

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT
STAFF: Habte Kifle
MEETING DATE: March 11, 2009

ITEM: 5 C

SUBJECT: **CITY COUNTY OF SAN FRANCISCO, SAN FRANCISCO
INTERNATIONAL AIRPORT, SAN MATEO COUNTY** - Amendment of
Waste Discharge Requirements Order No. 99-037 to Adopt Wetland Mitigation
Alternatives

CHRONOLOGY: May 1999 – Water Board issued Waste Discharge Requirements (WDRs)
February 1997 – Water Board adopted Certification Resolution

DISCUSSION: The Revised Tentative Order (Appendix A) will require San Francisco
International Airport to implement the alternative wetland mitigation projects as
identified below. These projects fully address a 17.3-acre shortfall in the
implementation of wetland mitigation required under the Airport's current WDRs:

- Fund, in the amount of \$4 million, the creation of 12 acres of tidal salt marsh at the California State Parks Foundation's Yosemite Slough Restoration Project, which is adjacent to Hunters Point in San Francisco;
- Purchase 5.8 acres of wetland credits for tidal salt marsh creation at Deepwater Slough Island in Redwood City from Starwood Capital Group, for a total amount of \$3.19 million; and,
- Fund Arc Ecology of San Francisco in the amount of \$500,000 to complete planning and environmental studies for the proposed Hunters Point Waterfront Park, including studies for its proposed Stormwater Treatment Wetland Project.

In 1999, the Board adopted WDRs that permitted the Airport to fill and mitigate for a total of 31.21 acres of jurisdictional wetlands and open water associated with its Master Plan and airfield safety improvements (projects). The 1999 WDRs consolidated the projects' wetland mitigation requirements from both of the Airport's 1997 and 1999 projects, and required the Airport to create a total of 86.1 acres of mitigation wetlands.

Since 1999, the Airport has successfully created 68.8 acres of wetlands, leaving it with a net shortfall of 17.3 acres of seasonal wetlands to comply with the 1999 Order. Of this shortfall, 18 acres of wetlands were to be created at the former Hunters Point Naval Station in San Francisco. However, the ongoing, but unfinished, site cleanup efforts there continue to preclude the property transfer of

the areas where the wetland creation would occur from the Navy to the City and County of San Francisco. This precludes the wetland creation at Hunters Point. Site design constraints at three other sites where the Airport was required to create wetlands resulted in the creation of 4 acres less mitigation than required. The Revised Tentative Order credits the Airport for its creation of 4.7 wetland acres more than initially required at the Bair Island mitigation site, leaving a net shortfall of 17.3 acres.

The Airport has completed all other wetland mitigation requirements of the 1999 Order, including enhancement of about 444 acres of tidal salt marshes at Outer Bair Island, its “West-of-Bayshore” property, and the Oliver Brothers/Hayward Marsh. The Airport had also funded the California State Parks Foundation in the amount of \$500,000 to complete a water quality improvement feasibility study at Candlestick Point Recreation Area and Yosemite Slough.

Staff believes that the Airport has worked diligently to meet its mitigation requirements and to identify alternative wetland mitigation projects, given the infeasibility of the Hunters Point parcels and constraints at other sites. The 5.8 acres of proposed Redwood City mitigation wetlands were constructed at approximately the same time (2000) as the first 3 acres were required to be constructed at Hunters Point. Combined with the upcoming construction of the 12 acres of wetlands at Yosemite Slough and their proximity to the impact area, staff believes the Revised Tentative Order’s requirements will ensure that the Airport implements alternative wetland mitigation in an amount appropriate to address all timing and location changes since adoption of the 1999 Order.

The originally circulated tentative order was revised in response to comments by the Airport (Appendix B). The revision allows the Airport to complete its payment for the 5.8 acres of wetlands credits in Redwood City by the end of this calendar year, which does not change the date these already-constructed wetlands were created. The tentative order was also revised to reflect that the Airport does not own the Redwood City wetlands. We anticipate no additional comments or testimony and expect this item to remain uncontested.

RECOMMEN-
DATION: Approval of the Revised Tentative Order

FILE No. 2178.07 (HTK)

APPENDICES: A: Revised Tentative Order
B: Airport’s Comments