

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION**

**ORDER NO. R2-2013-**

**REVISED SITE CLEANUP REQUIREMENTS and RESCISSION OF ORDER NO.  
94-017**

**FOR**

**PACIFIC ROD AND GUN CLUB  
AND  
THE CITY AND COUNTY OF SAN FRANCISCO  
SAN FRANCISCO PUBLIC UTILITIES COMMISSION  
525 GOLDEN GATE AVENUE  
SAN FRANCISCO, CA 94102**

## **FINDINGS**

The California Regional Water Quality Control Board, San Francisco Bay Region, hereinafter called the Regional Water Board, finds that:

### **SITE DESCRIPTION**

1. The Pacific Rod and Gun Club (the Club) is a public recreation facility located on the west side of Lake Merced in San Francisco (see Figure 1). The Club occupies approximately 10 acres of land that is leased from the City and County of San Francisco. The San Francisco Public Utilities Commission (the SFPUC), a public agency which is part of the City and County of San Francisco, currently has jurisdiction over Lake Merced. The Club built and maintains facilities at the Site, including skeet and trap ranges where shotguns are used to shoot pellets at clay targets. The Club has operated the facilities and the ranges at the current location since 1934. The facilities are used daily, and the ranges are currently in operation three days a week. For the purposes of this Order, the Club and the SFPUC are jointly considered the Dischargers.

### **PURPOSE OF ORDER**

2. Pursuant to California Water Code (CWC) section 13304, this Order requires that site investigations and corrective measures be performed, as necessary, to address soil contamination in portions of the site. This Order requires the Dischargers to submit plans to remediate soil and sediment to meet human health and ecological risk standards for current and reasonably foreseeable future land uses. This Order also supersedes and rescinds a previous Order (No. 94-017) because the requirements in that Order have been fully implemented.

### **SITE CONTAMINATION**

3. From 1934 until 1994, Club members and the general public discharged lead pellets from shotguns in a northeasterly direction toward Lake Merced (Lake), a fresh water lake that was last used for potable water purposes in 1929 and is currently classified as an emergency nonpotable water supply by the SFPUC. Since 1994, Club members and the general public have exclusively used steel shot in trap and skeet activities. The pellets generally travelled 300 to 400 feet from the shooting positions, with a significant percentage incidentally deposited into the Lake. Based on the number of shells fired in 1989, an estimate of the amount of lead falling into the Lake was about 27 tons per year. Lead has been successfully removed from the Lake on at least one occasion. During a cleanup dredging effort in 1985-1986, the City removed 128 tons of lead pellets and larger fragments from the Lake.
4. Broken clay targets are also incidentally deposited into the Lake and adjoining upland areas between the ranges and the Lake. Prior to 2000, clay targets manufactured using asphaltic materials or petroleum pitch (typically containing poly-aromatic hydrocarbons (PAHs)) were used at the Site. Fragments of these targets can be found in the soil at the Site between

the ranges and the Lake. Other asphaltic materials, with PAHs, have been detected in soils on other parts of the Site upwind of the ranges and the Lake. Clay targets used since 2000 do not contain petroleum pitch and are designed to be biodegradable.

5. The two primary environmental threats at the Site are lead pellets and clay target debris incidentally deposited into the Lake and environs. The potential damages and effects of lead released at trap and skeet facilities are well documented. Direct ingestion of lead pellets and fragments may cause waterfowl deaths. In the Lake Merced area, dabbling ducks are considered the most sensitive receptor with regards to ecologic risk. In both fresh and marine water, lead becomes available to biota through the transformation process of oxidation. The lead pellets and fragments also contained small amounts of other metals such as tin, antimony and arsenic. The older clay targets formerly used at the Site contained asphaltenes, which in turn contain PAHs. Certain types of PAHs are classified as carcinogenic.

### **EARLY INVESTIGATIONS**

6. In December 1989 samples were taken of the upland soil in some areas, and of sediment and water of Lake Merced. Analytical results indicated that lead was elevated in surface soil at concentrations greater than human health guidelines (1000 mg/kg) at several locations. Lead was elevated in a single Lake sediment sample but not detected in samples of Lake water. In May 1990, a follow-up study was performed to confirm and delineate the extent of lead in sediment, and to perform bioassays of the sediment. Lead was detected in two sediment samples, and no mortality was observed to fish in the bioassay tests.
7. An investigation was conducted in 1992 to determine the extent and quantity of lead in the Lake sediments and the water column, and assess the presence of lead in biota. It was found that sediment lead concentrations, after removal of lead pellets, exceeded background levels (geometric mean of 143 vs. 39 mg/kg). Also, lead concentrations in aquatic plants (coontail and tule) and fauna (bloodworms, clams and snails) exceeded background by one order of magnitude. While benthic invertebrate fauna and other organisms in the Lake did not show signs of adverse impacts from lead, the investigation recommended additional biological study to determine whether a risk to the populations of resident and migratory waterfowl existed from ingesting lead pellets in the Lake.

### **PREVIOUS SITE CLEANUP REQUIREMENTS IN ORDER NO. 94-017**

8. On January 19, 1994, Site Cleanup Requirements Order No. 94-017 was issued to the Dischargers. The Order required the Dischargers to:
  - a. cease the deposition of lead into the waters of Lake Merced;
  - b. determine the degree to which the populations of resident and migratory waterfowl are affected by the possible ingestion of lead pellets at the site;
  - c. develop a remedial action plan, if necessary; and
  - d. implement the remedial action plan, if necessary.

9. Several requirements of the 1994 Order were implemented. In 1994, the Club prohibited the use of lead shot on the ranges (ammunition is now either steel or bismuth). When biodegradable clay targets without asphaltic materials containing PAHs became available in 2000, the Club switched to these targets on the ranges.
10. In a letter dated April 18, 1995, the Department of Fish and Game determined that, based on the limited number of waterfowl species using the Lake and on the mode of feeding observed for waterfowl, the risk of lead uptake from ingestion of lead pellets or lead-contaminated sediments by waterfowl was low. Therefore the Regional Water Board determined that the remedial action plan required by the 1994 Order was not necessary and so it was not prepared.
11. The main objectives of Order No. 94-017, to cease deposition of lead shot into Lake Merced and to evaluate and remediate risks to waterfowl as needed, have been satisfied and therefore Order No. 94-017 can be rescinded. This Order requires additional remedial actions for meeting human health standards in upland soils and further investigation and evaluation of potential risks to ecological receptors in Lake sediments, as well as remedial actions if needed.

#### **SUBSEQUENT INVESTIGATIONS AND RISK ASSESSMENT**

12. On September 23, 2005, the SFPUC submitted to the Regional Water Board the results of an investigation to evaluate whether a proposed raising of the Lake level would cause adverse human or ecological risks following the inundation of residual lead shot as well as other inorganics and PAHs. The study concluded that under current conditions, residual chemicals in soil, sediment or surface water do not pose a significant health threat to humans, but that surface sediments appear to be heavily impacted by both lead, and to a lesser extent arsenic, and localized impacts to benthic species were possible. The study suggested that lead and arsenic could be leached from freshly inundated soils at concentrations exceeding both drinking water standards and ecological benchmarks.
13. On October 19, 2007, the SFPUC submitted to the Regional Water Board the results of an investigation on the environmental risk of newly inundated lead shot and associated chemicals at the Club following the rise in water levels in the Lake by seven feet compared to the level in 2002. The study evaluated the horizontal and vertical extent of lead and arsenic concentrations in surface water as well as the potential risks associated with lead and arsenic exposure. Arsenic was not detected in the water samples. The study concluded that while there was a release of lead from inundated soils along a limited portion of the shoreline, the dissolved lead concentrations were not above drinking water standards and the surface water column did not contain dissolved lead above ecological benchmarks.
14. On April 16, 2012, the SFPUC submitted to the Regional Water Board the results of a supplemental investigation and health risk assessment for both human and ecological receptors from possible exposure to chemicals in soil, sediment and surface water. The results indicated that potential human health risks were within an acceptable risk range for

the occasional visitor or off-site resident, but for receptors with more frequent exposure, such as an onsite caretaker or a permanent worker, the PAHs, lead, and to a lesser extent arsenic in soil throughout the Site exceeded the acceptable risk range. For ecological receptors, both lead and PAHs were found to exceed probable effects levels in sediment at a majority of sampling stations, while arsenic exceeded effects levels at only a few stations. The report concluded that risk reduction and/or risk management measures to mitigate human exposure to lead, arsenic, and PAHs in soil were needed. With respect to ecological receptors, the report also recommended additional monitoring of the metals in sediment and the bioavailability of PAHs. The investigation also concluded that the elevated concentrations of lead, PAHs, and arsenic in sediment were not dissolving into surface water in the lake, meaning that these constituents pose no risk to human health, the environment, or the beneficial uses of surface water in the lake given its status as an emergency non-potable water supply for the City of San Francisco.

### **REMAINING ENVIRONMENTAL CONCERNS**

15. There remains a documented potential human health risk from current and future exposure to lead, arsenic and PAHs accidentally discharged and dispersed into the soils throughout the Site. Also, there remains a potential risk to benthic organisms from exposure to lead, arsenic and PAHs in the sediment that requires further study and possible remediation.

### **BENEFICIAL USES**

16. The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law and U.S. EPA, where required.
17. The SFPUC manages Lake Merced and has designated the lake as a non-potable emergency water supply for the City of San Francisco that would be used for firefighting or sanitation purposes if no other sources of water were available. No potable use of Lake Merced is anticipated. The existing and potential beneficial uses of Lake Merced include:
  - a. Municipal and domestic supply (Potential)
  - b. Commercial and sport fishing
  - c. Cold fresh water habitat
  - d. Warm fresh water habitat
  - e. Wildlife habitat
  - f. Fish spawning
  - g. Water contact recreation (fishing only)
  - h. Non-contact water recreation

18. State Water Board Resolution No. 68-16: State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to the Dischargers and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Cleanup levels other than background levels shall be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives.
19. State Water Board Resolution No. 92-49: State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under California Water Code Section 13304," establishes policies and procedures to be used by the Board when:
  - a. Determining when a person is required to investigate, cleanup, or abate a discharge;
  - b. Concurring with a discharger's selection of cost-effective investigation and remedial measures;
  - c. Overseeing implementation of investigation and remedial measures; and
  - d. Determining schedules for investigation and remedial measures.
20. Basis for California Water Code Section 13304 Order: The Dischargers have caused or permitted, causes or permits, or threatens to cause or permit waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of contamination or nuisance.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

21. This action adopts an order to enforce the laws and regulations administered by the Regional Water Board. The revision of site cleanup requirements and the rescission of Order No. 94-017 are not projects as defined in the California Environmental Quality Act (CEQA). There is no possibility that the adoption of this order and the rescission of prior Order No. 94-017 will have a significant effect on the environment. (Cal. Code Regs., tit. 14, §§ 15378 and 15061, subd. (b)(3).)

## **NOTICE AND MEETING**

22. The Regional Water Board has notified the Dischargers and interested agencies and persons of its intent to issue Site Cleanup Requirements and has provided them with an opportunity of a public hearing and an opportunity to submit their written views and recommendations.
23. The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this issuance of Site Cleanup Requirements.

**IT IS HEREBY ORDERED**, pursuant to CWC section 13304, that the Dischargers (or their agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

**PROHIBITIONS**

1. The discharge of wastes or hazardous substances in a manner that will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
2. Migration of pollutants through subsurface transport to waters of the State is prohibited.
3. There shall be no discharge of wastes or hazardous substances to surface waters.
4. Activities associated with the subsurface investigation and cleanup that will cause significant adverse migration of wastes or hazardous substances are prohibited.
5. The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in CWC section 13050(m).
6. The Dischargers shall not cause toxic or other deleterious substances to be present in concentrations or quantities that may cause deleterious effects on aquatic biota, wildlife or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentration.

**TASKS**

**UPLAND SOILS**

1. **HUMAN HEALTH CLEANUP STANDARDS:** The Dischargers shall propose cleanup standards for the uplands portion of the Site sufficient to protect human health under current and future uses, including visitors, site workers and neighbors. Proposed standards shall be supported by an analysis of human health risks associated with exposure to Site contaminants.

**COMPLIANCE DATE:** August 1, 2013

2. **REMEDIAL ACTION PLAN:** The Dischargers shall submit a technical report acceptable to the Executive Officer containing a remedial action plan and an implementation time schedule. This report shall evaluate the removal and/or management of soil to meet the human health cleanup standards in the reports requested in Task 1.

**COMPLIANCE DATE:** October 1, 2013

3. **COMPLETION OF REMEDIAL ACTION:** The Dischargers shall submit a technical report acceptable the Executive Officer documenting the completion of the tasks identified in the technical report requested in Task No. 2.

**COMPLIANCE DATE: January 1, 2016**

**LAKE SEDIMENTS**

1. **WORKPLAN FOR ECOLOGICAL RISK ASSESSMENT:** The Dischargers shall prepare and submit a workplan and schedule to implement a comprehensive investigation and ecological risk assessment including analysis of existing sediment data and hypothetical risks to wildlife from exposure to impacted sediments in Lake Merced. This investigation would be used to determine whether elevated levels of lead, arsenic and PAHs in sediment pose an unacceptable risk to benthic organisms and wildlife (including waterfowl) based on bioavailability and long term exposure. If results indicate unacceptable risks to benthic organisms and wildlife, the evaluation would then be used to determine appropriate cleanup standards for the protection of the benthic community and wildlife exposed to contaminants in site sediments.

**COMPLIANCE DATE: December 1, 2013**

2. **ECOLOGICAL RISK ASSESSMENT:** The Dischargers shall submit a technical report acceptable to the Executive Officer documenting the completion of the tasks identified in the technical report requested in Lake Sediment Task No. 1.

**COMPLIANCE DATE: October 1, 2014**

3. **REMEDIAL ACTION PLAN:** If requested by the Executive Officer, the Dischargers shall submit a technical report acceptable to the Executive Officer containing a remedial action plan and an implementation time schedule. This report shall evaluate the removal and/or management of sediment per the results of the technical report submitted in Lake Sediment Task No. 2.

**COMPLIANCE DATE: Three months after request by the Executive Officer**

4. **COMPLETION OF REMEDIAL ACTION:** The Dischargers shall submit a technical report acceptable the Executive Officer documenting the completion of the tasks identified in the technical report requested in Lake Sediment Task No. 3.

**COMPLIANCE DATE: January 1, 2016**

**PROVISIONS**

1. Compliance: The Dischargers shall comply immediately, or as prescribed by the time schedule contained herein, with all Prohibitions, Tasks, and Provisions of this Order. All required submittals must be acceptable to the Executive Officer. The Dischargers must also comply with all conditions of this Order. Violations may result in enforcement actions, including Regional Water Board orders or court orders requiring corrective action or imposing civil monetary liability, or in modification or revocation of this Order by the Regional Water Board. (CWC §§ 13261, 13262, 13265, 13267, 13268, 13300, 13304, 13350).
2. Authority to Request Technical Reports: All technical and monitoring reports required by this Order are requested pursuant to CWC section 13267. Failure to submit reports in accordance with schedules established by this Order or failure to submit a report of sufficient technical quality to be acceptable to the Executive Officer may subject the Dischargers to enforcement action pursuant to CWC section 13268.
3. Authorized Reports: All technical reports submitted pursuant to this Order shall be prepared under the supervision of and signed by a California registered civil engineer, or a California professional geologist.
4. Modifications to Remedial Action Plan: The Dischargers shall notify the Executive Officer at least 60 days prior to implementing any proposed major modifications to any approved Remedial Action Plan, Implementation Schedule, or remediation system. The notification shall include the rationale for any proposed modification.
5. Delayed Compliance: If the Dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the Tasks, the Dischargers shall promptly notify the Executive Officer of the delay and reason for the delay and the Regional Water Board may consider revisions to this Order.
6. Operation and Maintenance: The Dischargers shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.
7. Availability: A copy of this Order shall be maintained by the Dischargers and shall be made available by the Dischargers to all employees or contractors performing work necessary to comply with the Tasks set forth in this Order.
8. Change in Ownership: In the event of any change in control or ownership of the facility presently owned or controlled by the Dischargers, the Dischargers shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be forwarded to the Regional Water Board upon a final change in control or ownership.

To assume operation of this Order, the succeeding owner or operator must apply in writing to the Executive Officer requesting transfer of this Order within 30 days of the change of

ownership. The request must contain the requesting entity's full legal name, mailing address, electronic address, and telephone number of the persons responsible for contact with the Regional Water Board. Failure to submit the request shall be considered a discharge without requirements, a violation of the CWC.

Due Date: 30 days after a change in facility control or ownership

9. Reporting of Hazardous Substance Release: If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it probably will be discharged in or on any waters of the State, the Dischargers shall:
  - a. Report such discharge to the following:
    - i. The Regional Water Board by calling (510) 622-2369 during regular office hours (Monday through Friday, 8 a.m. – 5 p.m.); and to
    - ii. The California Emergency Management Agency at (800) 852-7550.
  - b. A written report shall be filed with the Regional Water Board within five working days. The report shall describe:
    - i. The nature of the waste or pollutant.
    - ii. The estimated quantity involved.
    - iii. The duration of the incident.
    - iv. The cause of the release.
    - v. The estimated size of the affected area, and nature of the effect.
    - vi. The corrective actions taken or planned and a schedule of those measures.
    - vii. The persons/agencies notified.

This reporting is in addition to any reporting to the California Emergency Management Agency that is required pursuant to the Health and Safety Code.

10. Lab Qualifications: All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Regional Water Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g., temperature).
11. Document Distribution: Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following entities:
  - a) The Regional Water Board, and
  - b) The Department of Toxic Substances Control.The Executive Officer may modify this distribution list as needed.
12. Submittal Revisions: Where the Dischargers become aware that they failed to submit any relevant facts in a report or submitted incorrect information in any report to the Regional Water Board, it shall promptly submit such facts or information.

13. Severability: Provisions of this Order are severable. If any provisions of these Requirements are found invalid, the remainder of these Requirements shall not be affected.
14. Geotracker Requirements: The State Water Board has adopted regulations requiring electronic report and data-submittal to Geotracker. The text of the regulations can be found at the following URL:

[http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/index.shtml](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/index.shtml)

Parties responsible for cleanup of pollution at sites overseen by the Regional Water Board's Land Disposal Programs are required to submit the following information electronically to Geotracker:

- a. Groundwater analytical data;
- b. Surveyed locations of monitoring wells;
- c. Boring logs describing monitoring well construction; and
- d. Portable data format (PDF) copies of all reports (the document in its entirety [signature pages, text, figures, tables, etc.] must be saved as a single PDF file).

Note that the Dischargers are still responsible for submitting one hard copy of all reports pursuant to this Order. The Regional Water Board may require direct submittal of electronic reports and correspondence in addition to the State Water Board's Geotracker requirements.

15. Entry and Inspection: The Dischargers shall allow the Regional Water Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:
- a. Enter upon the Dischargers' premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
  - d. Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the CWC, any substances or parameters at any location.
16. Maintenance of Records: The Dischargers shall retain records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order. Records shall be maintained for a minimum of five years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Executive Officer. Records of monitoring information shall include:
- a. The date, exact place, and time of sampling or measurements;

- b. The individuals who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The individuals who performed the analyses;
- e. The analytical techniques or method used; and
- f. The results of such analyses.

17. Report Certification: All application reports or information to be submitted to the Executive Officer shall be signed and certified as follows:

- a. For a corporation – by a principal executive officer or the level of vice president.
- b. For a partnership or sole proprietorship – by a general partner or the proprietor, respectively.
- c. For a municipality, state, federal, or other public agency – by either a principal executive officer or ranking elected official.

A duly authorized representative of a person designated in this provision may sign documents if all of the following are met:

- The authorization is made in writing by a person described in paragraph (a) of this provision;
- The authorization specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity; and
- The written authorization is submitted to the Executive Officer.

Any person signing a document under this Provision shall make the following certification:

“I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.” (CWC §§ 13263, 13267, and 13268.)

18. Cost Recovery: The Dischargers (as applicable) shall be liable, pursuant to CWC section 13304 and Health and Safety Code section 25270.9 to the Regional Water Board for all reasonable costs actually incurred by the Regional Water Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Water Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the Discharger (as applicable) over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

19. Periodic Order Review: The Regional Water Board will review this Order periodically and may revise it when necessary. The Dischargers (as applicable) may request revisions and upon review the Executive Officer may recommend that the Regional Water Board revise these requirements.

20. Order No. 94-017 is hereby rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, complete, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Region, on

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Bruce H. Wolfe  
Executive Officer

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**FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY  
SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED  
TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER  
CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL  
FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY**  
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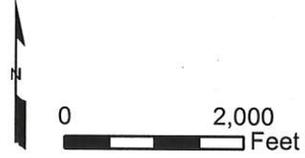
Figures:

Figure 1 - Location Map

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Base map from USGS 7.5' San Francisco South, California topographic quadrangle.



**SITE LOCATION MAP**  
Pacific Rod and Gun Club  
San Francisco, California