant concentrations	LTS	
Creation of objectionable odors affecting a substantial number of people	LTSM	• Operation of the Proposed Project is expected to generate minimal emissions from chemical delivery truck trips and operation of the satellite treatment facility. Based on the number of truck trips and existing assumptions, operational-related air quality impacts are anticipated to be less than significant. • Trinity School, Stanford Hills Park and some residential units are located along the alignment of the Proposed Project influent supply pipe. Given the short duration of construction, and mitigation measures that would be implemented as described above to reduce dust, sensitive receptors at the school and at nearby residences are not expected to be exposed to substantial pollutant concentrations. • Potential objectionable odors may occur treatment facility during operation. However, biological basins would be constructed below grade, with covers at grade level for odor control. With this mitigation measure in place, and the relatively small size of the treatment facility, impacts from operation are expected to be less than significant. • There is also potential for some objectionable odors during construction (e.g., diesel fuel), but these would be temporary in nature and considered less than significant.
Biological Resources		
Effects on candidate, sensitive, or special status species or sensitive habitat	LTSM	• A California Natural Diversity Database (CNDDB) search for sensitive resources was conducted for information regarding the locations of known observations of Federal and State-listed sensitive species and habitats in the vicinity of the Project area. Information on wetlands, creeks, and/or other water bodies was derived from the U.S. Fish and Wildlife Service's Wetland Digital Database. Biological resources surveys have not been completed for this preliminary analysis. • Impacts to terrestrial biological resources from the Proposed Project are expected to be minimal. No critical habitat occurs in and around the Proposed Project (USFWS, 2015a); although nearby trees and shrubs may provide habitat for birds and other species. A field reconnaissance survey is still needed. Mitigation measures (such as restriction on the
Substantial interference with the movement of fish or wildlife species, their or native wildlife nursery sites	LTS	
Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California	LTS	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Department of Fish and Game or U.S. Fish and Wildlife Service		timing of construction) are expected to be available to reduce any impacts to terrestrial biological resources to less than significant. • Operation of the Proposed Project is not expected to result in any significant impacts on special-status aquatic resources. Potential impacts to aquatic biological resources from the Proposed Project would be less than significant, and no additional mitigation would be required. • There are no creeks in or near the project area. • The disposal pipeline would be constructed within roadway ROWs, and is not expected to interfere with wildlife movement. Menlo Park does not have any Priority Conservation Areas and construction of the treatment facility is not anticipated to affect wildlife movement. • Some trees would be removed for construction of the treatment facility. All such trees are located within the property line of the Sharon Heights Golf Course. To the extent possible, trees that currently provide screening between residences, Highway 280 and the treatment facility would remain in place. It is anticipated that only non-heritage trees and shrubs would be removed. If heritage trees must be removed, then appropriate mitigation measures, consistent with the City of Menlo Park's tree removal policy, shall be implemented to reduce impacts to less than significant. • The Proposed Project would not be sited in any of the areas designated by the Midpeninsula Regional Open Space District as Priority Conservation Areas.
Substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act	LTS	
Conflict with any local plans, policies or ordinances protecting biological resources	LTSM	
Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan	NI	
Cultural Resources		
Alteration of or damage to cultural resources (i.e., historical and archaeological resources, including human remains, and paleontological resources)	LTSM	• No cultural resources study or records search through the Northwest Information Center for the California Historical Research Information System, or reconnaissance survey were conducted as part of this preliminary analysis. • The Cultural Resources Inventory Report has not yet been conducted but would be completed as part of future CEQA review. Because of the potential for unrecorded cultural resources sites to be found during excavation activities, impacts to cultural resources would be considered significant. However, mitigation measures are available to reduce potential impacts to less than significant levels.

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Geology, Soils and Seismicity		
Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic risks or landslides	LTSM	• Proposed facilities are not habitable structures. • The City of Menlo Park is located adjacent to the San Andreas Fault. The Alquist-Priolo map for the region indicates that the proposed project site is within fault zones, landslide and liquefaction zones. None of the Proposed Project components would cross a known fault line or otherwise expose people or structures to ruptures of a known fault. However, there is potential for exposure to ground shaking. • Shaking hazard maps show the Study Area is at risk for very strong shaking. Due to the Proposed Project's location, it would be subject to design and construction regulations
Substantial soil erosion or the loss of topsoil	LTSM	
Exposure of people or structures to unstable or expansive soils	LTSM	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposals systems where sewers are not available	LTS	compliant with the 2013 California Building Code. This compliance would reduce the risks associated with seismic activities to less than significant levels. • Liquefaction mapping from U.S. Geological Survey (USGS) shows that the Study Area is primarily within no or low liquefaction susceptibility areas. Additional compliance with applicable codes, regulations, and standards would reduce risks to the Proposed Project from liquefaction to less than significant. • Soil erosion is possible during construction, particularly due to grading activities at the treatment facility site. Implementation of typical Best Management Practices (BMPs) and the required SWPPP would reduce the potential risk for soil erosion or loss. Additional mitigation measures may be required to reduce the risk of soil loss during grading or other construction activities. • The waste disposal pipeline component of the Proposed Project would not affect the stability of the geologic unit or soil, or result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. The grading and excavation required for the treatment facility could create the potential for collapse or on-site landslide, but with the installation of the retaining wall, geotechnical investigation for the retaining wall and treatment facilities, and proper engineering and compliance with all applicable codes and regulations, potential impacts is expected to be reduced to less than significant. • Portions of the Study Area are located in clay loam soils, which have some potential for expansion. Mitigation measures, including preparation of a geotechnical study and implementation of its recommended measures, would reduce the potential for unstable soils to adversely affect the Proposed Project. • The Proposed Project includes wastewater treatment for non-potable reuse, but does not include septic-related waste. Sewers are available in the project vicinity for waste, including waste from the treatment processes.
Greenhouse Gas Emissions		
Generation of greenhouse gas emissions that may have a significant impact on the environment	LTSM	• Air quality modeling has not been conducted for the proposed Project. Operation of the treatment facility (including chemical trip deliveries) is expected to generate greenhouse gas emissions, but is not anticipated to exceed BAAQMD thresholds. Air quality modeling would be conducted in the next stage of CEQA review to confirm the results.
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTSM	
Hazards and Hazardous Materials		

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or accident involving the release of hazardous materials into the environment	LTSM	• Construction would not require the long-term routine transport, use, or disposal of hazardous materials. However, hazardous materials and substances such as diesel fuel would be transported to, handled and used at the construction sites and could present a hazard to the public or the environment through their accidental release. One school is located within one-quarter mile of the proposed work sites. With mitigation, such as the preparation and implementation of a Health and Safety Plan and a Hazardous Materials Management and Spill Prevention Plan and Control Plan, potential impacts would be reduced to less than significant. • Operation of the treatment facility would require the long-term routine transport and use of hazardous materials and substances for treatment, cleaning, and other operation and maintenance purposes. Chemicals that would be transported to and/or from, and used at, the proposed treatment facility may include anionic or nonionic emulsion polymer, lubrication oils, grease, sodium hypochlorite, aqueous ammonia, ferric chloride, sodium bisulfite, antiscalent, carbon dioxide, carbonic acid, caustic soda, citric acid, fluorosilicic acid, and lime. All of the chemical facilities would be stored in double containment to ensure protection in the event of an accidental spill, and the depth of the tanks relative to the surrounding terrain would afford extra protection in the event of an accidental spill. Because Trinity School and some residences are within one-quarter mile of the treatment facility, impacts associated with the accidental release of hazardous materials are considered potentially significant. However, with the mitigation measures described above and compliance with the City's Emergency Operation Plan, the risk of hazardous materials release is low, and potential impacts would be reduced to less than significant. • Based on a review of the California Department of Toxic Substances Control's (DTSC's) EnviroStor database, the Proposed Project's components would not be located on or near a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). • The Study Area does not include any airports. The nearest airport to the Study Area is in the City of Palo Alto, six miles northeast of the Proposed Project. As such, the Proposed Project would not expose people residing or working in the area to safety hazards. • Construction activities for the proposed influent and waste disposal pipelines may require temporary lane or road closures that could impede emergency responses. Mitigation Measures, such as a Traffic Management Plan would be required, and would address any potential interference with emergency response and/or evacuation plans, and would reduce these impacts to less than significant.
Emission or handling of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTSM	
Located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5	LTSM	
Located within two miles of a public airport or private airstrip and result in a safety hazard for people residing or working in the project area.	NI	
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	LTSM	
Exposure of people or structures to significant risk of loss, injury or death involving wildland fires	NI	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
		• The Study Area is not at risk of wildland fires; therefore there would be no impact for risks associated with wildland fires and fires in urban-wildland interface areas.
Hydrology and Water Quality		
Violation of water quality standards or waste discharge requirements or degrade water quality	LTSM	• Excavation, grading, and construction activities associated with construction of the Proposed Project could result in water quality violations from soil disturbance and potential sedimentation and erosion. It could also cause water quality violations in the event of an accidental fuel or hazardous materials leak or spill. The Construction General Permit requires the preparation and implementation of a formal SWPPP which must be prepared before construction begins. The SWPPP includes specifications for BMPs implemented during construction to control sedimentation or pollution concentration in stormwater runoff. • The Proposed Project would be designed and operated in accordance with the applicable requirements of California Code of Regulations (CCR) Title 22 and any other local legislation that is currently effective or may become effective as it pertains to recycled water. • Salts and nutrients are a potential concern because recycled water could conceivably add measurable quantities of salts and/or nutrients and cause a drinking water quality objective to be exceeded if assimilative capacity did not otherwise exist. The Proposed Project site does not overly a regional aquifer or groundwater basin, but localized aquifers may be present. Runoff or subsurface flows could also run into the San Mateo Plain Subbasin, located to the east of the project. Adherence of the Proposed Project to all appropriate Title 22 requirements would ensure that potential impacts to public health or groundwater quality would be less than significant. Thus, No mitigation measures are required. • The Proposed Project does not include groundwater pumping or recharge, and would have no impact to aquifer volumes or groundwater table levels. • The Proposed Project would not alter the course of a stream or river. • The Proposed Project could temporarily alter the drainage of the Study Area during construction and excavation activities, which could result in additional sedimentation and erosion if mitigation measures are not incorporated to reduce these potential impacts. Additionally, installation of facilities at the treatment facility site could create additional runoff, sedimentation, and erosion during operation due to the grading needed at the site and the increased impermeable surface area. Installation of appropriate drainage (stormwater) facilities and erosion control at the site may be necessary to accommodate additional stormwater flows and reduce the potential for localized siltation/erosion and
Substantial depletion of groundwater supplies or interference with groundwater recharge	LTSM	
Substantial alteration of the existing drainage pattern of the site or area	LTSM	
Creation of contribution of runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	LTS	
Substantially degrade water quality	LTSM	
Placement of housing within a 100-year flood hazard area, or structures within a 100-year flood hazard area which would impede or redirect flood flows	NI	
Exposure of people or structures to a significant risk or loss, injury or death involving flooding.	NI	
Inundation by seiche, tsunami or mudflow	NI	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
		flooding, respectively. The inclusion of design elements to address runoff would ensure that impacts during operation of the Proposed Project would be less than significant. • The Proposed Project would not construct housing; therefore it would have no impact related to placing housing within a 100-year flood zone. • The Proposed Project is not located in and would not cross any flood zones. • The Proposed Project would not expose people to risks of flooding, dam, or levee failure. The treatment facility is the only component of the Proposed Project that would require staffing long-term, and is not located in a flood zone or downstream of an existing dam or levee. • There are no large enclosed water bodies in the project area that would be subject to seiche. Coastal low-lying areas in the City of Menlo Park may be affected by tsunamis, but the project area is over five miles away from the coast and at an elevation of over 200 feet above sea level. The impacts from seiche, tsunamis, and mudflows are expected to be less than significant.
Land Use and Planning		
Physically divide an established community	NI	• The Proposed Project is located within roadway ROWs and within the property line of the Sharon Heights Golf Course. As the treatment facility site is landlocked by other land uses and is under private ownership, development on this land would not divide the existing community. • The Proposed Project would be constructed in Open Space (for the treatment facility) and roadway ROWs (pipelines). Utility Substations can be located in Open Space with approval of a Use Permit. Acquisition of the permit and compliance with its conditions would ensure that the Project would not conflict with any application land use plan, policy or regulation and impacts would be less than significant.
Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect	LTSM	
Conflict with any applicable HCP or NCCP	NI	
Mineral Resources		
Loss of availability of a known mineral source	NI	• There are no active mining or mineral resource extraction occurring within the Study Area.
Noise		
Exposure of persons to or generation of noise levels in excess of standards or excessive groundbourne vibration	LTSM	• Construction of the Proposed Project would involve the use of heavy equipment that could create noise substantially above existing ambient noise levels. It also has the potential to generate noise in excess of relevant local noise regulations. Mitigation measures, such as limiting vibration to under appropriate thresholds for structures and people, would be needed to reduce potential construction-related impacts to less than significant.
Substantial permanent or periodic increase in ambient noise levels in the project vicinity	LTSM	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Exposure of persons residing or working within the vicinity of a private airstrip or public use airport to excessive noise levels	NI	• Once constructed, the influent and disposal pipelines would not produce any excess noise. • The treatment facility would produce permanent noise, primarily from the pump station and the additional truck trips required for delivery of materials necessary for operation. The noise-generating components of the treatment facility would be enclosed in buildings, which would dampen the noise. Furthermore, the treatment facility would also be located near an existing freeway, which would drown out much of the noise created by the treatment facility. • There are no airports or airstrips within the vicinity of the Proposed Project.
Population and Housing		
Induction of substantial population growth in an area either directly or indirectly	LTS	• The Proposed Project would not directly induce population growth because it would not produce additional water supply, but instead replaces imported supply (purchased water) with a more desirable (locally-produced) water. • The Proposed Project would not displace existing housing or people
Displacement of substantial numbers of existing people or housing	NI	
Public Services		
Substantial adverse physical impacts to public services including but not limited to fire and police protection, schools and parks	NI	• The Proposed Project would involve the production and delivery of recycled water to meet existing demand, and disposal of wastewater produced by the treatment process. It would not increase the use of or demand for public services (e.g., schools, parks, police, fire, or other public facilities).
Recreation		
Substantial physical deterioration of park facilities	NI	
Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	NI	• The Proposed Project would create recycled water to offset potable water use on an existing golf course, but not cause an increase in the use of existing parks or other recreational facilities.

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
Transportation/Traffic		
Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system	LTSM	• The Proposed Project would be constructed within roadway ROWs and within the Sharon Heights Golf Course property. For the waste disposal pipeline, open trench construction would be employed except at sensitive crossings, if any, where trenchless methods would be used. The assumed 30-foot construction footprint may require closure of some traffic lanes, thus reducing roadway capacities. • Construction traffic could result in increased traffic volumes. Mitigation measures, such as development and implementation of a Traffic Control Plan, would be required to reduce traffic-related impacts of potential temporary lane closures during construction of the influent and disposal pipelines. There may be traffic impacts related to increased truck traffic during construction of the treatment facility, but no road closures are anticipated for this component of the Proposed Project. • The Proposed Project would not affect air traffic patterns, and would be located sufficiently far from an airport or airstrip to avoid creating a substantial air traffic safety risk. • The Proposed Project would not create or substantially increase a traffic hazard due to a design feature. The roadway ROWs excavated for pipelines may be temporary reconfigured to accommodate construction activities, but would be restored to preconstruction conditions upon project completion. • Lane closures and other potential traffic impacts caused by construction activities associated with the Proposed Project would have potential to impede emergency response to those areas, or to areas accessed via those routes. Mitigation Measures, such as the development and implementation of a Traffic Control Plan, would reduce these impediments to less than significant. • Upon completion, the Proposed Project would not conflict with adopted policies, plans, or programs regarding alternate transportation, nor would it decrease the safety of these facilities. Mitigation measures, such as development and implementation of a Traffic Control Plan, would reduce potential impacts to less than significant.
Conflict with applicable congestion management program	LTSM	
Changes in air traffic patterns, resulting in substantial safety risks	NI	
Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses	LTS	
Inadequate emergency access or parking capacity	LTSM	
Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities	LTSM	
Utilities and Service Systems		
Exceedence of wastewater requirements of the applicable Regional Water Quality Control Board	LTSM	• The Proposed Project would not increase the concentration of wastewater produced in the Study Area, but decrease the quantity of wastewater produced. It would convey waste produced at the treatment facility to the WBSD system for disposal. Based on the project size and relative contribution to the collection system, it is not anticipated to require SVCW to amend its NPDES permit to accommodate the flow.
Expansions of, or construction of new water, wastewater, or stormwater facilities cause significant environmental effects or physical	LTS	

Environmental Topics	Expected Impact	Discussion of Major, Potential Environmental Effects
deterioration of a public facility due to increased use as a result of the project		• The Proposed Project would not cause SVCW to exceed the wastewater treatment requirements of the RWQCB and the SVCW NPDES would not need to be amended prior to the Proposed Project. • The Project proposes the construction of a treatment facility and influent and disposal pipelines. It does not include expansion of existing facilities (beyond those evaluated in this document). • The Proposed Project would require additional on-site drainage facilities at the treatment facility site. The Proposed Project would increase the amount of impervious surface at the site, increasing total stormwater runoff to some degree. Mitigation measures to reduce potential effects could include improvements to the existing stormwater system, as needed. • The Proposed Project would augment the District's capacity to serve the region's demand. • The main contributor to solid waste (soil) generated by the Proposed Project would be the excavation and disposal of soil from the treatment facility site. Solid waste (soil) generated by the Proposed Project would likely be hauled to ??. Mitigation measures, such as maximizing reuse of excavated soil to the extent possible, including use as backfill for the pipelines, or identifying an alternate disposal site and/or construction timing should the identified landfill not be able to accommodate all of the waste, would reduce this potential impact to less than significant. Solid waste would be disposed of in accordance with all applicable federal, state, and local statutes and regulations.
Sufficient water supplies or capacity to serve the project	NI	
Adequate wastewater treatment capacity to serve the project	NI	
Have sufficient capacity at a landfill to accommodate the project's solid waste disposal needs and compliance with statues and regulations related to solid waste	LTSM	
Comply with federal, state and local statues and regulations related to solid waste	NI	
Mandatory Findings of Significance		
Substantial environmental degradation (e.g., reduction of sensitive habitat, endangered plant or animal species, or cultural resources,	LTSM	• Mitigation measures are anticipated to reduce potential biological and cultural impacts to less than significant. • Most of the potential impacts from the Proposed Project would occur during construction. While all potential impacts of the Proposed Project could be mitigated to less than significant, there is potential for cumulatively considerable impacts in combination with other past, present, and probable future projects. This is most likely to occur in relation to air quality emissions, and the potential to contribute to global climate change. Further analysis of the potential cumulatively considerable impacts would be required to determine if additional mitigation measures would be necessary to reduce these potential impacts to less than significant. • The potential impacts with the greatest potential adverse effects on humans and human health include air quality and traffic and transportation. Mitigation measures that address potential impacts would reduce impacts to humans to less than significant.
Contribution to cumulative impacts	LTSM	
Substantial adverse effects on human beings.	LTSM	

Note: PS = Potentially significant; LTSM = Less than Significant with Mitigation Incorporation; LTS = Less than Significant; NI = No Impact.

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Appendix B: Letter of Concurrence from the U.S. Fish and Wildlife Service

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Suite W-2605
Sacramento, California 95825-1846

In Reply Refer to:
08ESMF00-
2016-I-1109

APR 05 2016

Trevor Cleak
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Subject: Informal Consultation on the West Bay Sanitary District Recycled Water Project – Sharon Heights Project in the City of Menlo Park, San Mateo County, California (Clean Water State Revolving Fund (CWSRF) No. C-06-8163-110)

Dear Mr. Cleak:

This letter responds to the State Water Resources Control Board's (State Water Board) February 17, 2016, letter requesting informal consultation with the U.S. Fish and Wildlife Service (Service) on the proposed West Bay Sanitary District (WBSD) Recycled Water Project – Sharon Heights Project (proposed project) in the City of Menlo Park, San Mateo County, California (CWSRF No. C-06-8163-110). Your request was received by the Service on February 22, 2016. At issue are the proposed project's effects on the federally threatened California red-legged frog (*Rana draytonii*), threatened Central California Distinct Population Segment of the California tiger salamander (Central California tiger salamander) (*Ambystoma californiense*), and endangered San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). This response is provided under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (Act), and in accordance with the implementing regulations pertaining to interagency cooperation (50 CFR 402). Critical habitat has been designated for the California red-legged frog and Central California tiger salamander but does not occur within the action area for the proposed project.

The Federal action on which we are consulting is the U.S. Environmental Protection Agency (USEPA) providing Federal funding to the WBSD for the proposed project through the CWSRF Program. The CWSRF Program is administered by the States under Title VI of the Federal Clean Water Act; in California, the State Water Board administers the CWSRF Program. Under CWSRF implementing regulations, an Operating Agreement establishes the roles and responsibilities for the USEPA and the States for administering the CWSRF Program. The Operating Agreement for the California CWSRF Program includes Act Section 7 guidelines for federally-assisted projects, whereby the State Water Board generally acts as the designated non-Federal representative for conducting informal consultations. Pursuant to 50 CFR 402.12(j), you submitted a biological assessment for our review and requested concurrence with the findings presented therein. These findings conclude that the proposed project may affect, but is not likely to adversely affect the California red-legged frog, Central California tiger salamander, and San Francisco garter snake.

Description of the Proposed Project

The proposed project is located primarily within the City of Menlo Park, east of Interstate 280, within the Sharon Heights Golf Club and Country Club and along Sand Hill Road between its intersection with Oak Avenue on the east and Interstate 280 on the west.

WBSD proposes to provide recycled water to the Sharon Heights Golf and Country Club as well as other local users in the WBSD service area. Components of the proposed project include wastewater supply conveyance, treatment plant, discharge pipelines, and pump stations. The pump station and force main would convey raw wastewater from the collection system main at the intersection of Sand Hill Road and Oak Avenue to the gold course, including pipeline installation within a 3.25-mile corridor in existing roadways, parking lots, and the Sharon Heights Golf and Country Club. The wastewater treatment plant will be constructed immediately adjacent to an existing retention pond on the southern edge of the Sharon Heights Golf and Country Club. Solid wastes from the treatment plant would be discharged through 1,600 feet of pipeline to be constructed from the plant to an existing sewer on the far side of the golf course.

The pipeline installation will use standard open-cut trenching techniques, except where necessary to avoid surface features. The solids discharge pipeline will be constructed on Sharon Heights Golf and Country Club property. The wastewater conveyance pipeline and recycled water pipeline to Stanford Linear Accelerator Center will be constructed on public roadways owned by the City of Menlo Park. Staging areas will be established along the route where space is available, such as vacant lots, roadway turnouts, and parking lots.

Construction of the treatment plant and pump station will include the adjacent recycled water pump station and will involve site preparation activities such as clearing and grubbing. Approximately 11,000 cubic yards of soil for the treatment plant and 20 cubic yards of soil for the pump station will be excavated in preparation for the new facilities' construction.

Avoidance and Minimization Measures

WBSD will implement the following avoidance and minimization measures to avoid and minimize the effects of the proposed project on the California red-legged frog, Central California tiger salamander, and San Francisco garter snake:

1. Prior to start of proposed project activities, a qualified biologist shall prepare and administer a Worker Awareness Program training to familiarize all personnel conducting proposed project activities with the identification and life-history of the California red-legged frog, Central California tiger salamander, and San Francisco garter snake.

2. Initial ground disturbing activities and any work associated with the proposed project shall be conducted between May 1 and October 1 during dry weather conditions to minimize the potential for encountering California red-legged frogs and Central California tiger salamanders. Work shall be restricted to daylight hours.

3. If construction must occur between November 1 and April 30, the qualified biologist shall conduct a pre-activity clearance sweep prior to start of proposed project activities within 48 hours after any rain events of 0.1 inch or greater or if wet conditions are present on-site.
4. A qualified biologist shall conduct a survey of the proposed project area within 48 hours prior to initial ground disturbing activities. The survey area shall include all potential suitable upland habitat in the proposed project area and suitable aquatic habitat and upland habitat

located within 100 feet of the proposed project area. The survey shall also include identifying all mammal burrows in the proposed project area that are suitable for California red-legged frogs, Central California tiger salamanders, and San Francisco garter snakes. If any life stage of a California red-legged frog, Central California tiger salamander, or San Francisco garter snake is found within the survey area, the biologist shall revisit the site on subsequent days to determine if the California red-legged frog, Central California tiger salamander, or San Francisco garter snake has left the site. If the California red-legged frog, Central California tiger salamander, or San Francisco garter snake has not left the site after three days, the Service (for California red-legged frog, Central California tiger salamander, and San Francisco garter snake) and California Department of Fish and Wildlife (for Central California tiger salamander and San Francisco garter snake) shall be consulted to determine the appropriate course of action.

5. If a California red-legged frog, Central California tiger salamander, or San Francisco garter snake is encountered, all activities within 100 feet of the amphibian or snake shall cease until appropriate corrective measures have been completed, or it has been determined that the amphibian or snake will not be harmed. Reports of any California red-legged frog, Central California tiger salamander, or San Francisco garter snake sightings and any proposed project-related incidental take shall be reported to the Service immediately by telephone.

6. All work areas within 25 feet of suitable aquatic habitat shall be flagged for monitoring during construction activity.

7. A qualified biologist shall be present on-site during initial ground disturbance in portions of the proposed project area that are within 25 feet of potential California red-legged frog, Central California tiger salamander, or San Francisco garter snake aquatic habitat.

8. All trash shall be removed from the site daily and disposed of properly to avoid attracting potential predators to the site.

9. No pets shall be permitted on-site during proposed project activities.

10. All vehicles shall be in good working condition and free of leaks. All leaks shall be contained and cleaned up immediately to reduce the potential for soil or vegetation contamination.

11. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from riparian habitat or water bodies and in a location from where a spill would not drain directly toward aquatic habitat (*e.g.*, on a slope that drains away from the water).

12. The number of access routes, size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the proposed project goals.

13. To ensure that diseases are not conveyed between work sites by the qualified biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force shall be followed at all times (http://www.fws.gov/ventura/docs/species/protocols/DAFTA.pdf).

14. No herbicides will be used on-site.

15. All open trenches greater than 6 inches deep will be covered overnight and/or escape ramps provided.

Habitats within the Action Area

The proposed project site is situated in a developed, urban landscape with developed and ruderal habitats and is primarily bordered by developed areas. Most of the proposed project site is located in Sand Hill Road and other existing paved roads. Unpaved portions of the propose project site include golf course turf at the Sharon Heights Golf and Country Club, ornamental landscaping, and disturbed ruderal areas. The northeastern end of the proposed project site is approximately 28 feet west of San Francisquito Creek. An artificial pond and a detention basin at the Sharon Heights Golf and Country Club are located in the vicinity of the proposed project site. Remnant coast live oak and valley oak stands are also located adjacent to the proposed project site.

Conclusion

The Service concurs that the proposed project is not likely to adversely affect the California red-legged frog, Central California tiger salamander, and San Francisco garter snake because: (1) no suitable aquatic habitat for these listed species will be disturbed; (2) construction activities will be primarily limited to existing roadways and other developed or disturbed areas; (3) work will be limited to dry periods and the daytime when California red-legged frogs and Central California tiger salamanders are less likely to disperse through the proposed project area; (4) a qualified biologist will conduct pre-construction surveys and monitor initial ground disturbing activities; (5) a qualified biologist will provide training for proposed project workers in the identification of the California red-legged frog, Central California tiger salamander, and San Francisco garter snake and their habitats and the avoidance and minimization measures; (6) all work will stop if a California red-legged frog, Central California tiger salamander, or San Francisco garter snake is observed within 100 feet of proposed project activities; (7) all trenches will be covered overnight and/or escape ramps provided; and (8) the implementation of water quality best management practices will minimize the potential for degradation or contamination of aquatic habitat near the action area.

Therefore, unless new information reveals effects of the proposed project that may affect listed species in a manner or to an extent not considered, or a new species is listed, no further action pursuant to the Act is necessary for the proposed project. If you have any questions regarding this letter, please contact Joseph Terry, Senior Biologist, or Ryan Olah, Coast/Bay Division Chief, at the letterhead address, telephone (916) 943-6721, or electronic mail (joseph_terry@fws.gov or ryan_olah@fws.gov).

Sincerely,

Ryan Olah
Chief, Coast/Bay Division

cc:
Randi Adair, California Department of Fish and Wildlife, Napa, California Josh Amaris, U.S. Environmental Protection Agency, San Francisco, California

Appendix C: USFWS IPaC List

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To: November 06, 2017
Consultation Code: 08ESMF00-2018-SLI-0340
Event Code: 08ESMF00-2018-E-00908
Project Name: West Bay Sanitary District

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to

utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

Project Summary

Consultation Code: 08ESMF00-2018-SLI-0340

Event Code: 08ESMF00-2018-E-00908

Project Name: West Bay Sanitary District

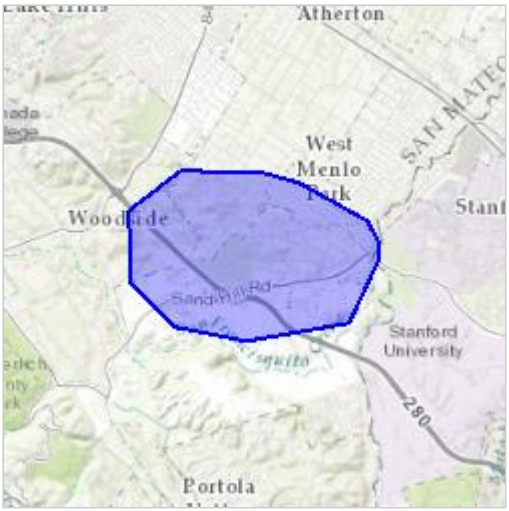
Project Type: WASTEWATER PIPELINE

Project Description: Recycled Water Project

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/37.42504673072411N122.2151749416621W

E-1



Counties: San Mateo, CA | Santa Clara, CA

Endangered Species Act Species

There is a total of 17 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

Mammals

NAME	STATUS
Salt Marsh Harvest Mouse *Reithrodontomys raviventris*	Endangered

No critical habitat has been designated for this species.

Species profile: https://ecos.fws.gov/ecp/species/613

Birds

NAME	STATUS
California Clapper Rail *Rallus longirostris obsoletus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4240	Endangered
California Least Tern *Sterna antillarum browni* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Marbled Murrelet *Brachyramphus marmoratus* Population: U.S.A. (CA, OR, WA) There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4467	Threatened
Western Snowy Plover *Charadrius alexandrinus nivosus* Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8035	Threatened
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **proposed** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Green Sea Turtle *Chelonia mydas* Population: East Pacific DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6199	Threatened
San Francisco Garter Snake *Thamnophis sirtalis tetrataenia* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5956	Endangered

Amphibians

NAME	STATUS
California Red-legged Frog *Rana draytonii*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/2891

California Tiger Salamander *Ambystoma californiense*	Threatened

Population: U.S.A. (Central CA DPS)
There is **final** critical habitat for this species. Your location is outside the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/2076

Fishes

NAME	STATUS
Delta Smelt *Hypomesus transpacificus*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/321

Insects

NAME	STATUS
Bay Checkerspot Butterfly *Euphydryas editha bayensis*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/2320

San Bruno Elfin Butterfly *Callophrys mossii bayensis*	Endangered

There is **proposed** critical habitat for this species. The location of the critical habitat is not available.

Species profile: https://ecos.fws.gov/ecp/species/3394

Flowering Plants

NAME	STATUS
Fountain Thistle *Cirsium fontinale var. fontinale*	Endangered
No critical habitat has been designated for this species.	
Species profile: https://ecos.fws.gov/ecp/species/7939	
Marin Dwarf-flax *Hesperolinon congestum*	Threatened
No critical habitat has been designated for this species.	
Species profile: https://ecos.fws.gov/ecp/species/5363	
San Mateo Thornmint *Acanthomintha obovata ssp. duttonii*	Endangered
No critical habitat has been designated for this species.	
Species profile: https://ecos.fws.gov/ecp/species/2038	
Showy Indian Clover *Trifolium amoenum*	Endangered
No critical habitat has been designated for this species.	
Species profile: https://ecos.fws.gov/ecp/species/6459	

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Appendix D: National Historic Preservation Act, Section 106 Concurrence

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

May 25, 2017

Reply to: BUR_2017_0427_001

Ms. Anastasia T. Leigh, Regional Environmental Officer
U.S. Bureau of Reclamation, Mid-Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825-1898

Subject: Section 106 Consultation for the Sharon Heights Satellite Treatment Facility Project, West Bay Sanitary District (WBSD), San Mateo County, California (Project # 17-MPRO-086)

Dear Ms. Leigh:

Reclamation is initiating consultation in accordance with Section 106 as amended, and its implementing regulations that are found at 36 CFR Part 800. Reclamation proposes to issue a grant, via the Title XVI Water Reclamation and Reuse Program, to WBSD for their Sharon Heights Satellite Treatment Facility Project in San Mateo County, California. The State Water Resources Control Board (SWRCB), which is also providing partial grant funding for this project, previously consulted with the OHP for a finding of no historic properties affected for that undertaking (Enclosure 2: Office of Historic Preservation letter: September 8, 2016). Pursuant to 36 CFR 800.4(d)(1) Reclamation has determined a finding of no historic properties affected for this undertaking and requests concurrence. Documents included with the submittal are:

- *Enclosure 1: Figure 1: Area of Potential Effects*
- *Enclosure 2: Previous SHPO Consultation with SWRCB [September 08, 2016]*
- *Enclosure 3: West Bay Sanitary District Recycled Water Project-Sharon Heights: Phase I Cultural Resources Study; October 15, 2015 [By: B. Campbell, H. Haas & K. Brudvik, Rincon Consultants, Oakland, CA][For: RMC Water & Environment, San Diego, CA]*
- *Enclosure 4: Cultural Resources Inventory Letter Report: Extended Phase 1 (XPI) Archaeological Survey (By: K. Hunt & D.V. Pluym) (Rincon: June 24, 2016)*

The WBSD proposes to treat wastewater for reuse within their overall service district by constructing a new satellite treatment plant, pump station, and about 3.25 miles of pipeline located within rights-of-way along Sand Hill Road. The facility will be about 150 feet by 300 feet within an area of about one acre sited in the southwest area of the Sharon Heights Golf Course and Country Club (SHGC&CC). The pump station will have a 200-square-foot footprint and will convey raw wastewater from a main at Sand Hill Road and Oak Avenue to the SHGC&CC. Phase 1 of the pipelines will be about 5,300 feet of 6-inch PVC pipe to deliver recycled water to the Stanford Linear Accelerator Center. Phase 2 will need about 6,340 feet of 6-inch PVC pipe to send recycled water to Rosewood Sand Hill, Sand Hill Commons, and Sharon Land Company.

The area of potential effects (APE) contains the components described above (also in Figure 1). The APE is in an area containing residential and commercial buildings along Sand Hill Road and the SHGC&CC. The vertical APE includes required excavation depths of about 5.25 feet for the 3.25 miles of pipelines, 4 to 6 feet for the pump station, and 20 feet for the satellite treatment plant. Staging will occur in developed areas.

On behalf of Reclamation, SBWD contracted with Rincon Consultants for a cultural resources survey report (dated October 15, 2015), and a letter report for the Extended Phase I (XPI) archaeological

survey (dated June 24, 2016). The record review identified no cultural resources as being located with the APE, but identified 47 previous cultural resource surveys that had been conducted within the 0.5-mile study radius for the APE. Results indicate eight (8) cultural resources were previously recorded, none of which are located within the APE but several were found nearby. A pedestrian survey was done by Mr. Brudvik (April 20, 2015) with negative results for new resources.

One previously recorded prehistoric site, P-43-000581 (CA-SCL-586), is adjacent to the eastern margin of the proposed location of the pump station at the intersection of Sand Hill Road and Oak Avenue. During excavation of this previously recorded and investigated site an inhumation was recovered at about 10 feet beyond the APE boundary. Based on the previously documented sub-surface sensitivity of the area, geotechnical coring was then planned for, and conducted, to examine the sub-surface components for possible intact information bearing deposits. Results of the testing are negative for any discernable intact buried deposits (Rincon Letter Report 2016: pg. 2).

Reclamation contacted the Indian Canyon Mutsun Band of Costanoan, the Ohlone Indian Tribe, and the Trina Marine Ruano Family, identified as Native American organizations likely to have knowledge or concerns with historic properties in the area, requesting their assistance in identifying historic properties which may be affected by the proposed undertaking pursuant to 36 CFR § 800.4(a)(3). To date, Reclamation has not received a response from these tribes or organizations. Should any Native American concerns be subsequently raised, Reclamation will work to address them and make notifications as required.

Based on the above discussion and the enclosed information, Reclamation has reached a finding of no historic properties affected for the current undertaking and seeks comment on its delineation of the APE, efforts to identify historic properties in the APE and for its finding.

After reviewing the information submitted, the following comments are offered:

- Pursuant to 36 CFR 800.4(a)(1) and 800.16(d), there are no objections to the APE as defined;
- Pursuant to 36 CFR 800.4(b), Reclamation has documented a reasonable and good faith effort to identify historic properties within the area of potential effects.
- I recommend that the provisions in 36 CFR 800.13 (b) be followed, including all required notifications, in the unlikely event of any inadvertent post-review discoveries;
- Although Reclamation has determined that no historic properties will be affected by the proposed project, I do not believe that is the appropriate determination. Based on the information provided, I consider that the appropriate determination is that no historic properties will be adversely affected for this proposed undertaking;
- Pursuant to 36 CFR 800.5(b), I **find that effects to the Sharon Heights Satellite Treatment Facility Project, West Bay Sanitary District (WBSD), San Mateo County, CA. (Project # 17-MPRO-086) will be less than adverse.**

Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800 (as amended). Should you require further information, please contact Jeanette Schulz at Jeanette.Schulz@parks.ca.gov or (916) 445-7031.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Appendix E: ITA Concurrence

Indian Trust Assets Request Form
(MP Region)

Submit your request to your office's ITA designee or to MP-400, attention Kevin Clancy.

Date: 11/6/17

Requested by (office / program)	MP-700, Planning Division/Title XVI
Fund	XXXR0680R1
WBS	RR.17529652.MP70014
Fund Cost Center	RR02030000
Region # (if other than MP)	N/A
Project Name	Environmental Assessment for the West Bay Sanitary District Recycled Water Project at Sharon Heights
CEC or EA Number	17-33-MP
Project Description (attach additional sheets if needed and include photos if appropriate)	The proposed project consists of a satellite wastewater treatment plant on the Sharon Heights Golf & Country Club) property, an influent supply pipeline under Sand Hill Road, a pump station for the influent supply, recycled water distribution pipeline to the SLAC National Accelerator Laboratory and the golf course irrigation system, and a solids discharge pipeline to the existing sewer system. The project would allow the West Bay Sanitary District to treat water for reuse within the service district to meet customer demands. Waste sludge and washwater produced by the treatment process would be conveyed via a new discharge pipeline to the existing sewer system. See maps from the Initial Study (attached).

***Project Location (Township, Range, Section, e.g., T12 R5E S10, or Lat/Long cords, DD-MM-SS or**	Proposed Satellite Treatment Plant Site 37-25-16.99N, 122-13-02.13W Proposed pipelines from 37-25-20.88N, 122-13-11.34W to 37-25-11.20N, 122-12-55.35W to 37-25-34.10N, 122-11-31.35W

Signature	Printed name of approver	Date
Vanessa Emerzian	Vanessa Emerzian	11/6/17

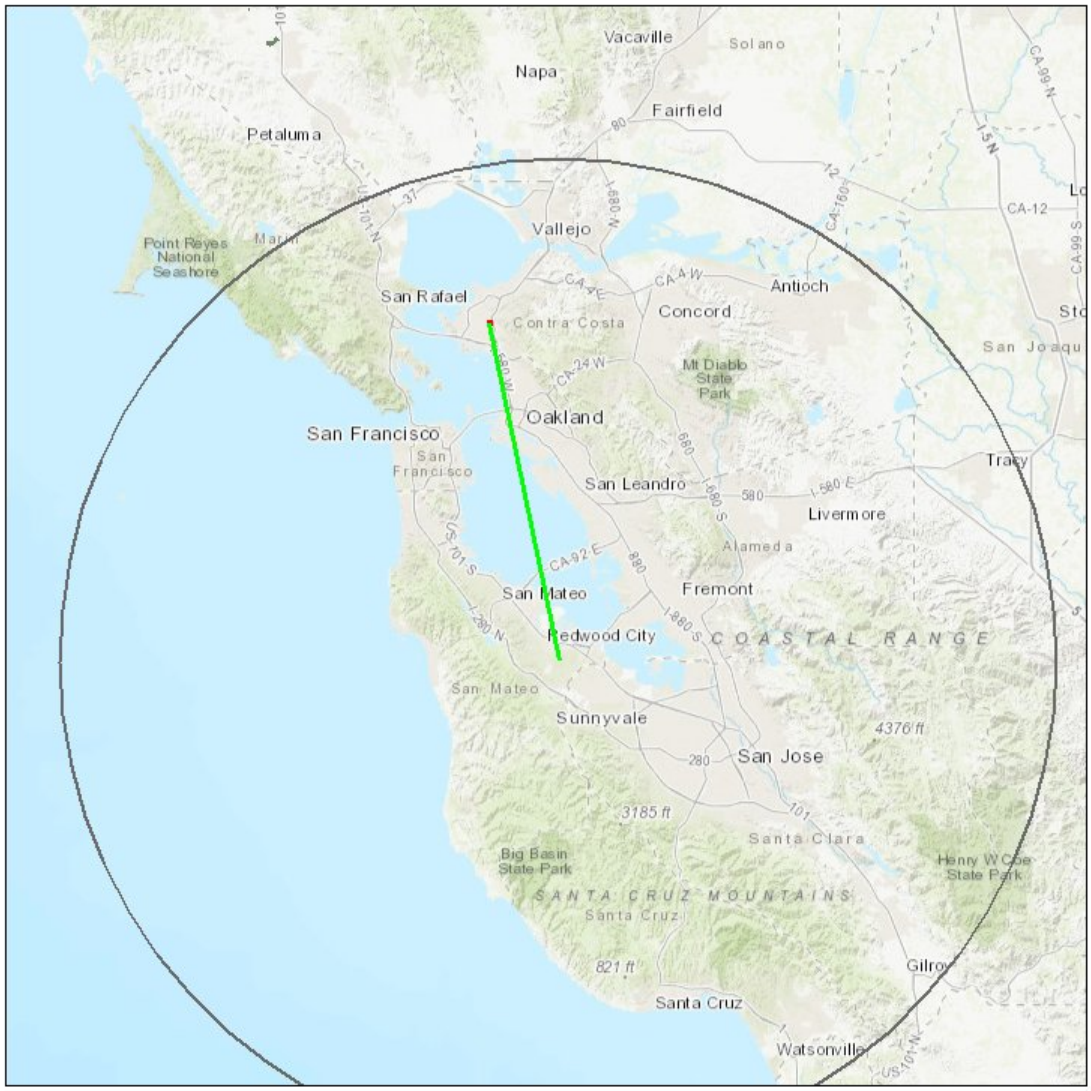
ITA Determination:

The closest ITA to the Proposed Action is Lytton Rancheria which is about 34.36 miles to the North. (See attached image).

Based on the nature of the planned work it does not appear be in an area that will impact Indian hunting or fishing resources or water rights nor is the proposed activity on actual Indian lands. It is reasonable to assume that the proposed action will not have any impacts on ITAs.

Signature	Printed name of approver	Date
K. Clancy	Kevin Clancy	11/7/2017

Westbay Sanitary District



Native American Lands FL

PDA

Rancheria

0 5 10 20 Miles

RECLAMATION
Managing Water in the West