

# Bayshore Sanitary District

36 INDUSTRIAL WAY  
BRISBANE, CALIFORNIA 94005  
(415) 467-1144

BOARD OF DIRECTORS:  
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RICH LANDI, MAINTENANCE DIRECTOR  
TOM YEAGER, DISTRICT ENGINEER

03 March 2020

Mr. John Swiecki  
Community Development Director  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005

Re: Brisbane Baylands, Specific Plan EIR  
Scope and Content

Dear Ken:

This letter is in response to your request for comments on the scope and content of the Specific Plan EIR for Brisbane Baylands.

The District has offered various comments on previous documents for this project. Attached are our comments on the Program EIR for this project. These comments and the responses to them should be included in this Specific Plan EIR and in future environmental documents.

This Specific Plan EIR must address the issue of wastewater treatment and disposal in greater. Specifically, an Appendix addressing wastewater should be developed to the appropriate detail similar to that which will be contained in the appendix addressing water.

Previous documents have addressed wastewater in very general terms. This Specific Plan EIR needs to evaluate the environmental impacts of various treatment and disposal options as different options will have different environmental impacts. This EIR should evaluate the environmental impact of

- Various treatment alternatives
- Various effluent disposal alternatives
- Staging alternatives

Treatment alternatives need to be evaluated with respect to the options available for solids and liquid handling and their energy impacts and their ability to reliably produce the high-quality effluent for various reuse options. It is not necessary to select a process, but it is necessary to identify feasible options and their impacts. This would eventually be used as part of the final decision-making process.

This project has proposed a zero discharge for the wastewater effluent. This means that the treated effluent would be disposed of on-site or on nearby sites through irrigation on a year-round basis. Other reuse options may also be feasible. A year-round water balance must be developed in order to define the irrigation land area require, both on-site and off-site, and the winter storage volumes and required storage facilities. If other reuse options are proposed than the volume diverted to these options must be defined. If diversion of a portion of the flow to the SFPUC facilities that must be identified.



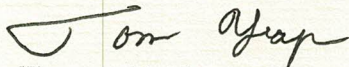
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It is to be noted that the District has 20 years of rainfall data that has been collected at the Carlyle Pump Station on Industrial Way at the project boundary.

Preliminary discussions have been held with UPC regarding the use of District facilities for initial stages of project development until such a time as there is enough wastewater volume to support a new wastewater plant. No conceptual plans have been present so the impact on District facilities is unknown. Various proposals, if any, need to be presented so that the appropriate evaluation of the District assets can be undertaken.

These are our initial thoughts on what this Appendix should include. We would like to review the scope of this appendix as it is further developed.

Very truly yours,  
BAYSHORE SANITARY DISTRICT



Thomas E. Yeager  
District Engineer

cc: Joann Landi - Bayshore Sanitary District  
Iris Gallagher - Board President  
Lauren Quinn - District Legal Counsel



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TOM YEAGER, DISTRICT ENGINEER

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OCT 03 2013

Comm. Dev. Dept. Brisbane

2 October 2013

John Swiecki, AICP, Community Development Director  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005

Subject: Brisbane Baylands DEIR

Dear Mr. Swiecki:

The Board and staff of the Bayshore Sanitary District have reviewed the Draft Environmental Impact Report (DEIR) for this project. This letter contains our comments.

It is our understanding that this DEIR was prepared to evaluate the 4 development options and that other environmental documents will be prepared for future projects and for future planning and administrative actions. Therefore we are restricting our comments to the immediate planning horizon.

The District was contacted by the DEIR consultant team to obtain factual information regarding the District and this information was provided. However, the District was not contacted regarding the potential use of District facilities in the short-term. The conclusion was reached in the DEIR that the impact to the District would be Less Than Significant (LST). We do not understand how that determination was made given the fact that the District was not contacted regarding use of District facilities in the short term. By short term, the District means use of District collection and pumping facilities until such time as a reclaimed wastewater treatment facility is constructed to serve the project. According to the DEIR this short-term period could be up to 15 years.

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The District initiated a meeting with Universal Paragon Corporation (UPC) in order to gain a better understanding regarding how this development might impact the District's facilities especially in the 15-year short term period. Present at this meeting were:

- Rich Landi, Maintenance Director Bayshore Sanitary District
- Tom Yeager, District Engineer
- Jonathan Scharfman, UPC General Manager/Development Director
- Howard Peirce, Project Manager
- Chan Pong Ng, Board Advisor

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This was a very fruitful meeting and we gained a better understanding regarding the development of this project and how the District's facilities may be impacted.

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The DEIR states that certain District sewer lines serving existing customers along Tunnel Avenue and Industrial Way would be replaced and constructed to District standards. However, no mention was made regarding the use of the District's Carlyle Pump Station (PS) and associated force main.

At this meeting UPC indicated that the initial developments would occur at the intersection of Geneva Avenue and Bayshore Boulevard and that UPC would like to deliver wastewater to the Carlyle PS to be pumped to San Francisco. Currently all discharges along Bayshore Boulevard and Industrial Way are pumped to San Francisco while all discharges along Tunnel Avenue flow by gravity to San Francisco.

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The Carlyle PS contains 4 pumps. During dry weather periods only one pump operates at a time. However, during wet weather periods multiple pumps operate. It is not uncommon to have 2 pumps operating. On rare occasions 3 or 4 pumps will operate, but only for short periods of time. To increase the capacity of the Carlyle PS it will be necessary to either install larger pumps that operate at a higher head (pressure) or construct a larger parallel force main to reduce the total pumping head. The District is reluctant to pursue the first option as that would increase the operating pressure on the 43-year old asbestos cement (AC) force main. The District has recently evaluated the second option.

The District believes that with careful early planning there would be a less than significant impact to District facilities provided certain conditions are met. These include:

- The District is included early in all planning activities and is consulted as projects are developed
- All District wastewater collection lines replaced are replaced to District Standards which may need to be revised due to the unique soil conditions at the site
- A requirement that the Developer grants the District an easement in a public right-of-way for a parallel force main and the Developer construct at its expense a parallel force main and any associated improvements at the Carlyle Pump Station at the same time as the roadways and prior to any paving. The developer will receive credit against the developer's capacity charge obligations based on the value of construction in an amount to be determined by the District.
- The District ordinance must be adhered to, especially with regard to connection (entitlement) fees.

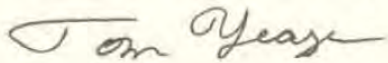
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Please insure that these comments are passed on to the DEIR consultant and addressed in the Final EIR.

Very truly yours,

BAYSHORE SANITARY DISTRICT



Thomas E. Yeager  
Kennedy/Jenks Consultants  
District Engineer

cc: Joann Landi, BSD  
John Bakker, District Legal Counsel

## 2.7 Individual Responses to Comments from Special Districts

### 2.7.1 Bayshore Sanitary District

**BSD-1** [See page 5-39 for the original comment] Draft EIR page 4.O-46 sets the stage for the analysis leading to the following conclusion on page 4.O-47:

Based on existing and projected wastewater flows from the BSD and the City to the SFPUC, development of the Project Site with or without the onsite recycled water plant would not exceed either the BSD's or the City's contractual capacity for wastewater treatment by the SFPUC. Further, the Recology site wastewater discharge to the SFPUC would only increase by approximately 0.002 mgd. Therefore, adequate treatment capacity at the SFPUC would be available for wastewater generated within the Project Site, and impacts would be less than significant.

Wastewater generated by development within the Project Site is proposed to be discharged into the BSD system for treatment at the SFPUC SEP. Midway through the Project Site development buildout (about year 15), an onsite recycled water plant would be constructed to produce recycled water to meet non-potable water needs on the Project Site and reduce potable water demand. The recycled water plant would therefore reduce the liquid wastewater flows requiring offset conveyance and treatment. Adequate conveyance and treatment capacity are available in the BSD and SFPUC SEP systems under existing contract arrangements to handle wastewater flows from Project Site development. As a result, wastewater flows from Project Site development would be properly treated and disposed of through facilities that comply with SFRWQCB wastewater treatment requirements and impacts would be less than significant.

**BSD-2** [See page 5-40 for the original comment] This comment refers to a meeting held between the District and the applicant for the DSP and DSP-V scenarios, and does not raise any significant environmental issues regarding the Draft EIR or its analyses and conclusions.

**BSD-3** [See page 5-40 for the original comment] This comment refers to options for future use of the District's Carlyle pumping station as part of future site development within the Baylands, and expresses the District's preference for one of the two options discussed between the District and the applicant for the DSP and DSP-V scenarios. See Response BSD-4.

**BSD-4**

[See page 5-40 for the original comment] The City concurs that there would be a less-than-significant impact in relation to wastewater systems resulting from proposed Baylands development. Subsequent planning and design for a selected development scenario would include coordination between the City, the applicant(s), and the BSD to satisfactorily address the specific conditions listed in Comment BSD-4. Because wastewater facilities within the Bayshore Sanitary District would be required to meet the BSD's requirements, each of the requirements set forth in Comment BSD-4 would be incorporated into Baylands development requirements as part of the planning review being undertaken by the City for the Baylands. See the MMRP in Chapter 4.0 of the Final EIR for information on implementation of mitigation measures and agency requests submitted in response to the Draft EIR.