# FINDING OF NO SIGNIFICANT IMPACT 34<sup>TH</sup> AMERICA'S CUP RACING SERIES

National Park Service, U.S. Department of the Interior Golden Gate National Recreation Area/ San Francisco Maritime National Historical Park

#### August 2012

#### INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared, in accordance with the National Environmental Policy Act (NEPA), for the 34th America's Cup (AC34), San Francisco, California, an action with the potential for impact on federal lands and requiring special use permits for National Park Service (NPS) managed lands or waters at two units of the National Park System, Golden Gate National Recreation Area (GGNRA) and San Francisco Maritime National Historical Park (SAFR). The America's Cup is a series of international sailing events that the City and County of San Francisco (CCSF) proposes to host in summer-fall 2012 and summer-fall 2013. Planning and analyzing impacts of the proposed AC34 was the subject of a multi-agency NEPA process, including the U.S. Coast Guard, the U.S. Army Corps of Engineers and The Presidio Trust. The U.S. Coast Guard was a co-lead agency under NEPA and the other partners are cooperating agencies. Collectively, these agencies and the NPS are referred to as "the federal team." All four agencies will prepare their own FONSIs. This FONSI, Environmental Assessment (EA) and Errata Sheets (prepared as a technical attachment to the EA) comprise the complete record of environmental impact analysis for the project for the NPS. It should be noted that this is a multi-agency partnership initiative, with each participating agency responding to somewhat different requirements – this decision including Project stipulations pertain to NPS, and does not substitute for approval by other agencies for their proposed activities.

This document summarizes the alternatives considered in the jointly-prepared EA and focuses on the Selected Alternative. It includes the decision rationale for selecting this alternative (Alternative E) as well as specific environmental protection measures and the reasoning behind the statement that Alternative E would result in no significant impacts as defined by the Council on Environmental Quality (CEQ) NEPA regulations. Compared to the original AC34 Race Sponsor Proposed Action, the Selected Alternative has eliminated race-related venues on land in GGNRA, eliminating impacts from amplified sound, construction of bleachers and tents and very concentrated crowding, particularly at Crissy Field. Spectators are still expected at Crissy Field and other park sites, and a series of resource, visitor experience and safety and asset protection measures including fences, resource monitors, and an incident command team to minimize impacts to the visitor experience and visitor safety would be in place. Other permit conditions will include buffers for race yachts and support and spectator boats as well as for helicopters to

minimize the effects of noise on visitor experience and sensitive wildlife. All protection and management measures which NPS is partially or fully responsible to implement for protection of resources, visitors and park assets and values are documented in Attachment 1.

#### PURPOSE AND NEED FOR ACTION

The purpose of the federal action is to establish the regulatory framework and conditions under which AC34 can be conducted and concluded and if AC34 and related events are authorized, to provide for a safe and enjoyable experience during AC34 events. In addition, the purpose of the federal action is the protection of resources, values, and uses of the federal lands and waters and of the marine and maritime environment.

Federal action is needed because the America's Cup Event Authority, LLC and the City and County of San Francisco (together the Project Sponsor or ACRM) are proposing to hold race-related events in San Francisco Bay and surrounding environ which would involve use of land, water, and air space under federal jurisdiction. Federal approval in the form of permits or authorities is needed for AC34 to proceed. The federal government needed to engage in transparent, integrated, and informed decision-making to respond to this request and to ensure that any final decision conformed to all applicable laws and regulations, protected resources, met the purpose and objectives and was within stated legal and regulatory constraints.

#### **ALTERNATIVES**

The jointly-prepared EA analyzed four action alternatives and the No Action alternative. The federal team developed the following objectives which helped to screen for the feasibility of the initial list of alternatives and eventually served to help distinguish Alternative E as the preferred and ultimately Selected Alternative.

#### Joint Agency Primary Objectives:

- Ensure safety for all affected parties before, during and after the event activities
- Avoid, minimize, or mitigate the impact on the environment and all affected parties, including through the use of sustainable, best practices
- Maintain acceptable level of operational readiness including adequate communications between agencies, the public, project sponsors and all affected parties as needed
- Provide for diverse, affordable, and enjoyable spectator and visitor experiences

#### National Park Service Primary Objectives:

(Note: All objectives apply to both the GGNRA and SAFR.)

• Ensure that permitted activities have a meaningful association between the park and the event and contribute to understanding of a park's significance.

- Minimize and mitigate effects of AC34 operations on existing unique park recreational uses (e.g., where few or no other local opportunities exist).
- Minimize impacts on park assets and sustain or restore all park assets (e.g., facilities, features, grounds, ships, etc.) to pre-event or better condition.
- Facilitate convenient and affordable multi-modal access to parks during the event.
- Maintain access for residents, park staff, park partners, and visitors.
- Provide for cost recovery (parks made whole for added or detailed staff, management, and restoration costs).

#### Alternatives Development

The federal team selected a preferred alternative after an eight-month-long alternatives development and screening process, during which time alternatives for the project's timing, location, race area configuration, spectator venues, and water-based work, among other elements, were analyzed. This process resulted in the identification of Alternatives A through D. In March of 2012, the federal team formally evaluated the relative merits of these alternatives during a two-day value analysis workshop. The alternatives were further evaluated using a process called Choosing by Advantages (CBA), where the relative importance of the advantages between alternatives is considered. The agencies' objectives for taking action served as the bases for development of the criteria against which the alternatives were evaluated. Among the four alternatives developed to that point (Alternatives A through D), the workshop found Alternative C to provide the most advantages. However, in using CBA to develop a preferred alternative, the federal team was able to craft an additional action alternative, based upon elements of previously developed alternatives that ranked highest during the value analysis, while leaving behind those elements that did not score as well. In this workshop, Alternative E—the Preferred Alternative, was created.

#### Range of Alternatives Considered

The EA analyzed five alternatives, briefly summarized here:

#### Alternative A - No Action

The No Action Alternative is included as an alternative for detailed analysis pursuant to 40 CFR 1502.14(d) of the Council on Environmental Quality's NEPA regulations. Pursuant to CEQ guidance, for cases in which the federal action concerns a decision regarding a proposed project, the "no action" alternative would mean the proposed activity would not take place (CEQ 1981). In this Environmental Assessment, the No Action Alternative assumes that the NPS, USCG, Corps, and Presidio Trust would not issue permits, develop special regulations, or undertake other

discretionary actions to authorize the 34th America's Cup (AC34). As such, under Alternative A, there would be no AC34 races on San Francisco Bay, no organized AC34 activities on NPS lands, and no AC34-related water-based work.

#### **Alternative B- Sponsor Proposed Project**

This is the original project proposed by ACRM and does not reflect modifications made by the project sponsors later in the NEPA process. The maximum race area would start approximately 600 feet off the San Francisco waterfront and extend from Crissy Field to Aquatic Park in 2012. In 2013, the race area would be larger, approximately 1,200 feet from the waterfront and extend from Battery East to Piers 27-29. The USCG would publish a SLR or Special Local Regulation that would allow it to prohibit commercial vessel boat traffic from entering. Offshore of Crissy Field, a non-motorized watercraft zone would extend from 300 to 600 feet in both 2012 and 2013. No watercraft would be allowed closer than 300 feet from the shore of the Crissy Field Wildlife Protection Area (WPA).

Under Alternative B Crissy Field would be the site for a range of facilities and services, including a large tent and a variety of smaller temporary structures housing hospitality services, food and beverage concessions, educational installations, a first aid station, restrooms and hand washing stations. A large event stage for live entertainment, bleacher-style seating for public viewing of the races on central Crissy Airfield, up to three large video screens to provide spectators with live video feeds and race commentary, and amplification systems would be used. SAFR would serve as a spectator venue (primary viewing area) for events in both 2012 and 2013, hosting vendors and exhibitions. Video screens in the vicinity of the bleachers were proposed (on land) for race viewing, and six race and exhibition boats would be anchored in Aquatic Park Cove during both years' events. Fort Baker Pier was proposed to serve as a private, after-hours (i.e., 7:00 p.m. to 11:00 p.m.) hospitality venue in 2012 and 2013 and would be used exclusively for hosting corporate and private functions. Battery Cavallo would be considered for the installation of broadcasting equipment associated with AC34 event communications. Alcatraz Island's main cellhouse would serve as a private, after-hours (i.e., 7:00 p.m. to 11:00 p.m.) hospitality venue up to twice in 2012 and five times in 2013. Fort Mason would serve as a site for media operations in 2012 and 2013 and would provide a temporary international broadcast center and television studios, satellite communications, and hospitality services. Up to 10 satellite dishes on the apron at Pier 3 and a floating barge at Pier 2 may be built.

#### Alternative C- No Organized Events on NPS Lands

Alternative C would include no programming specific to the AC34 events on NPS (or Presidio Trust) lands. The race events schedule, location of the race and race area management would be the same as described for Alternative B. While a few small indoor private events could still occur in certain NPS buildings that typically host such events, these would be similar to those that might otherwise occur in the absence of the America's Cup. Despite this change, secondary viewing spots on NPS lands would remain excellent locations to watch the races and would attract additional visitors.

At Crissy Field, rather than the large-scale educational programming described in Alternative B, the NPS would instead expand maritime-themed educational programs within existing park and partner interpretive programs. First aid kiosks and Advanced Life Support responders, portable restrooms, and hand-wash stations would be provided during all race weekends at Crissy Field and at SAFR. No AC34 outdoor exhibitions, boat displays in Aquatic Park Cove, video screens near the bleachers or any other event would take place at SAFR, although AC34-related interpretive materials may be displayed in partnership with other maritime museums. The Maritime Museum would be available for private event-related activities under a separate special events permit. As they would at Crissy Field, first aid kiosks and Advanced Life Support responders, portable restrooms, and hand-washing stations would be provided during all race weekends. Viewing opportunities would continue at Fort Mason, Fort Baker, Alcatraz Island and in the Marin Headlands but no services or events would be provided.

#### Alternative D - Modified Program

The race schedule and race area management activities would be the same as that described for Alternative B. Although the race area location would be the same for 2013, it would be shifted east in 2012 by about one-quarter mile to minimize spectator impacts on Crissy Field.

In 2012, the race location would be shifted ¼ mile east and end east of Muni Pier and Aquatic Cove at approximately Pier 41. A reduced level of programming at NPS lands would be offered during both 2012 and 2013 and would take place only on weekends.

Under Alternative D, limited programmed AC34 events at Crissy Field would include a large tent, smaller booths for food and beverage concessions, portable restrooms, hand washing stations, and smaller bleachers. No sponsor displays or private tents would be built on NPS lands; AC34 merchandizing would be integrated into park partner retail in existing buildings or in Presidio Trust buildings at Crissy Field. No event stage, video screen or amplification would be available, but Wi-Fi kiosks to transmit race related feeds to individual mobile devices would be available. Under Alternative D, there would be limited programmed events at SAFR, but the park would host maritime-themed exhibits and educational programs. Similar to Alternative B, Fort Mason would serve as a site for media operations for 2012 and 2013, and would include a floating barge for media boats. Instead of 10 satellite dishes installed on the pier apron of Pier 3, Alternative D would leave the Pier 3 apron open for public access. Organized event-related activities at Alcatraz Island in 2012 and 2013 would be the same as those described for Alternative B, after hours on a limited basis. There would be no programmed AC34 events at Fort Baker.

#### **Alternative E (Agency preferred)**

As noted above, Alternative E was developed through the federal team's participation in a Choosing by Advantage (CBA) process and includes elements taken from other action alternatives. It also incorporates project sponsor-proposed revisions that emerged after the environmental analysis began in December 2011.

Alternative E is similar to that of Alternative C in that it would involve no public AC34 programmed activities at Crissy Field, Presidio Trust lands, Fort Mason, Alcatraz Island, Fort Baker, or the Marin Headlands. At SAFR, Alternative E most closely resembles Alternative B as it includes the opportunity for some AC34 programmed activities at SAFR on weekends. Protection measures developed for Alcatraz Island nesting seabirds, including a 2000-foot vertical and 1000-foot horizontal buffer for helicopters, most closely resemble those for Alternative D. The types, locations, and dates of Alternative E 2012 race events are also slightly different from those of the alternatives described previously, while those of 2013 remain unchanged.

As with all other alternatives, two America's Cup World Series (ACWS) events would occur in 2012. However, whereas the original 2012 schedule called for six days of racing between August 11 and 19 for the first series, the modified schedule shows five race days between August 22 and 26. The second series was originally scheduled for six days between August 27 and September 2, but has been changed to five days to coincide with Fleet Week, which occurs from October 3-7. There would be up to four races on race days, with fleet racing held on Sundays and finals held on Saturdays. It is expected that each individual 2012 race would be completed within 45 to 60 minutes and would occur no earlier than 1:00pm and no later than 6:00pm. The race schedule for AC34 events in 2013 would be generally the same as that described for Alternative B with the addition of a 4-5 day Youth Cup race series in late August/early September 2013.

The location of the first set of 2012 races would be shifted east from the original Sponsor Proposed Action by ½ mile. This would free up recreational marine space off of Crissy field and focus spectators on facilities and amenities off NPS lands at Marina Green. The 2013 primary race course area, and the contingency race course area for both years, would be the same as those described for Alternative B.

As noted above, Alternative E assumes no public AC34 programmed events on GGNRA lands during the 2012 or 2013 race periods, although a few small, indoor, private after-hours events, or one-off evening events, could still occur within NPS buildings or areas that typically host such activities. As in Alternative C, the park would expand maritime-themed educational programs within existing park and partner interpretive programs at Crissy Field. First aid kiosks and Advanced Life support teams, portable restrooms, and hand washing hand washing stations would be provided at a minimum during all race weekends.

Organized event-related activities at Alcatraz Island in 2012 and 2013 could be similar to those described for Alternative B. The main cellhouse could serve as a private after-hours (i.e., 7:00 p.m. to 11:00 p.m.) hospitality venue up to two times in 2012 and five times in 2013. Weather monitoring and communication broadcasting equipment (satellite dishes) similar to those described for Alternative B could be installed within the grounds for signal transmission during 2012 and 2013 and would be subject to terms and conditions of the special use permit issued by the NPS.

Under Alternative E, programmed events at SAFR would be limited to race weekends. During events in 2012 and 2013, SAFR could host exhibitions and various maritime-themed educational programs. The project sponsors may also elect to anchor up to six display boats within Aquatic

Cove. In addition, small land-side video screens and an announcement system, and/or Wi-Fi kiosks, could be set up by the project sponsors to help spectators better follow the race events. First aid kiosks and Advanced Life support teams, portable restrooms, and hand washing stations would be provided at a minimum during all race weekends.

#### SELECTED ALTERNATIVE AND RATIONALE

Following public review and consideration of all comments received on the EA, the agency preferred alternative – Alternative E - is selected for implementation.

Compared to the other alternatives, advantages of Alternative E include:

- Better support of balanced unique visitor experiences;
- Fewer impacts on day -to -day operations;
- Lower potential for impacts on natural resources;
- Reduced impacts from in-water construction; and
- More protection for avian species.

#### **ENVIRONMENTALLY PREFERABLE ALTERNATIVE AND RATIONALE**

The Council on Environmental Quality (CEQ) defines the environmentally preferable alternative as the alternative that best promotes the national environmental policy expressed in Section 101 of NEPA. This section (101(b)) states it is the continuing responsibility of federal agencies to:

- fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
- preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
- achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and

• enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

When considering the major components of the action alternatives, along with the management measures described in Attachment 1, Alternative E emerged as the action alternative that best promotes the policy factors above.

Alternative E would provide for the widest range of beneficial uses, while avoiding or minimizing impacts to park resources, protecting visitors and providing for a quality visitor experiences. By timing the AC34 2012 events to coincide with Fleet Week, Alternative E would involve fewer days of 'exclusive' use of lands and waters under federal jurisdiction, freeing up these areas for use by others. In contrast to Alternative C, which would involve no organized events on NPS land, Alternative E would allow for use of SAFR on weekends if there was agreement on the type and scale, and to a lesser extent at Alcatraz. NPS would ensure that any such activities were limited in size, duration, and frequency, and restricted to areas where potential impacts to sensitive resources would be minimized or avoided altogether. As with landside activities, and compared to other action alternatives, Alternative E water-based work (i.e., dredging, which takes place entirely outside NPS lands) would be substantially reduced. The eastward shift in Alternative E 2012 race areas would create the largest buffer between sensitive resources at Crissy Field and the race area, further limiting crowding along waterfront GGRNA parklands and potential impacts to rare vegetation and wildlife, and existing visitor uses and experience. In addition, the aircraft and marine vessel buffers established for sensitive habitat areas would often be larger than those identified for other action alternatives. For these reasons, Alternative E is also the Environmentally Preferable Alternative.

#### **PUBLIC INVOLVEMENT**

The public was notified of the commencement of this NEPA process through a variety of media outlets, including: regular (USPS) mail, newspaper advertisements, two websites, posted flyers, e-mail, and a press release. On August 1, 2011, mailers announcing the scoping period were sent to the more than 3,900 individuals on the mailing lists maintained by each federal agency on the team. The next day, advertisements of the scoping period and public meetings were published in 15 newspapers, including a Chinese language publication. On August 5, notice was also posted on two separate websites, one managed by NPS and one and managed by the NEPA consultant for the EA. On August 10, flyers were posted throughout the project area. And on August 17, the federal team issued a press release to several Bay Area newspapers, which announced the name and description, the purpose of the federal action, the duration of the scoping period, the federal agencies involved, and the project website addresses.

The federal agency team held public scoping meetings on August 17, 18, and 23, 2011, in Sausalito, San Francisco, and Oakland, respectively. Separate meeting venues were offered to encourage participation by potentially interested parties throughout the Bay Area. All meetings were conducted in an open house format, occurred in the early evening, and offered the same opportunities to participate and comment. Topics addressed during the meetings included: (1)

project purpose, need, and objectives; (2) description of the project alternatives under consideration; (3) potential venue plans and management zones; (4) potential impact topics; (5) traffic and access areas for study; (6) potential alternatives; and (6) additional information on opportunities for public participation and comment. Materials displayed at the open house were also made available through the project websites.

The scoping period remained open for a period of 49 days—from August 5 to September 23, 2011. During that time, the federal team received 48 pieces of correspondence, containing 383 comments representing the views of the general public, civic groups, public agencies, businesses, recreational groups, and conservation and preservation groups, among others. Submittals from public (federal) agencies and conservation/preservation groups accounted for about one-quarter of all submittals (six each). All comments received were duly considered in the preparation of the EA.

On June 7, 2012, the EA was released for public review in a formal 30-day comment period that closed on July 7, 2012. The EA was circulated to local, state, and federal agencies and to interested organizations and individuals to allow them to review and comment on the report. An electronic version of the EA was made available on the NPS Planning, Environment and Public Comment (PEPC) website (<a href="http://parkplanning.nps.gov/AC34">http://parkplanning.nps.gov/AC34</a>). The NPS held a public open house during the comment period on June 21, 2012 in the Presidio of San Francisco. A printed copy of the EA was available for public review at the open house along with electronic and display board presentations. A summary of the EA was prepared and printed copies of the summary were made available at public libraries located in San Francisco, Oakland and Alameda. Electronic copies of the entire EA were also made available to the public upon request.

A total of four comment letters were received: from the California Department of Boating and Waterways and California Coastal Commission; the Richardson Bay Audubon Center & Sanctuary; the Star Alliance (Foundation for All); and the Environmental Council. In summary, the following issues were identified:

- Without adequate funding, park and city/county staff or resources would be less available for regular responsibilities
- The rare elegant tern should be added to the list of species of special concern
- The specifics of how boaters will receive information about release of bilge water, water pollution regulations and availability of sewage pumping stations, as well as details of how, when and how often boats would be inspected should be added
- The 2012 race schedule should end no later than 4 p.m. to facilitate water sports

Overall, no major issues or relevant new information not already considered in preparing the EA emerged from the public review.

#### REGULATORY COMPLIANCE

#### Endangered Species Act of 1973, as amended (16 USC §1531 et seq.)

#### Consultation with U.S. Fish and Wildlife Service

The NPS, USCG, and Corps engaged the United States Fish and Wildlife Service (USFWS) in informal consultation to evaluate the implications of the AC34 project upon federally listed species within the project area, as required under Section 7 of the Endangered Species Act.

In November 2011, NPS, USCG, and the Corps submitted a biological assessment (as revised and updated) to USFWS. The document concluded that, with proposed conservation measures, the AC34 project may affect, but is not likely to adversely affect mission blue butterfly, western snowy plover, California least tern, longfin smelt, San Francisco lessingia, Presidio manzanita, Presidio clarkia or Marin dwarf-flax. According to the BA, the effects would be short-term and would be avoided through specific conservation measures that have each been incorporated into the project protection measures (Attachment 1). Concurrence from the USFWS that AC34 is not likely to adversely affect any threatened or endangered upland species was received July 31, 2012.

#### Consultation with the National Marine Fisheries Service

The NPS, USCG, and Corps, have engaged the National Marine Fisheries Service to evaluate the implications of the AC34 project upon federally listed species and essential fish habitat within the project area, as required under Section 7 of the Endangered Species Act and Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

In December 2011, NPS, USCG, and the Corps submitted a BA to NMFS. Pursuant to the Section 7 consultation, the document concluded: the AC34 project would not result in permanent impacts to Endangered Species Act (ESA) or Essential Fish Habitat (EFH)-managed species, based on: (a) the avoidance and minimization measures proposed in the BA; (b) the avoidance and minimization measures proposed for pile driving activities; (c) project plans and actions that prevent the introduction and spread of invasive non-native organisms, and (d) the relatively small percentage of habitat and temporary nature of most AC34 project activities that would be involved. The B.A did note, however, that the project could result in minor temporary impacts to sturgeon and steelhead trout, and potential impacts to Chinook salmon and steelhead trout habitat. Pursuant to the MSFCMA, the BA concluded that the project could affect EFH through actions unrelated to NPS decision-making or NPS managed lands or waters. These included: dredgingand construction-related turbidity; disruption of benthic foraging habitat as a result of these activities; potential habitat avoidance during pile driving; temporary loss of foraging habitat due to these activities; and temporary increase in predation of pelagic schooling fish as a result of incidental night-time lighting by temporary floating dock light. With implementation of conservation measures identified therein and included in the EA, such impacts would be avoided or minimized, and temporary. The federal team received a biological opinion from the NMFS which concluded consultation under the Endangered Species Act for marine and anadromous species.

The city/county of San Francisco and the SF Port Authority also submitted and received a request for "take" for harassment of marine mammals from the NMFS on July 31, 2012.

Because neither the NMFS Biological Opinion nor the "take" permit for incidental harassment of marine mammals involves NPS decisions, they are not appended to the FONSI but are to the EA itself.

#### National Historic Preservation Act Section 106 Consultation

Each federal agency involved in the AC43 event, including the NPS, the Presidio Trust, the United States Coast Guard (USCG), and the United States Army Corps of Engineers (Corps) is pursuing compliance with Section 106 independently, yet in a coordinated fashion, to address effects on cultural resources that may occur as a result of their permitting activities. As required under NHPA regulations (36 C.F.R. 800.2(d)) this EA provides the public with information about each agency's proposed action(s) and their effects on historic properties.

NPS compliance is being conducted in accordance with the Programmatic Agreements (PAs) between the NPS, the California State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP). The GGNRA has entered into two Pas with SHPO and the ACHP: one that covers cultural resources parkwide and another that specifically addresses potential effects on the resources of the Presidio. Under these PAs, the GGNRA is exempted from further consultation with SHPO and the ACHP if all effects of a project on cultural resources can be reduced to a non-adverse level (i.e., no more than minor effects). SAFR executed a similar PA with SHPO and the ACHP regarding the resources under its jurisdictions.

The EA and a site conditions assessment report (AC34 Section 106 Report) prepared by ESA for the GGNRA and SAFR was used to determine if the finding of "No Adverse Effects" could be made for the AC34 project, and consequently, whether Section 106 review could be completed internally by the NPS under the PAs with SHPO and the ACHP. The EA has concluded AC34 would result in no adverse effects because of the protection measures identified in Attachment 1 to this FONSI.

#### Title 1, Section 176 c (1) Clean Air Act, General Conformity Rule 58 FR 63214)

The U.S. Environmental Protection Agency (U.S. EPA) promulgated the General Conformity Rule (58 FR 63214) to implement the conformity provision of the Clean Air Act (CAA). Section 176(c)(1) requires that the federal government not engage in, support, or provide financial assistance for licensing, permitting, or approving any activity not conforming to an approved CAA State Implementation Plan in nonattainment or maintenance areas of the country.

The San Francisco Bay Area Air Basin is designated as a nonattainment area for the federal 8-hour ozone standard and the federal fine particulate (PM2.5) standard. The basin is designated as a maintenance area with respect to the federal carbon monoxide (CO) standards. Through this NEPA process, the federal team has worked with the U.S. EPA (through the Bay Area Air Quality Management District or BAAQMD) to ensure that its final decision with regard to the AC34 project would conform to State Implementation Plans, not cause or contribute to new

violations of the federal National Ambient Air Quality Standards (NAAQS), and ensure that attainment of NAAQS within the air basin is not delayed. The BAAQMD has indicated it does not issue a written statement unless requested, and that the NPS should interpret their silence as concurrence that the AC34 project does meet conformity requirements.

#### Migratory Bird Treaty Act (MBTA)

This Act makes it unlawful, except as permitted by regulations "at any time, by any means, or in any manner, to pursue, take, or kill any migratory bird, or any part, nest or egg of any such bird, included in the terms of conventions" with certain other countries (16 USC 703). This includes direct and indirect acts, although harassment and habitat modifications are not included unless they result in the direct loss of birds, nests or eggs. Alternative E includes a required 500-foot minimum ocean buffer and a 2,000 vertical and 1,000 foot horizontal helicopter buffer to protect nesting migratory seabirds on Alcatraz Island. If implemented as recommended by NPS( and endorsed by USFWS biologists), these buffers would prevent violation of the Migratory Bird Treaty Act by AC34 operations.

### WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE QUALITY OF THE HUMAN ENVIRONMENT

Determining the significance of potential impacts is based upon consideration of the characteristics of context and intensity: (a) Context. Context includes geography, baseline conditions, the affected interests, agency mandate and duration and timing. (b) Intensity. This refers to the severity of impact. The following ten criteria in the CEQ NEPA regulations (40 CFR 1508.27) apply in determining significance:

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. Individually or collectively, the impacts of AC34 on park resources, assets, and values would not be significant by virtue of either the protective and management measures in Attachment 1 or their limited duration. With these measures in place, impacts to all park resources, including geology and soils; hydrology and water quality; greenhouse gases, biological resources; cultural resources; visitor uses and experience; soundscape and noise; park operations; and visual quality would be negligible, minor or moderate and short term. Impacts to car traffic, transit, and pedestrian and bicycle access to the park during peak weekends could be major, but these are reduced through the use of traffic flow direction, separate bike lanes and lockers, additional shuttles and buses to accommodate additional visitation to the park and assistance from the incident command team. The ICT would help direct visitor flow through the use of: managing shuttle drop offs, printed and changeable message signs, portable public announcement systems, two-way radios to communicate where crowding is occurring and how to best alleviate it, and the use of hard and soft barriers to direct pedestrians. Because these impacts would occur for only a few weeks in the summers of 2012 and primarily in 2013 and are more typical in an urban environment than a remote NPS setting, these major short term impacts do not in context mean a significant impact would occur.

- (2) The degree to which the selected alternative affects public health or safety. AC34 could result in safety issues for pedestrians and bicyclists from increased visitation and traffic. Pedestrian and bicycle flows at pinch points, or areas where traffic flow would necessarily narrow or be particularly congested, would be managed through several means. Emergency access would be assured through the use of a designated access route to SAFR and Crissy Field, as well as to secondary viewing areas in Marin Headlands, Fort Baker and Fort Mason. Crowding is not expected at other park locations, including at Alcatraz, although a few people may stay longer on the island than is normally the case. VUE-14 (see Attachment 1) details emergency response protection measures. These include stationing CCSF funded emergency medical support at several locations near to park sites during race weekends and other race days as needed and the use of advanced life support responses to keep response times to 5 minutes or less 90 percent of the time. VUE-7 specifies sanitation facilities (portable restrooms and hand sanitation stations) and maintenance procedures to help protect public health. In addition to the means identified above to keep pedestrians moving. TRA-9 identifies the use of city staff as "ambassadors" who would be stationed at identified pinch points or heavy traffic (bike or pedestrian) areas to remind bikers to walk their bikes and avoid collisions, TRA-10 describes the temporary bike lanes and bike routes that would be established on peak visitation days (estimated to be 5 days in 2012 and between 11 and 24 days in 2013). These include Van Ness Avenue between North Point and Bay Streets and Bay Street between Van Ness and Laguna Street. With the protection measures described above and additional measures such as overall actions of the Incident Command Team described in Attachment 1, impacts to public health and safety would be minor and short term and would not be significant.
- (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. Protection measures for historic and cultural resources are described under Item 8 below. No prime farmlands or wild and scenic rivers would be affected by AC34. Alcatraz Island Seabird nesting habitat, Horseshoe Cove eelgrass beds, the Crissy Field Wildlife Protection Area (WPA) and habitat in Fort Baker and the Marin Headlands for the Mission Blue butterfly are ecologically important. Habitat at Alcatraz would be protected through the use of marine vessel and helicopter buffers during AC34 to keep nesting birds from leaving their nests or fledglings as a result of noise or disturbance. BIO-10 and BIO-11 describe the distances, timing and exclusions as part of the protection of Alcatraz nesting birds, and include a 500 foot minimum distance for racing yachts, racing support boats, racing emergency boats and spectator boats from Alcatraz (commercial traffic will be kept to vessel lanes outside the entire race area), and a 2000 foot minimum vertical and 1000 foot minimum horizontal distance for AC34 Project Sponsor helicopters. BIO-5 explains how signs and fences would be used to protect sensitive natural resources, including the WPA (fences would be improved), Crissy Field dunes (fences would be improved), Crissy Marsh, serpentine areas and Mission Blue butterfly habitat in some areas of the Headlands and Fort Baker. BIO-3 speaks to the Resource Management and Monitoring program the NPS would implement. This program would use trained monitors who know the park resources well to enforce

fencing, point out signs for restrictions or closures and report to law enforcement any violations. The monitors would also make suggestions to the Incident Command Team on how to improve compliance with closures if needed. Wetlands at Crissy Field (e.g. Crissy Marsh) would be protected through existing fencing and resource monitors. Eelgrass beds in Horseshoe Cove would not be exposed to anchoring or increased turbidity from race related boats, as only those with existing permits to enter would be allowed during AC34 (BIO-6).

- (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial. The federal team received only 4 letters and emails on the EA. Those comments did not indicate any controversy over the analysis of effects or of the project itself.
- (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The federal team is counting on several factors to reduce both uncertainty and risk. For example, instead of keeping protection measures optional as mitigation, the federal team integrated them into the selected alternative. This means that approving Alternative E also means all protection measures described in Attachment 1 would become mandatory permit and enforcement conditions, reducing uncertainty. Ensuring full function of the Incident Command Team (ICT) also will reduce risk of impact, as the ICT is considered important in ensuring protection of resources, park assets, park visitor safety and visitor experience is high quality. Management or protection measures, as well as data collection (resource monitors, shuttle schedules, visitor numbers and pedestrian movement, bicycle numbers, traffic congestion etc.) to maximize communication, training, coordination and funding for the ICT are all included as mandatory conditions of AC34 to help in this regard. With these measures in place, the degree to which effects are highly uncertain or involve unique or unknown risks is low.
- (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. While allowing a special use of GGNRA or SAFR for up to 60 days in 2013 is atypical, there is no particular or automatic expectation that impacts from these longer special uses, if they do occur, would result in significant impacts.
- (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Cumulative impacts to park resources are most likely to come from increased crowding related to AC34 in combination with current or other projected future visitation. The area around the park has considerable car and bus traffic and related noise currently and visitation in park sites where AC34 would result in increases averages about 29,000 per day on a weekend day. The total visitation during Fleet Week is about 49,000. The Selected Alternative includes an overlap with Fleet Week weekend in 2012, and visitation is expected to total 52,000 at AC34 affected park sites during that weekend. This is an increase of 3,000 people over "normal" Fleet Week

visitation and is not a significant cumulative effect on visitor experience, park resources, park operations or assets. During non-Fleet Week weekends, cumulative visitation from AC34 spectators and "regular" park visitors is expected to be around 41,000 in 2012 and 55,000 in 2013. This would cause a decrease in the levels of service at some park locations and a minor to moderate cumulative effect on visitor experience. Changes that were incorporated into the Selected Alternative to keep impacts from becoming more than moderate included moving the race course to the east in 2012 where SAFR would be able to absorb a greater number of visitors (than at Crissy Field where the original course was centered), eliminating all park venues at GGNRA sites including Crissy Field and Fort Baker and creating and funding the ICT and other protective measures described above and in Attachment 1. The first two changes dropped total visitation from 55,000 to 41,000 on peak weekends in 2012 and from 96,000 to 55,000 in 2013. Because these numbers are within range of an average Fleet Week where significant impacts to park resources and values have not occurred, and because of the ICT and other protection measures would lower impacts from even these high visitor numbers, no cumulative significant impacts are expected.

- (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. The primary concern with cultural resources is the impact of trampling, turf degradation, erosion, or crumbling or other structural damage, as well as potential graffiti, artifact collection and other vandalism. The Selected Alternative includes no ground disturbance, and archeological resources would not be affected. The potential impacts to turf or structures would be minimized through the use of fencing, signs, access restrictions and/or resource monitoring as appropriate to each potentially affected location. The potential to damage structures, such as Hyde Street Pier, Muni Pier, or the East and West Roundhouses at SAFR could be moderate or major without protection measures, but with access restrictions stipulated, impacts to possibly affected park cultural resources would be completely eliminated or negligible. No adverse effects to park cultural resources under the NHPA Section 106 requirements would occur, and no significant impacts to cultural or historic resources are expected. Although no loss or destruction of significant scientific resources would occur, USGS has been funded to help in monitoring the reaction of Alcatraz nesting seabirds to AC34, resulting in increased site and project-specific scientific information about the impacts of sailboats and support vessels on the birds, a benefit related to the project.
- (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. Listed wildlife that may be affected includes the western snowy plover at Crissy Field and Mission blue butterfly at Marin Headlands and Fort Baker. A number of listed plant species, including Presidio Manzanita, Marin dwarf-flax, Presidio clarkia, San Francisco lessingia, and California seablight grow in the some parts of the larger project area, including in rare serpentine soils along the bluffs east and north of Baker Beach (the first four) or in the dunes or marsh of Crissy Field (California

seablight). While Baker dunes and beach are not viewing areas for the race, it is possible that they would experience greater impacts during the races from visitors displaced by AC34 spectators at other park locations. Impacts to these communities and species would generally be minimized because of their location (for example, Baker Beach cliffs are not a viewing location), difficulty of access (slopes on the east side of Fort Baker or in the Marin Headlands are steep and somewhat dangerous) and the nature of the vegetation itself (e.g. riparian scrub is dense and thorny). However, where sensitive plants, wildlife or wildlife habitat is accessible and is likely to be affected by spectators, fencing, resource monitors and/or restrictions would often be put in place to ensure protection. For example, fencing at Crissy dunes would be strengthened and additional fencing would be installed at Crissy Wildlife Protection Area. Signs and restrictions to keep spectators from moving off trails and into Mission blue butterfly habitat, as well as resource monitors if needed, would be used at Fort Baker and in the Marin Headlands. Where single individuals or small populations of listed or sensitive plants grow outside of fenced or otherwise protected areas (such as where monitors are located or signs are placed), they may be subject to additional trampling from spectators seeking views of the races. Helicopters that are part of AC34 would be required to stay at least 1000 feet from the Crissy Field mean high tide mark and a minimum of 1000 feet above Crissy Field, a protection measure that would minimize noise disturbance to western snowy plovers. Fireworks would also be eliminated in 2012 and be shot in 2013 from Pier 27-29 or a similar location to minimize disturbance to plovers (and to Alcatraz nesting seabirds). Eliminating venues at Crissy Field would also mean less human disturbance and no amplified sound, another protection measure for plovers. Impacts to Mission blue butterflies and western snowy plovers would be minor with these measures in place, and no significant impacts would occur. This finding has been affirmed by the U.S. Fish and Wildlife Service, which has concurred with a finding of "not likely to adversely affect."

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. The original Proposed Action did not have a 500-foot buffer around Alcatraz Island or a 2000-foot helicopter elevation restriction over the island. It is possible, given data collected on responses by the seabirds nesting at Alcatraz to a combination of human related noise and helicopters flying at 1000 feet that some "take" as defined by the Migratory Bird Treaty Act might have occurred from one of the adults abandoning a nest or a chick or egg falling off the cliffs when a parent panics. With the larger buffers, no "take" is expected and therefore no violation of laws or regulations is expected.

#### **FINDING**

The NPS has considered the information and analyses in the EA and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record.

Based on NPS guidance, policies, monitoring, and experience, and the capability of protection and management measures to avoid, minimize, or eliminate impacts; it is the determination that the selected alternative for AC34 is not a major federal action having the potential to substantially affect the quality of the human environment. The NPS has determined there are no significant direct, indirect or cumulative effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the region. The NPS Selected Alternative is neither scientifically nor publicly controversial. Implementation of the NPS Selected Alternative will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any federal, state, or local law. Implementation of the NPS Selected Alternative does not set any precedent nor will it automatically trigger other actions which may require environmental impact statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared.

Recommended	1: Mand Dearl	8/10/12
	Frank Dean, General Superintendent	Date
	Golden Gate National Recreation Area	
Recommended		8-10-2012
	Craig Kenkel, Superintendent	Date
	San Francisco Maritime National Historical Park	
Approved:	Seon / Tues	8/10/12
	Chris Lehnertz, Regional Director	Date /
	Pacific West Region, National Park Service	,

## MANAGEMENT AND PROTECTION MEASURES WITH IMPLEMENTATION RESPONSIBILITIES

Meas ure	Measure Source/ Description Location	Impler Respon	ementation onsibility	
	Biological Resources Management and Protection Measures			
BIO-1	Incident Command System. An Incident Command System (ICS), required by NPS Management Policies for large scale events, would be employed by NPS and the Presidio Trust, in coordination with other agencies, for the AC34 race series programs to augment ongoing operations through provision of staff and infrastructure support. The NPS system would be organized into divisions to span eight distinct NPS areas, and include the Presidio Trust managed lands fi authorized by the Trust, while integrating both GGNRA and SAFR command, planning, logistics, administration, transportation coordination, and field support functions, including resource management and monitoring, visitor use management and monitoring, law enforcement, safety, facilities and grounds maintenance, communications, parking management, and event and permit management.	NPS Agreem ent/ Permit and Trust / Agreem ent /Permit	City and County of San Francisco (for funding, staffing and interagency co-ordination)/ NPS and Presidio Trust (for implementation with other agencies).	
	For the World Series AC34 2012 race program, these agencies would employ a Type 3 ICS Team with external augmentation of resources based on the shorter duration, scale and complexity level. For 2013, a Type 2 ICS Team would be deployed for those peak times needed by NPS with external augmentation to allow the park units to continue to meet their other obligations for the longer duration and higher visitation estimates with appropriate support. Any Event Authority and CCSF functions and responsibilities related to NPS or Presidio Trust lands or waters would be managed through this incident command (IC) structure. Command liaisons would also serve as representatives of the interests of both NPS park units and the Presidio Trust as part of other multi-agency area command structures set up for this event in order to ensure agency representation in multi-agency decision-making and communication links with the IC. The City and Event Authority, as co-project sponsors, would be responsible for coordinating with local agencies and jurisdictions (including BCDC, Marin County, and Sausalito, etc.) on managing access			

Meas ure	Measure Source/ Description Location	Implei Respo	nentation nsibility
	and impacts to their areas and on operational coordination.		
	The City and County of San Francisco would ensure that an integrated and coordinated regional system of management would be implemented to address jurisdictional concerns and to protect recreational and area resources by providing sufficient staff support to carry out, at a minimum: (1) the identification, inventory, and protective measures for park resources of special concern to land management agencies; (2) visitor management and crowd control to protect these resources, and ensure public safety, throughout the duration of AC34 event program and series; and (3) ensure these primary and secondary areas are maintained well on daily bases with repairs as needed, and returned to their pre-event condition, to the extent damaged or impacted by event activities (e.g., trash pick-up, irrigation system repair, historic ship or facility repairs, permanent restroom maintenance, trail repair, revegetation, turf replacement, and re-sodding, etc.).		
	SFPD would provide additional commissioned officers to be integrated into or augment the NPS IC to support LE work in NPS areas during AC34 race days, especially on 2012 and 2013 weekends and Fridays (see specific obligations of (7)-(14) commissioned officers in 2012 and 20 in 2013 in permit). In addition, the City and County of San Francisco will form an integrated regional decision-making group with key representation from each of the primary jurisdictional agencies (e.g., including USCG, NPS, ACEA, ACRM, CCSF, etc.) to provide for communication and coordination on multijurisdictional issues and actions requiring such that cannot be satisfied at the field or agency level through bi-lateral, agency coordination.		
BIO- 2	Visitor Use Management & Monitoring Strategies. Visitor Use Management and Monitoring strategies would be developed for all NPS AC34 primary venues and viewing areas affecting NPS lands and facilities, with identification of pre-determined points where management actions could be implemented to mitigate adverse impacts of crowding Described more fully under Management and Protection Measure TRA-9, visitor use management and monitoring measures would include demand	NPS Agreem ent and/or Permit with CCSF	City and County of San Francisco (for funding, staffing and interagency co-ordination and implementation in coordination with the NPS and Presidio Trust)

Meas ure	Measure Source/ Description Location		mentation nsibility
	distribution strategies and on-site crowd management strategies for varying attendance levels. With regard to sensitive resource management, visitor use management and monitoring strategies would include crowd control personnel and infrastructure.		
BIO-3	Resource Management & Monitoring Program. NPS would implement a Resource Management & Monitoring Program to ensure protection of sensitive NPS natural and cultural park resources, including Crissy Field WPA and other sensitive habitats such as dunes, wetlands, and Alcatraz waterbirds within NPS areas. The purpose of the NPS monitoring program would be to stop any activity that has the potential to damage NPS sensitive resources before it happens, and to provide for short and adaptive management. The program would consist of trained resource monitors assigned to both roving and stationary positions. Resource monitors would facilitate resource protection by informing visitors of the reasons for restrictions and by observing and reporting violations of the established fencing and signage protection measures. All NPS monitors would be trained in assigned NPS resource area protocols and report daily to a supervisory resource specialist under the Incident Command division relevant to the sensitive NPS resources area requiring protection; and, if needed, they would request additional staffing, fencing, or signage resources to address problem areas based on monitoring. These include: all sensitive natural resources identified by NPS, including those on Alcatraz Island and the Crissy field Wildlife Protection Area (WPA). Monitors would be backed-up by law enforcement personnel as part of the division Incident Command to ensure compliance measures are observed. The exact number, location, and scheduling of the monitors would be determined by the appropriate land authority where the impacts are anticipated. At a minimum, monitors would be observing those areas that provide habitat for Mission blue butterflies, including the butterfly host plant (Lupinus albifrons), the Snowy Plover on Crissy Field's WPA, and nesting shorebirds on Alcatraz Island. ACRM will manage and operate the races within NPS regulations, statutes and laws to	NPSPermit	City and County of San Francisco (for funding and interagency coordination / ACRM (for implementation of the races) and NPS (for implementation for its lands and waters).
BIO-	insure these sensitive natural resources are protected.  National Parks Event and Operations Plan. NPS and the	NPS/C	City and County of San

Meas ure	Measure Source/ Description Location		nentation nsibility
4	Presidio Trust would prepare and implement, in coordination with CCSF, a National Parks Event Operations Plan that incorporates relevant information from the final selected alternative, along with additional related planning information, into a park area specific reference document. For each primary park viewing area (e.g., SAFR, Fort Mason, Crissy Field, etc.), the document would identify common and unique event-related management and conservation measures of which implementation is necessary to reduce impacts for that park area (i.e., location of protective fencing, marine and air traffic restrictions, temporary visitor support facilities, visitor bike and transit measures provided for by CCSF).	CSF Permit	Francisco (for funding, and interagency coordination); NPS, Presidio Trust, and CCSF (for implementation for respective jurisdictions)
BIO-5	Fencing and Signage of Sensitive Biological Resource Areas. The CCSF would provide for the funding for installation of signage and fencing, as necessary, to protect land-based natural and cultural resources. Fencing location and type would be determined by the agency responsible for management of the lands on which potential impacts could occur. Fenced areas would have signs announcing the presence of sensitive wildlife/botanical areas. The fencing would be light enough for removal, or left in, if warranted, between2012 and 2013 race events, but substantial enough to deter visitors from entering the fenced off areas. Installation of fencing would be completed no later than one week prior to the commencement of the 2012 and 2013 events and programs.	NPS Permit with CCSF	City and County of San Francisco (for funding, NPS for implementation)
	Sensitive biological resources to be fenced include areas providing habitat for Mission blue butterflies, including the butterfly host plant (Lupinus albifrons), and other NPS sensitive species. This would include the western snowy plover, federally listed as a threatened species, found along the Crissy Field shoreline in the Crissy Beach WPA. Signage indicating a closed area due to sensitive resources would be established for the Crissy Field WPA and in areas that meet the criteria for federally-protected wetlands (by Clean Water Act or National Park Service authority) in the vicinity of Crissy Field. Sensitive plants are also largely concentrated in the dunes and serpentine soils of the Presidio, and the serpentine areas at Crissy Marsh and Beach. Sensitive habitat in secondary viewing areas expected to be impacted on NPS lands in Marin		

Meas ure	Measure Source/ Description Location	Impler Respon	nentation nsibility
	County occurs along the coastal bluffs in the vicinity of Conzelman Road and the north tower of the Golden Gate Bridge, and at Fort Baker.		
	Those sensitive resources in primary viewing areas would use a combination of fencing and signage, and/or assigned resource monitors depending on the level of threat.		
BIO- 6	Protection of Marine Species from Vessel Traffic. Project sponsor would ensure marine mammals in the race course would be avoided and potential harassment and/or collision prevented. Official Race Course Marshals on small boats would survey the course prior to and during races, and would be tasked with scanning for debris, obstructions, and the potential rare occurrence of a whale or other large marine mammal. In the event a large marine mammal is observed in the racecourse, the Marshals would postpone or abandon the race, as warranted by the presence and behavior of the animal.	NPS(for NPS jurisdict ional waters); and USCG(f or other marine areas) thru	ACRM and CCSF, with input from NPS and USCG
	To minimize potential incidental impacts associated with visitor vessels anchoring within areas of the bay containing eelgrass beds (i.e., upper Richardson Bay and along the coast from the Sausalito Water Treatment Plant to Cavallo Point), the project sponsor would upgrade 10 mooring anchors presently located within sensitive eelgrass areas with less invasive anchoring systems. In addition, anchoring within Horseshoe Cove would be limited to permitted vessels only. NPS would monitor and manage access, as appropriate in 2012 and 2013, as part of its Incident Command System, to ensure protection of such eelgrass beds in NPS areas. USCG and the project sponsors would provide educational outreach materials to boaters that describe best boating practices and area restrictions.	Agreem ent and/or Permits	
BIO- 7	Protection of Marine Species From Aircraft. The CCSF and ACRM would instruct official AC34 and event-related aircraft pilots that they must maintain a minimum altitude of 1,000 feet above the water's surface when humpback whales are present within the race area. Upon takeoff all helicopters would be required to climb immediately to altitude and not fly low over the water if any seal or sea lions are present within 1,000 feet	IHA/NP S/Agree ment and/or Permit/ General Manage	ACRM, in coordination with USCG and NPS

Meas ure	Measure Source/ Description Location	Imple: Respo	nentation nsibility
	of the helipad. When landing, the helicopters would approach the landing pad from as high an altitude as possible; they would also limit their time at low altitudes while over the water if seals or sea lions are present within 1,000 feet of haul-out areas including Little Alcatraz Island, and Pt. Blunt on Angel Island. During flight operations, helicopters will minimize impacts to pinnipeds by avoiding low flying over pinniped haul out areas and as safety permits.	ment Measure / USCG Marine Event Permit	
BIO-	Temporary Area Restrictions on NPS lands for Sensitive Species Protection. To protect sensitive habitat areas on GGNRA lands, NPS may restrict temporarily various trail, area, or roads during race events. This could include closure of fire roads and trails, such as Drown Fire Road at Fort Baker, and Conzelman Road in the Marin Headlands, to protect the Mission Blue Butterfly and its habitat during peak or high visitation race events, and the shoreline and marine areas in the Crissy Field WPA to protect western snowy plovers.	NPS General Manage ment Measure	ACRM for marine /shoreline restricted areas; NPS for its own land areas
BIO-9	Special Local Regulation (SLR): Marine Buffer Around Crissy Field Wildlife Protection Area (WPA). A no-marine access zone of 300 feet offshore of the Crissy field WPA to protect snowy plovers would continue to be enforced. In addition, in 2012 and 2013, the USCG would establish a designated marine zone along Crissy Field for recreational water users and small non-motorized watercraft, which would be closed during race periods to motorized vessels and all other vessels greater than 20 feet in length. The zone would extend from approximately 300 to 600 feet from the shore along Crissy Field. Restricting motorized and larger vessels from this area would help reduce environmental impact to the Crissy field shoreline, ensure access and safety for recreational water users, and reduce potential viewing obstruction for visitors ashore.	USCG/ Marine Event Permit/ Special Local Regulati on/ NPS permit	ACRM restriction; USCG implements in cooperation with NPS
BIO- 10	Marine Buffer Around Alcatraz Island. During the 2012 and 2013 AC34 race periods, NPS would establish a buffer around Alcatraz Island, within which marine vessel traffic would be restricted in order to protect nesting seabirds along the western cliffs of the island. The buffer would extend a total of 500 feet out from the island, be closed to all vessel traffic, monitored by ACRM and USCG, and demarcated by either buoys or other	NPS Permit; USCG Marine Event Permits	ACRM restriction; USCG implements in cooperation with NPS

Meas ure	Measure Source/ Description Location	Implen Respon	nentation nsibility
	means to ensure clear designation. This would also be noted in the annual update to the park's compendium regulations. No personal watercraft would be permitted within ¼ mile of any NPS lands. Boat patrols by USCG or other regulatory agency and ACRM would enforce these closures in concert with NPS law enforcement staff and the NPS ICS. The project sponsors would provide educational outreach materials to boaters that describe best boating practices and area restrictions.		
BIO- 11	Aircraft Buffers .During the 2012 and 2013 race periods, official AC34 aircraft would be prohibited from entering the airspace within 1,000 feet vertical and 1,000 feet horizontal of the mean high tide line of all National Park Service lands, with the exception of Alcatraz Island, over which aircraft buffer would extend to 1,000 feet horizontal and 2000 feet vertical to protect nesting shorebirds (see maps in permit). The project sponsors would provide educational outreach materials to air traffic control and local and commercial news pilots regarding these advisories. A flight advisory notice (i.e., NOTAM) to avoid these areas would be issued by FAA to all aircraft in the vicinity.	NPS Permit; USCG Marine Event Permits	CCSF and ACRM implement in coordination with FAA
BIO- 12	After Hours Activities at Alcatraz Island Private events at Alcatraz Island would be limited to the hours of 7:00pm and 11:00pm, after normal public visiting hours, so as not to interfere with regular visitation to the island and to minimize potential impacts to the ferry embarkation point at Pier 31 ½. Such events could occur twice in 2012 and five times in 2013 on evenings when no other public uses are present, and in accordance with all NPS special event regulations. Private event activities would be limited to the cellhouse and include a programmatic component that increases understanding of the site significance through an interpretive tour. No outside lighting would be added for these events. Private events at Alcatraz Island would be authorized under a separate special events permit and NPS would limit the number of participants based on the type of event. However, it is assumed that such events would be limited to a maximum of 250 persons.	NPS Separate Event Permit, as needed.	ACEA; NPS
BIO- 19	Restrictions on Fireworks Displays. In 2012, the CCSF and ACEA would not launch fireworks for AC34. In 2013, any	USFWS /	ACEA and CCSF

Meas ure	Measure Source/ Description Location		mentation nsibility
	AC34 event-related fireworks would be launched from a location distant from Alcatraz Island and Crissy Field (i.e., near Piers 27/29 roughly 1.65 miles from Alcatraz Island), in order to avoid potential impacts to sensitive bird species. As determined necessary by the NPS, fireworks or canon fire would be limited to protect snowy plovers at Crissy Field WPA and Alcatraz Island seabirds from harassment. Such restrictions would involve measures, such as limiting where such activities are staged, or stipulating maximum allowable noise (decibels) at the Crissy Field WPA and Alcatraz Island. Any fireworks displays would be coordinated with both the NPS and the USCG regarding limitations on location, frequency, and duration to minimize potential environmental impacts and protect mammals from portions of firework aerial shells and chemical residue falling back to the ground or water. Any proposed fireworks displays over water would be subject to approval by the USCG and addressed within the Marine Event Permit.	Biologic al Assess ment  NPS and USCG Agreem ent and/or Permit with both Project Sponsor s	
BIO- 20	Restrictions on Night Lighting. Project sponsor would ensure that all lights that are to be left on during the evening hours would be fully shielded and downward cast, to contain and direct light away from habitat, the sky, and bay waters. No additional outside lights are allowed on Alcatraz Island, Crissy Field (Area A), or Fort Baker. Night lighting on NPS lands would be very limited to SAFR on weekends, and potentially on Alcatraz in the cellhouse.	NPS/Ag reement and/or Permit USFWS / Biologic al Assess ment/Co rps Section 10 Permit	CCSF and ACEA
	Cultural Resources Management and Protection Measures		
1	Incident Command System. NPS and Presidio Trust would implement an Incident Command System (ICS), as described in Management and Protection Measure BIO-1, above. In addition, the ICS would specifically address cultural resources	NPS and Presidio Trust/	Project sponsors (for funding)/ NPS and Presidio Trust (for implementation in

Meas ure	Measure Source/ Description Location		Implementation Responsibility	
	identified in the AC34 Section 106 Report.	Agreem ent and/or Permit with CCSF	coordination with other agencies)	
CUL- 2	Visitor Use Management & Monitoring Strategies. NPS would implement visitor use management and monitoring strategies, as described in Management and Protection Measure BIO-2, above. These strategies would be implemented at primary venues and viewing areas affecting NPS lands and facilities, with management actions that could be implemented to mitigate adverse impacts of crowding and to ensure the protection of park resources.	NPS Permit/ Agreem ent and/or Trust Permit	Project sponsors (for funding and implementation in coordination with NPS and Presidio Trust)	
CUL-3	Resource Management & Monitoring Program. NPS would implement a Resource Management & Monitoring Program, established through the completion of the Section 106 Report (Cultural Resource Condition Assessment Report). At a minimum, cultural resource monitors would be stationed to monitor at the following locations: Batteries Spencer, Yates, East, and Ridge; North of Battery Duncan; Hyde Street Pier Historic Fleet; and Upper Fort Mason. In addition, the resource management and monitoring program would specifically address cultural resources identified in the AC34 Section 106 Report.	NPS/Ag reement and/or Permit	CCSF (for funding)/NPS and Presidio Trust (for implementation)	
CUL- 4	Park Event and Operations Plan. NPS would prepare and implement, in coordination with CCSF and the Presidio Trust, a Park Event Operations Plan, as described in Management and Protection Measure BIO-4, above. In addition, this would specifically address cultural resources identified in the AC34 Section 106 Report.	NPS/C CSF Permit	CCSF (for funding)/ NPS, Presidio Trust, and CCSF (for implementation)	
CUL- 5	Fencing and Signage of Sensitive Cultural Resources Areas. The project sponsor would provide for the installation of signage and fencing, as necessary, to protect cultural resources. Signage would be determined through development of a signage plan for the protection of sensitive resources, in accordance with existing signage requirements for each site.	NPS Agreem ent and/or Permit	CCSF (for funding)/NPS and Presidio Trust (for implementation)	

Meas ure	Measure Source/ Description Location	Imple: Respo	plementation sponsibility	
	The plan would be prepared no later than 30 days prior to the commencement of the 2012 events, and would be subject to review and approval of each agency with jurisdiction over the areas to be fenced and signed. Fencing location and type would be determined by the agency responsible for management of the lands on which potential impacts could occur. Fenced areas would have signs announcing the presence of sensitive resources.			
	Final fencing type would be determined by the NPS both to protect sensitive areas and be compatible with NPS standards for such. In any case, the fencing would be light enough for removal, or left in, if warranted, between 2012 and 2013 race events, but substantial enough to deter visitors from entering the fenced off areas. Installation of fencing would be completed no later than one week prior to the commencement of the 2012 and 2013 events and programs.			
	All sensitive cultural resources in the primary and secondary viewing areas, except for historic ships would be fenced, signed, and protected by resource monitors backed up by law enforcement personnel as part of an IC. Areas requiring fencing for cultural resources include, but may not be limited to, the following: Batteries Spencer, Ridge, and East; Signal Cable Hut and the Black Point/Point San Jose Batteries at Fort Mason. Low fencing would be augmented by additional protective fencing that does not detract from the historic resource or cultural landscape. A total of approximately 1,050 feet of new fencing is recommended to protect cultural resources, including 650 feet of temporary removable fencing, and 400 feet of permanent fencing (wood post and wire type).			
CUL- 6	Historic Pier Access Restrictions. Municipal Pier would be closed on race days. Access to Hyde Street Pier would be managed during races to ensure that visitation did not exceed capacity so NPS is able to fully protect historic ships from impacts associated with overcrowding. Other exact locations and timing of closures would be determined in consultation with the appropriate land authority where potential impacts could otherwise occur. Such management would be implemented as part of the NPS Incident Command System	NPS/Ag reement and/or Permit	CCSF (for funding)/ NPS Incident Comment System (ICS) for implementation	

Meas ure	Measure Source/ Description Location	Impler Respon	mentation nsibility
	(see Management and Protection Measure BIO - 1).		
CUL-	Capacity Limitations at Fort Baker Pier There would be no programmed private events at Fort Baker Pier under Alternative E. Any one time private use would be subject to a separate special event permit.	NPS separate event permit if applicab le	NPS
CUL-8	Pre- and Post-event Conditions Assessment and Repair. Prior to the 2012 AC34 events, NPS-approved qualified cultural resources personnel would assess the existing condition of the historic earthen fortifications and other fragile historic resources, as described in the Section 106 Report, that could be subject to damage or erosion from visitors seeking viewpoints. NPS standardized site assessment protocols would be completed for all such affected historic resources. The types of information that would be collected include: photographic documentation, description, and geographic location information. The exact number of resources to be recorded, and the exact methods of recordation, would be determined in consultation with the appropriate land authority where the impacts are anticipated. Following both the 2012 and 2013 AC34 events, the CCSF, in coordination with the land managing agency's representatives, would ensure that qualified cultural resources personnel reassess the condition of historic resources identified above. The CCSF and ACEA/ACRM would be responsible for restoring to the pre-event condition any resources that are damaged as a result of their or their agent's respective uses of NPS lands or waters for the AC34 event.	NPS Agreem ent and/or Permit	Project Sponsors (for funding and damages if applicable), NPS (for identifying NPS sensitive resources to be assessed)
CUL- 9	Continued Section 106 Review of Planned Activities. The CCSF and ACEA would ensure any plans that call for the attachment, anchoring, or bracing of temporary structural elements to existing historic buildings, structures, or objects on park lands are reviewed no later than 60 days in advance of the AC34 event series for which it is intended by a qualified historical architect for compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.	NPS/Ag reement and/or Permit	CCSF and ACEA for preparing plans and implementation, if applicable/NPS (for ensuring compliance and restoration)

Meas ure	Measure Source/ Description Location	Imple Respo	Implementation Responsibility	
	The Secretary's Standards set forth appropriate techniques to govern and guide such activities (the "Temporary Structure Approach").			
	If such attachments, anchoring, or bracing by the project sponsors can be done without damage, and is agreed upon, then detailed site plans would be prepared by the project sponsor and provided for review to the GGNRA and SAFR preservation assessment teams for compliance with Section 106 of the National Historic Preservation Act. Plans would also be provided for review and approval to the land management agency responsible for the particular historic resource, as part of this environmental review and Section 106 compliance, in accordance with the terms of the programmatic agreements between the SHPO and the NPS.			
	Removal of any such attachments, anchors, or bracing would be fully reversible and include post-removal stabilization of historic materials to prevent long-term degradation in condition. Any unintended damage to NPS historic resources as a result of the AC34 event would be restored or repaired by the project sponsors to its pre-event condition. The agency responsible for the historic resource would make the final determination of when such restoration or repair activities are complete, and full compliance with the NPS-SHPO programmatic agreements has been met.			
CUL- 10	Any AC34 event-related weather monitoring and satellite equipment installed on NPS lands would be temporary, not interfere with existing operations (i.e., rooftop photovoltaic systems), be located as far from the water's edge as possible, and be subject to terms and conditions of an NPS special events permit and Section 106 of the National Historic Preservation Act, as applicable. In order to minimize obstructions of bay views, project sponsor would evaluate the potential for use of rooftop locations as an alternative to pier aprons for such installations. On Alcatraz Island, for example, such installations would be located in areas of limited visibility from visitor populated areas. Whenever possible, project sponsor would avoid the use of light or bright colored equipment for such installations, instead utilizing darker, earthen tones, to	NPS/Ag reement and/or Permit	Project sponsor with oversight by an NPS resource monitor	

Meas ure	Measure Source/ Description Location	Implementation Responsibility		
	minimize contrast with the surrounding landscape. Project sponsor would also remove or cover equipment when not in use.			
	Geologic Resource Management and Protection Measures			
GEO-1	Fencing and Signage of Sensitive Geologic Resources. The CCSF would provide funding for the installation of signage and fencing, if necessary, to protect sensitive resources. Incident command would review potential threats and make a determination of measures necessary to protect these areas, in consultation with the agency responsible for management of the lands on which potential impacts could occur. Fenced areas would have signs at frequent intervals announcing the presence of sensitive resources. The fencing would be light enough for removal, or left in place if warranted, between 2012 and 2013 race events, but substantial enough to deter visitors from entering the fenced off areas. Installation of fencing required by the land authority may be completed up to two weeks prior, but in no case later than one week prior to the commencement of the 2012 and 2013 events and programs. Fencing would be installed around the dunes and serpentine soils of the Presidio (Area A), as deemed necessary by NPS. Signage and access would be periodically monitored by law enforcement personnel as part of the ICS.	NPS and Presidio Trust /Agree ment and/or Permit	CCSF for funding)/NPS and Presidio Trust (for implementation)	
	Hydrologic Resource Management and Protection Measures			
HYD -4	Educational Materials for the Maritime Public. The project sponsor would develop and distribute to the maritime community educational materials on the proper and legal waste handling procedures in the bay and identify facilities for onshore waste disposal during the AC34 activities. These educational materials would include, but not be limited to, the following:  Information on invasive species and their impact on bay marine	AC34 Environ ment-al Impact Report  USCG Marine permit	CCSF in concert with ACRM	
	ecosystems and boaters as well as best management practices developed by the AC34 Invasive Species Task Force that boaters should implement to prevent the introduction or spread of invasive species into and out of the San Francisco Bay.  These provisions shall include but not be limited to pending	permit		

Meas ure	Measure Source/ Description Location	Implementation Responsibility		
	and proposed regulations by state and federal agencies responsible for the control of invasive organisms and shall incorporate established effective strategies such as "clean before you go";			
	Information about onsite and nearby environmental services that support clean boating practices (such as the locations of sewage pump outs, oil change facilities, used oil recycling centers, bilge pump outs, absorbent pad distribution and spent pad collection, and boat-to-boat environmental services);			
	Clearly describe, in multiple languages, common sources of pollution from boats and marinas, relevant regulations and clean boating policies, and provide a succinct description of best management practices to prevent pollution from these common sources, including oil and fuel, sanitary waste, detergents, hazardous waste, and marine debris (including the use and proper disposal of oil adsorbents in power boat bilges);			
	Information regarding the importance of keeping plastic out of bay waters; and Signage posted at AC34 temporary floating docks and adjacent to areas used by moored spectator vessels (10 vessels or more) regarding locations of waste collection containers.			
HYD -5	Water Quality Sampling. Water sampling would be done on a sample of race days in 2013 at beaches adjacent to the primary race course, including Aquatic Cove and Crissy Field.	NPS Permit/ Agreem ent	NPS/ CCSF	
	Maritime Navigation and Safety Management and Protection Measures			
NAV -1	SLR- Non-Motorized Recreational Use Zone. In 2012 and 2013, the USCG would establish a designated marine zone along Crissy Field for recreational water users and small non-motorized watercraft, which would be closed during race periods to motorized vessels and all other vessels greater than 20 feet in length. The zone would extend from approximately 300 to 600 feet from the shore along Crissy Field. Restricting motorized and larger vessels from this area would help reduce environmental impact to the Crissy field shoreline, ensure	USCG/ Spec-ial Local Regulati on; NPS Permit	USCG/NPS/ ACRM	

Measure Source/ Description Location		Implementation Responsibility	
access and safety for water recreational users, and reduce potential viewing obstruction for visitors ashore. A no-marine access zone of 300 feet offshore of the Crissy field WPA to protect snowy plovers would continue to be enforced.	-		
Maintenance of Maritime Commercial Activity. USCG Captain of the Port (COTP) would coordinate with commercial entities and America's Cup Race Management (ACRM) to minimize scheduled races' impact on the smooth flow of maritime commerce (including commercial ferries in the bay. The USCG would work with NPS and the park's Alcatraz Island ferry concessioner, and ACRM, to ensure that delays do not exceed 10 minutes, on average, during afternoon race periods. Actions that could be taken to achieve these objectives may include delaying scheduled races, re-routing traffic around the race area, adjusting shipping schedules, providing commercial vessels access through the race area, and providing ACRM escort boats for certain vessels, such as the Alcatraz ferry as needed, through spectator areas, and possibly the regulated race area. USCG would also increase patrols in the area to ensure boaters are informed of vessel traffic conditions and broadcast Notice to Mariners. USCG and ACRM would leverage other non-traditional communication means, including using social media, to inform recreational and commercial boaters about race conditions and closures. The USCG would use the Notice to Mariners system to communicate spectator vessel requirements including designating locations for vessels to move to when permitting the passage of shipping traffic.	USCG/ Special Local Regulati on' NPS Permit	USCG/ACRM	
Marine Buffer Around Alcatraz Island During the 2012 and 2013 AC34 race periods, NPS would establish a 500 foot buffer around Alcatraz Island, within which all marine vessel traffic would be excluded in order to protect nesting seabirds along the western cliffs of the island, as described in Protection Measure BIO-10.	NPS Permit/ USCG Special Local Regulati on and Marine Event Permit	NPS in cooperation with USCG;ACRM	
	access and safety for water recreational users, and reduce potential viewing obstruction for visitors ashore. A no-marine access zone of 300 feet offshore of the Crissy field WPA to protect snowy plovers would continue to be enforced.  Maintenance of Maritime Commercial Activity. USCG Captain of the Port (COTP) would coordinate with commercial entities and America's Cup Race Management (ACRM) to minimize scheduled races' impact on the smooth flow of maritime commerce (including commercial ferries in the bay. The USCG would work with NPS and the park's Alcatraz Island ferry concessioner, and ACRM, to ensure that delays do not exceed 10 minutes, on average, during afternoon race periods. Actions that could be taken to achieve these objectives may include delaying scheduled races, re-routing traffic around the race area, adjusting shipping schedules, providing commercial vessels access through the race area, and providing ACRM escort boats for certain vessels, such as the Alcatraz ferry as needed, through spectator areas, and possibly the regulated race area. USCG would also increase patrols in the area to ensure boaters are informed of vessel traffic conditions and broadcast Notice to Mariners. USCG and ACRM would leverage other non-traditional communication means, including using social media, to inform recreational and commercial boaters about race conditions and closures. The USCG would use the Notice to Mariners system to communicate spectator vessel requirements including designating locations for vessels to move to when permitting the passage of shipping traffic.  Marine Buffer Around Alcatraz Island During the 2012 and 2013 AC34 race periods, NPS would establish a 500 foot buffer around Alcatraz Island, within which all marine vessel traffic would be excluded in order to protect nesting seabirds along the western cliffs of the island, as described in Protection	access and safety for water recreational users, and reduce potential viewing obstruction for visitors ashore. A no- marine access zone of 300 feet offshore of the Crissy field WPA to protect snowy plovers would continue to be enforced.  Maintenance of Maritime Commercial Activity. USCG Captain of the Port (COTP) would coordinate with commercial entities and America's Cup Race Management (ACRM) to minimize scheduled races' impact on the smooth flow of maritime commerce (including commercial ferries in the bay. The USCG would work with NPS and the park's Alcatraz Island ferry concessioner, and ACRM, to ensure that delays do not exceed 10 minutes, on average, during afternoon race periods. Actions that could be taken to achieve these objectives may include delaying scheduled races, re-routing traffic around the race area, adjusting shipping schedules, providing commercial vessels access through the race area, and providing ACRM escort boats for certain vessels, such as the Alcatraz ferry as needed, through spectator areas, and possibly the regulated race area. USCG would also increase patrols in the area to ensure boaters are informed of vessel traffic conditions and broadcast Notice to Mariners. USCG and ACRM would leverage other non-traditional communication means, including using social media, to inform recreational and commercial boaters about race conditions and closures. The USCG would use the Notice to Mariners system to communicate spectator vessel requirements including designating locations for vessels to move to when permitting the passage of shipping traffic.  Marine Buffer Around Alcatraz Island During the 2012 and 2013 AC34 race periods, NPS would establish a 500 foot buffer around Alcatraz Island, within which all marine vessel traffic would be excluded in order to protect nesting seabirds along the western cliffs of the island, as described in Protection Measure BIO-10.	

Meas ure	Measure Source/ Description Location	Implementation Responsibility		
-5	During race periods in 2012 and 2013, Aquatic Park Cove would be restricted to permitted and closed to all other unauthorized vessel traffic. During race periods in 2013, Horseshoe Cove would be restricted to permitted vessels. Only with a permit, visiting vessels would be allowed to anchor in these coves. On race days in 2012 and 2013, NPS would receive assistance from the USCG marine enforcement unit to manage this access restriction at Aquatic Cove. Unless explicitly authorized by NPS, motorized vessels would not be permitted within either Aquatic Park or Horseshoe Coves.	anagem ent Measure	USCG;ACRM	
	Noise and Soundscape Management and Protection Measures			
NOI- 2	Noise Controls for Entertainment Venues. As described in AC34 EIR Mitigation Measure M-NO-2b, the project sponsors would develop and implement noise control strategies for operations and activities proposed for the AC34 activity venues, to reduce the severity of potential noise impacts from public address and/or amplified sound. The noise control strategy would include, but may not be limited to, the following measures:	AC34 EIR/NP S and Presidio Trust/A greemen t and/or Permit	ACEA; CCSF	
-	Compliance with noise controls and restrictions imposed by the land authority and their permit requirements for designated AC34 events, and the activities and entertainment associated therewith.			
	Where not otherwise addressed in federal permits, amplification levels generally would be established commensurate with the City's fixed residential interior noise limits of 50 dBA daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA nighttime (10:00 p.m. to 7:00 a.m.).			
·	Speaker systems would be directed away from the nearest sensitive receptors.			
	Volume settings at each entertainment venue would be identified during the first week of events using noise monitoring at the nearest sensitive receptors, as identified by the land management agency, such as Crissy Field WPA and residences of concern; and be performed by a qualified acoustical technician, in association with the project sponsors			

Meas ure	Measure Source/ Description Location	Impler Respon	nentation nsibility
	and the land managing agency's representative. Building attenuation would be assumed only for those residences that expected to have mechanical ventilation systems.		
	A point of contact would be designated by the both CCSF and ACEA (project sponsors) to respond to noise complaints and to ensure compliance with the first two measures above. This person would work with the San Francisco Entertainment Commission to establish set-up and operational conditions appropriate for each of the venues with regard to compliance with requirements of Section 47.2 of the San Francisco Police Code, and federal requirements established in conjunction with any event program permitted.		
	Acoustical monitoring would be required on race afternoons at Crissy Field, SAFR, and Alcatraz to measure decibel levels and compliance, if any event activities are permitted there (e.g. live race broadcasting at SAFR).		
	All noise control strategies would be subject to review and approval by NPS and the Presidio Trust, and included here also as conditions of their respective Special Events Permits.		
NOI-3	Stationary Sources of Noise. The AC34 project sponsor would use utility electricity in lieu of generators, if available. If electricity requirements exceed available power, the project sponsor would use the quietest generators available. The project sponsor would provide shielding or acoustical enclosures for generators. Additionally, the project sponsor would ensure that their activities do not exceed 60 dBA at the Crissy Field Center when educational activities are in progress. This level of noise reduction may be achieved through other means, such as shielding or use of smaller/quieter generators or non-diesel generators. Acoustical monitoring would be required on race afternoons at Crissy Field, SAFR, and Alcatraz Island to measure decibel levels and compliance, if any event activities are permitted there.	NPS/Ag reement and/or Permit	CCSF; ACEA
NOI- 4	Aircraft Buffers .During the 2012 and 2013 race periods, official AC34 aircraft would be <i>prohibited</i> from entering the airspace within 1,000 feet vertical and 1,000 feet horizontal of the mean high tide line of all National Park Service lands, with	NPS/Ag reement and/or Permit /	CCSF and ACRM in coordination with FAA and USCG

Meas ure	Measure Source/ Description Location		nentation nsibility
	the exception of Alcatraz Island, over which aircraft buffer prohibition would extend to 1,000 feet horizontal and 2000 feet vertical to protect nesting shorebirds. The CCSF and ACRM (project sponsors) would provide educational outreach materials to air traffic control and local and commercial news pilots regarding these advisories. A flight advisory notice (i.e., NOTAM) to avoid these areas would be issued by FAA to all aircraft in the vicinity.	Manage ment Measure	
NOI-5	Restrictions on Fireworks Displays. In 2012, the ACEA nor CCSF (project sponsors) would not launch fireworks. In 2013, any AC34 event-related fireworks would be launched from a location distant from Alcatraz Island and Crissy Field (i.e., near Piers 27/29), in order to avoid potential impacts to sensitive bird species. As determined necessary by the NPS, fireworks or canon fire would be limited to protect snowy plovers at Crissy Field WPA and Alcatraz Island seabirds from harassment. Such restrictions would involve measures, such as limiting where such activities are staged, or stipulating maximum allowable noise (decibels) at the Crissy Field WPA and Alcatraz Island. Any fireworks displays would be coordinated with both the NPS and the USCG regarding limitations on location, frequency, and duration to minimize potential environmental impacts and protect mammals from portions of firework aerial shells and chemical residue falling back to the ground or water. Any proposed fireworks displays over water would be subject to approval by the USCG and addressed within the Marine Event Permit.	USFWS /Biologi cal Assess ment  NPS and USCG/ Agreem ent and/or Permit	ACEA; and CCSF
	Transportation Management Measures		
	People Plan for National Parks Area. The City will develop and implement a People Plan for the Presidio and NPS lands that would identify transit service, and vehicle, pedestrian, and bicycle management strategies for access to and from the Presidio and NPS lands by visitors, employees, and AC34 spectators for review and approval by NPS at least 21 days in advance of finalization of this Environmental Assessment for public release, and then made available to the public as part of the public review of this document in draft, addressing all transit measures that would improve parklands access,	NPS and Presidio Trust/A greemen t and/or Permit	CCSF

Meas ure	Measure Source/ Description Location		nentation nsibility
	including, at a minimum, the following:		·
	Origin and termini for all improved transit to within ¼- mile of parklands, where possible;	·	
	Commitment to provide direct Muni augmented service to Crissy Field on race peak and high medium weekends in 2012 and 2013 (See TRA-6); and		
	Improved accessibility measures(see VUE-20 below)		
	Implement transit center near Crissy field (e.g. Palace of Fine Arts)		
TRA-2	AC34 People Plan Specific Provisions. The City would implement elements of the People Plan identified The 34th America's Cup and James R. Herman Cruise Terminal and Northeast Wharf Plaza EIR, as Mitigation Measures: M-TR-1a—Traffic Monitoring and Management Program, M-TR-1b—Transit Operating Plan, M-TR-1c—Satellite Parking Facility Program, and M-TR-1d—Public Information Program, identified below as TRA-1a through TRA-1d. Elements of the September 2011 People Plan, to facilitate access by all modes to and from the AC34 event venues, while maintaining acceptable conditions for residents, commuters, businesses and visitors, are currently being developed by the appropriate City agencies and the project sponsor, and are being finalized by CCSF as of August 2012.	Environ ment-al Impact Report	CCSF
TRA- 2a	Traffic Monitoring and Management Program. As a means to reduce congestion in the vicinity of the venue sites and on access roadways to and from the sites, the City would develop and implement a Traffic Monitoring and Management Program that would include the following measures:  Preferred spectator routes;  Bus priority streets;  New bus lanes;	Environ ment-al Impact Report	CCSF
	Extension of existing bus-only lanes;		

Meas ure	Measure Source/ Description Location		Implementation Responsibility		
	Bicycle priority streets;				
	On-street parking restrictions;		·		
	Traffic control officer deployment;				
-	Coordination with other events (e.g., ballgames; roadway construction projects);				
	Roadway closures;				
	Restricted access streets;				
	Diversion plans related to roadway closures;				
	Event signage including weekend detour signs; and				
	Media announcements of roadway closures and detour signs.				
TRA- 2b	Transit Operating Plan. As part of the People Plan, the City would develop and implement a transit operating plan to provide additional transit service to accommodate peak transit demands during the AC34 project events. Elements of the plan would include, but are not limited to:	Environ ment-al Impact Report	CCSF		
	Increased service hours and frequency on 30X-Marina Express, which would run every 8 minutes on all event days, including weekends.				
	Supplemental 30L-Marina, which would run every 6 minutes in the peak direction of travel (e.g., towards the waterfront through the mid-afternoon, and from the waterfront through the evening). The service would run between the Caltrain terminal and the intersection of Beach/Broderick (via Third/Fourth, Stockton, Broadway, Van Ness, and Lombard). See Figure TRA-7.				
,	Supplemental 47L-Van Ness, which would run every 10 minutes in the peak direction of travel throughout the day. Service would be provided between the Civic Center BART/Muni station and North Point Street, via Van Ness Avenue (see Chapter 4 Transportation Figure TRA-7).				

Meas ure	Measure Source/ Description Location	Implementation Responsibility
	Increased frequencies on the F-Market & Wharves historic streetcar between the Ferry Building and Fisherman's Wharf (i.e., at Pier 39), which would run every 5 minutes throughout the day.	
	New E-Embarcadero historic streetcar service between Caltrain and Pier 39. This service would need to use the double-ended historic streetcars, and would run every 20 minutes throughout the day.	
	Supplemental Muni Metro Shuttle. This light rail vehicle service would run within the Market Street tunnel between the Embarcadero station and the West Portal station. Shuttle service would be provided every 20 minutes on weekends only.	
	Golden Gate Transit would augment two bus routes for peak weekend race day service (the 93 and 4 bus routes). These routes would both be configured to serve local drop-off/pick-up service in San Francisco, using the bus stops currently shared with Muni and already used for inbound drop-off and outbound pick-up. In addition, Golden Gate Ferry would provide additional high-speed boats during the peak weekend race days from Larkspur and Sausalito.	
	AC Transit would augment the Berkeley (F) Route, the Oakland (NL) Route, and the Alameda (O) Route to provide extra service for peak weekend race days. In addition, the City is working with AC Transit on the feasibility of extending the existing route network beyond the Temporary Transbay Terminal on weekends, considering that the primary spectator areas would be along The Embarcadero west to Crissy Field.	
	SamTrans would augment the SamTrans 120 line to the Daly City BART station on peak weekend race days to provide additional transit service northbound during the morning period and southbound during the afternoon period.	
	BART would augment service to and from the East Bay and South Bay by providing additional cars to existing scheduled trains, and to run special "event" trains. Trip planning strategies for visitors destined to and from the San Francisco	

Meas ure	Measure Source/ Description Location	Impler Respo	mentation nsibility
	International Airport and the Oakland International Airport would be pursued by the City and BART, along with MTC.  Caltrain would provide for service with two extra weekend trains in each direction during peak weekend race days.  WETA would run additional ferry service during peak weekend race days on the Vallejo, Alameda/Oakland, and Harbor Bay routes. In addition, limited event service may be available at the new Oyster Point ferry terminal in South San Francisco that is projected to be open by 2012. WETA is also considering providing limited event service to Treasure Island on the augmented Alameda/Oakland service, provided that ADA complying modifications can be made at Pier 1 at Treasures Island.		
	Blue & Gold would augment regular service between San Francisco and Tiburon, as well as between San Francisco and Angel Island during the midday peak period on peak weekend race days.		
TRA- 2c	Satellite Parking Facility Program. As a means to reduce the number of vehicles traveling to and from the northern waterfront, the City would implement satellite parking facilities and frequent transit or shuttle service between the satellite parking facilities and the various venues. Parking facilities could include existing public and private garages and lots, as well as other undeveloped parcels such as Mission Bay Lot A and Candlestick Park. In the vicinity of the Presidio, UCSF Parnassus campus, and USF parking facilities have been identified as potential satellite parking facilities that would serve spectators destined to the Presidio.	Environ ment-al Impact Report	CCSF

Meas ure	Measure Source/ Description Location		nentation nsibility
TRA- 2d	Public Information Program. As a means to facilitate access to and from venues and spectator viewing areas by all modes, while encouraging the use of transit and alternate modes, the City would develop and implement a Public Information Program. For event days that overlap with other special events, a coordinated public information program would be developed and provided to the public. The program would provide:  Access information for all modes before, during and after the events;  Maps and guidelines;  Special signage;  Marketing campaign to encourage transit use and bicycle use to event sites;	Environ mental Impact Report; NPS Permit	CCSF
	Web-based event information;		
	Media and press releases to update information on a regular basis; and		
	Public information for commuters, businesses and deliveries.		
TRA-	NPS and Presidio Trust Sites- Public Information Program. As a means to facilitate access to and from venues and spectator viewing areas by all modes, while encouraging the use of transit and alternate modes, the City would develop and implement a Public Information Program for parklands. For event days that overlap with other special events, a coordinated public information program would be developed and provided to the public. This would be available for NPS and Presidio Trust review and coordination on parklands access at least 30 days in advance of each annual race series and available to the public online at least 10 days in advance of each race series event. The program would include, but not be limited to:	Environ ment-al Impact Report; NPS Permit	CCSF
	CCSF staffed Information Kiosks located at the Jefferson Street entrance to SAFR, at a visitor hub location such as the Palace of Fine Art, and near the Mason/Marina entrance to Crissy		

Meas ure	Measure Source/ Description Location		nentation nsibility
	Field;		
	Digital and physical special signage prepared by CCSF for orientation to NPS sites;		
	Web-based event special-event information, possibly through a free cell phone application, and printed material, on race schedule, safe bike routes, visitor orientation information, transit schedules, etc.		
TRA-4	Presidio and Other NPS Sites Roadway Management Strategies. Chapter 4, Transportation Table TRA-25 and Table TRA-26 present the roadway management strategies determined as part of this transportation analysis by alternative and profile day. These roadway management strategies would be operationalized by the City for adjacent roadways to parklands in San Francisco, in coordination with NPS and the Trust. The NPS and Trust will operationalize those measures related to parklands and Trust roadways identified therein for coordination with the City. These would both use a set of trigger points to initiate roadway restrictions for the various profile days for 2012 and 2013; the ICS Operations Section Chief and respective Division Supervisor would make a decision for either NPS or Trust based on observable conditions, past experience, professional judgment and take action. The Roadway Management Strategies outline the actions and responsible agencies for such.	NPS and Presidio Trust/A greemen t and/or Permit	CCSF in concert with NPS and Presidio Trust and other agencies
	The roadway management strategies identify San Francisco waterfront access roads to be restricted and/or temporarily redesignated for bike, transit, and pedestrian use during peak and medium high weekend race days in 2012 and 2013. It also identifies where there is a need for re-routing traffic and traffic management, such that principal intersections (adjacent to or providing access to parklands) that fail would be managed by CCSF traffic and parking control officers to facilitate improved movements and reduce adverse impacts. On days with restricted access, for example, to Mason Street and McDowell Avenue, public access would be supported with a short loop shuttle from the Presidio Transit hub to Mason Street and		

Meas ure	Measure Source/ Description Location	Implen Respon	Implementation Responsibility	
	required to sign up in advance for special permit access for the peak AC34 weekend days when such roadways are restricted. Restricted NPS, Trust or CCSF roadways/areas, designated in these tables, would include, but not be limited to:			
	In San Francisco, the area north of Bay Street east of Van Ness Avenue and Fillmore Street, the area north of Chestnut Street between Fillmore Street and Lyon Street. In addition, access to Upper Fort Mason would be restricted on high attendance event days.	·		
	Within the Presidio, Mason Street between Lyon Street and the Warming Hut, Long Avenue, McDowell Avenue between Lincoln Boulevard and Crissy Field Avenue, and Crissy Field Avenue.			
	Within the Marin Headlands, Conzelman Road between Alexander Avenue and McCullough Road, and the Barry-Baker tunnel.			
	Chapter 4, Transportation Table TRA-25 and Table TRA-26 present the roadway management strategies for the action alternatives for 2012 and 2013 conditions for the peak weekday and two weekend profile days. Roadway management strategies for other profile days are noted in footnotes to these tables.			
TRA-	Traffic Control Officers at Intersections. Traffic control officers at intersections would facilitate bicycle and pedestrian flows, to reduce overall delays at intersections.	NPS and Presidio Trust/A	CCSF in concert with NPS and Presidio Trust and other agencies as applicable	
	Within San Francisco, at intersections identified operating at LOS E or LOS F on weekend event days, and at other key intersection, traffic control officers, SFPD, or NPS Park Police, as appropriate, would be deployed during peak and other congested race periods in 2012 and 2013 to assist with traffic control. CCSF parking and traffic management, and SFPD would manage non-federal intersections and USPP and NPS would manage internal NPS and Presidio Trust intersections. A combined CCSF and USPP would manage the interface intersections between federal lands and CCSF jurisdictions.	greemen t and/or Permit	аррисаок	

Meas ure	Measure Source/ Description Location	Impler Respon	nentation nsibility
	North of Golden Gate bridge, CHP and NPS would manage traffic intersections under their jurisdiction, such as northbound and southbound Highway 101 ramps to Alexander Avenue, Alexander Avenue and Danes Drive, and other adjacent intersections to Fort Baker and the Marin Headlands, including the Fort Baker-Barry tunnel.		
TRA-6	Enhanced Muni 22-Fillmore, 28-19th Avenue, and 43-Masonic Bus Service. SFMTA would provide additional bus service on the enhanced 22-Fillmore, 28-19th Avenue, and the 43-Masonic routes. The three enhanced routes are presented in Chapter 4, Transportation Figure TRA-8, and would include:  22-Fillmore Short - The 22-Fillmore Short would run local between Marina Boulevard and McAllister Street, where there is a trolley coach turnaround loop. It would connect with the 30-Chestnut, the augmented 30X-Marina Express and 30L-Marina Limited, the 45-Union/Stockton and 41-Union Street lines, and the 24-Divisadero, 1-California, 2-Clement, 3-Jackson, 38/38L-Geary, 31-Balboa and 5-Fulton lines. Fillmore Street has one travel lane in each direction, and therefore is too narrow to effectively run limited stop service (the limited stop buses would not be able to bypass the local buses). The stop closest to NPS sites would be at Fillmore Street and Jefferson Street (Note: to be confirmed by SFMTA).  28-19th Avenue Short - The 28-9th Avenue Short would run between 19th Avenue and Judah Street (N line) and the Golden Gate Bridge Toll Plaza. This enhanced route service would run as a local, and referred to as a short line to differentiate this short line from the 28L-19th Avenue Limited that currently	NPS and Presidio Trust/A greemen t and/or Permit	CCSF
	runs on a different route, and because there are only two local-only stops between Judah and the Toll Plaza (at Irving and at Balboa). The stop closest to NPS sites would be at the Golden Gate Bridge Toll Plaza.		
	The temporary Doyle Drive creates over a mile-long barrier separating the Presidio from Crissy Field, between McDowell Avenue in the west and the Richardson Drive Francisco intersection in the east. Terminating the route at the Toll Plaza would keep the bus from the additional congestion along the		

Meas ure	Measure Source/ Description Location		mentation nsibility
	temporary Doyle Drive, and it would serve the Fort Point and west end of the Crissy Field viewing places. All the other SFMTA buses serve the east side of the Presidio. From the Toll Plaza, spectators would be able to walk down the hill or connect with the Golden Gate Transit Route 4 bus, other GG buses, and the Presidio shuttles.		
	43-Masonic Limited - The 43-Masonic Limited would run between Forest Hill Station (connecting with the K, L, M & T lines) and the current terminal at Chestnut and Fillmore. The limited stops would be at transfer locations: FHS; 9th & Judah; Carl & Cole; Masonic at Haight, Hayes, Fulton and Turk; Presidio & Geary, Presidio & California, Chestnut & Fillmore. The 43-Masonic Limited would also stop at the intersection of Presidio Boulevard/Letterman Drive to serve the inner part of the Presidio, and at the intersection of Lombard/Lyon for access to the east end of Crissy Field (via the intersection of Richardson Drive/Francisco Street).		
	Service would be provided at 10-minute headways between buses on peak weekend event days in 2012 and 2013.		
TRA-	Expanded Shuttle Service. Existing services between Downtown and the Presidio transit hub, and from there to Crissy Field will be increased with routes adjusted in response to the nature of the event day and observed demand on the shuttle routes, such that average headways of 10-15 minutes for the Crissy Loop from Presidio Main Post, and average headways of 15-30 minutes for the Downtown to Presidio shuttle, could be expected during peak weekend event days.	Presidio Trust Agreem ent and/or NPS Permit	CCSF in coordination with Presidio Trust & NPS
	Chapter 4, Transportation Table TRA-25 and Table TRA-26 present the service enhancements for the action alternatives for 2012 and 2013 conditions for the various profile days.		

Meas ure	Measure Source/ Description Location	Imple: Respo	nentation nsibility
TRA-	Transportation Enhancement Measure: Golden Gate Transit Augmented 4 Short Route	NPS Permit	CCSF funding of Golden Gate Transit Authority
	On peak weekend event days during AC34 2012 and 2013, an augmented Golden Gate Transit 4 Short route would run between the Manzanita park-and-ride lot (at the U.S. 101/Hwy 1 interchange) and San Francisco, with potential to stop at FT.Baker, and at Vista Point in the northbound direction, in order to serve the Fort Baker and Marin Headlands area. The Augmented 4 route plus the Augmented 10 would operate at approximately 7.5-minute average headways between toll plaza and Van Ness Avenue, depending on traffic congestion.		
TRA-9	Visitor Use Management & Monitoring Strategies. Visitor Use Management and Monitoring strategies would be developed for NPS AC34 primary venues and viewing areas affecting NPS lands and facilities with management actions which could be implemented to mitigate adverse impacts of crowding on access as well as provide for orientation and information to insure smoother visitor flows on arrival and departure from the shoreline areas.	NPS Agreem ent and/or Permit	CCSF for funding and implementation, in coordination with NPS and Presidio Trust
	Demand distribution strategies implemented by the Project Sponsors would proactively manage the distribution of spectators, and would include on-approach strategies that would provide guidance to spectators as they approach the event areas. On-site crowd management strategies would include management actions, such as bicycle separations from pedestrian flows at affected areas, and a Presidio shuttle that serves Mason St. and Crissy field, to ensure visitor safety, minimize congestion at key locations, and optimize distribution of visitors.		
I .	Management actions would be location-specific to reflect the different peaking characteristics and spectator volumes for the various locations. Crowd levels would be monitored during the events by the NPS through the Incident Command System in concert with CCSF staff. Visitor use management and monitoring would include the following:		
	Personnel - Staffing plans would be developed for the various		

Meas ure

# Measure Source/ Description Location

Implementation Responsibility

spectator attendance levels for each viewing location. Both the headcount requirements and the labor mix would be driven by combined visitor flow and destination estimates, and NPS Event Management experience. For the lowest attendance levels, crowds would be managed primarily by law enforcement and ICS personnel, except that resource monitors would be in place for all event days per Section 7 permit Conservation Measures. To accommodate higher attendance levels and pathway flow rates, additional law enforcement personnel would be scheduled, as incident rates would increase in proportion to visitor flow volumes and crowding levels. Personnel staffing would be planned as a mix of static and "floating" positions; floating positions would be responsible for area coverage, whereas stationary positions would manage critical visitor flow points to location (including at intersections to facilitate pedestrian crossings) as situations warrant. Some shift occurrences would be planned in advance, such as for the beginning and ending of major events. SFPD would provide additional commissioned officers who would work with NPS in NPS areas during AC34 race days, especially on 2012 and 2013 weekends and Fridays.

Barriers, Barricades, Fencing and Other Flow Management Equipment – A mix of soft barriers (e.g., removable aesthetic flow management guides) and hard barriers (sawhorse signs and portable parade barriers) provided by the City, as needed by NPS, would be stationed at key entry points. This equipment would either be set in place or removed, as necessary according to site conditions. Soft barriers would be used primarily to frame entry and exit points, and to steer arriving and departing visitors through the defined entry points when very crowded or congested. Hard barriers would be used when it is necessary to temporarily restrict or suspend access into a given area – usually when conflicts in flow of different modes may occur or the maximum safe crowding condition has been reached in a given area, or in response to urgent safety considerations. When this equipment is in place, crowd control personnel would be assigned to support visitor management, re-direct the visitor flow to nearby areas, and to be in position to quickly remove this equipment once adequate public space has become available.

Meas ure	Measure Source/ Description Location	Implementation Responsibility
	Signage – Signage would be installed to call attention to key services and entry points on City property adjacent to NPS sites, and to provide visitors with way-finding options at key decision-making points. The signage, developed by the City, would integrate directional and informational components to educate and alert visitors on how to navigate to/through the impacted areas. Signs would be designed to be seen from a distance and during peak crowding conditions.  CCSF signage would be sized and elevated with simple text and universal icons representing specific services (restrooms, information, first aid, etc.). Any signage on NPS lands would conform to its sign regulations.  Safety Measures (dynamic) – Although all policies in effect within the NPS lands would remain in effect, some additional protective measures would need to be implemented that are event-specific, such as public path zones in which bikes must either be walked, or not be permitted at all. For example, the high volumes of pedestrians and bicyclists expected along the SAFR Promenade during peak AC34 conditions may necessitate a walking-only policy during many of the AC34 events, as would the pinch-point at Ft. Mason. City staff or "ambassadors" would be stationed by CCSF near these congested bike/ped areas (ie. Ft. Mason/Gashouse Cove entry, Laguna and Bay St, etc.). Other joint measures would be planned by NPS, Presidio Trust and CCSF to facilitate efficient loading and unloading of highly-attended viewing locations. Changeable Message Signs — Changeable message signs would be used by CCSF on city lands near parklands entry road points, including the southbound approaches of the Presidio Parkway, to guide arriving and departing vehicles and pedestrians, and to call attention to a major condition or service as necessary(such as by providing directions to the central bus pickup location immediately adjacent to parklands).  Two-way Radios – Two-way interoperability and radio communication would be facilitated by the City to insure that	
,	key NPS and City IC staffl involved in crowd control could have immediate communications for reasons of coordinated	

Meas	Measure Source/ Description Location	Implementation Responsibility
	crowd flow, safety and emergency situations Portable Public Announcement Systems – if necessary, portable public announcement systems (similar to those devices used by park tour guides) would be provided such that they could be used to maintain visitor safety at peak congested periods, and for emergencies. Equipment requirements would be determined based upon planned activity within each zone.  Information Stations – Information stations or hubs, as provided for by Project Sponsors, would be placed in the vicinity of key primary park entry points (e.g. Mason and	
	Marina Blvd, Jefferson St entry near SAFR. These stations would offer general information, viewing times and locations with expected low crowding levels, and transit information, and would also serve to shift demand away from crowded venues and times. Event viewing tips would be featured by the City at key arrival points, such as Aquatic Park and Marina Green (similar to the tip board program featured at the Disney theme parks).	
	Special Activity Programming – Additional programmed activities supplementing the AC34 races may be scheduled at permitted venues near the event viewing locations. Although these activities would function primarily to enhance the overall spectator experience (due to gaps between races), these would also be used to strategically manage inbound and outbound pedestrian flow at the viewing locations. For example, scheduling a popular activity or performance at Marina Green immediately after a major race event would serve to spread the departure rate of spectators across a larger period of time, thus reducing the intensity of roadway congestion and peak demand on public transportation services in that vicinity.	
	Communication Channels – Communication channels and real-time information would be managed and disseminated by CCSF and ACEA (Project sponsors) in coordination with jurisdictional IC teams. This may include traditional media, web, email, twitter, and SMS, to aid in the distribution of demand across all event activities. Some of these, such as SMS blasts and tweets, would also help to inform pedestrian spectators while on site, such as board sailors, and other water	

Meas ure	Measure Source/ Description Location	Implementation Responsibility		
	recreationalists, as to when races are over, or to advise visitors to avoid certain exit routes due to congestion.			
TRA-10	Temporary Bicycle Lanes/Routes  During AC34 2013, SFMTA will implement temporary bicycle lanes within the curb parking or curb travel lane on peak weekend event days (up to 4 days in 2012, and between 11 to 24 days in 2013). Streets where temporary bicycles could be implemented on all or a portion of the street include:	NPS Permit;	CCSF/SFMTA	
	Van Ness Avenue between North Point Street and Bay Street (within curb bus lane)  Bay Street between Van Ness Avenue and Laguna Street (within curb parking lane and right-turn-only lane)		·	
	City traffic control officer(s) will be stationed at the Laguna/Beach Street pinch point. NPS and CCSF will investigate potential improvements at this location, to determine if short-term improvements to provide additional bicycle and pedestrian right-of-way could be implemented for AC34 2012 or 2013 events.			
	A temporary alternative bicycle route on Cervantes Street between Bay Street and Marina Boulevard will be signed. On peak event days, temporary parking restrictions would be implemented on the east curb of Cervantes Street north of Bay Street (a bicycle lane is currently provided on Bay Street between Laguna Street and Cervantes Street).			
TRA-	Temporary Bicycle Parking. Project Sponsors would provide temporary secure and managed bicycle parking at key locations serving the NPS sites for 2012 and 2013 peak and medium high weekend race days (four days for 2012, and 11 days in 2013), consistent with the bicycle parking demand identified in Chapter 4, Transportation Table TRA-27 for NPS sites. The location of the bicycle parking stations and number of bicycles to be accommodated at each station would be finally determined by the NPS, in consultation and coordination with, and as provided for by, CCSF. These would include, at a minimum, addressing Crissy Field and SAFR needs in 2013.	NPS and Trust/A greeme nt and/or Permit	CCSF and ACEA	

Meas ure	Measure Source/ Description Location	Implementa Responsibil		
TRA- 12	NPS Parking Management Strategy. NPS would actively manage parking lots/area at Crissy East, in San Francisco, on all peak weekend event days ((4) days for Alternatives E, and 11 days in 2013), and Battery East for (2) days in 2012, and 5 days in 2013. In addition, Crissy East would be actively managed on (13) other average race weekend days, and (8-10) peak race weekdays in 2013 when the races are offshore. Fort Baker and Conzelman Road in the Marin Headlands would be actively managed on (2) peak race weekend days in 2012, and (5) peak weekend race days in 2013, as needed.	NPS and Trust/Agreeme nt and/or Permit	CCSF (for funding);NPS and Trust for implementation and coordination	
TRA-13	NPS Staff, Park Partners, Residents, Deliveries and Registered Program Participants Access to Presidio and other NPS Sites. NPS and the Trust in coordination with the City would develop access strategies for NPS staff, Park Partners, residents, deliveries and registered program participants. This would be developed to provide access to SAFR, Fort Mason, Fort Baker/Marin Headlands, and Crissy Field during peak and medium-high weekend race days when some roadways would be closed to the general public. The strategy would include an identification of vehicular access points and control methods into the restricted areas, alternative means of access (e.g., shuttle bus service) and parking locations, and preferred days and times for access (e.g., before 10 a.m.) and deliveries (weekdays only). Most permits/identifications issued to those other than staff, employees and residents would require prearrangements, most likely performed via internet. On-site customer parking, when available, would be strictly limited to the duration of the visit.	NPS Permit	CCSF in coordination with NPS and Presidio Trust	
	Visitor Use-Experience Management and Protection Measures			
VUE-	Incident Command System. NPS would implement an Incident Command System (ICS), commensurate with need and level of funding provided by project sponsors, as described in Management and Protection Measure BIO-1, above.	NPS and Trust/Agreeme nt and/or Permit	CCSF (for funding)/NPS and Presidio Trust (for implementation in coordination with other agencies)	
VUE-	Visitor Use Management & Monitoring Strategies. NPS would implement visitor use management and monitoring strategies,	NPS Agreement	CCSF (for funding and	

Meas ure	Measure Source/ Description Location	Implementation Responsibility	
	as described in Management and Protection Measure TRA-9, above. These strategies would be implemented at primary venues and viewing areas affecting NPS lands and facilities, with management actions which could be implemented to mitigate adverse impacts of crowding and to ensure the protection of park resources.	and/or Permit	implementation in coordination with the NPS and Presidio Trust
VUE-3	Resource Management & Monitoring Program. NPS would implement a Resource Management & Monitoring Program, as described in Management and Protection Measure BIO-3, above. At a minimum, cultural resource monitors would observe the following locations: Batteries Spencer, Yates, East, and Ridge; North of Battery Duncan; Hyde Street Pier Historic Fleet; and Upper Fort Mason.	NPS/Agreeme nt and/or Permit	CCSF for funding)/NPS (for implementation)
VUE- 4	National Parks Event and Operations Plan. NPS would prepare and implement a National Parks Event Operations Plan, as described in Management and Protection Measure BIO-4, above which would detail NPS locations of fencing, restrooms, emergency medical services, and other major site provisions.	NPS/CCSF Permit	CCSF(for funding)/NPS, Presidio Trust, and CCSF (for implementation)
VUE- 5	Educational Programming at AC34 Venues. NPS would emphasize ocean stewardship programs within existing park and partner interpretive programs at Crissy Field and Fort Baker as provided for by ACEA as project sponsor. In addition, the Maritime Museum at SAFR may produce maritime-themed interpretive displays in partnership with other maritime museums or sponsors.	NPS/General Management Measure	ACEA in coordination with NPS
VUE-	Controlled Vessel Access to Aquatic Park & Horseshoe Coves. During race periods in 2012 and 2013, Aquatic Park Cove would be restricted to permitted and closed to all other unauthorized vessel traffic. During 2013, Horseshoe Cove would be restricted to permitted vessels. With a permit, visiting vessels would be allowed to anchor in the cove. On race days in 2012 and 2013, NPS would receive assistance from the USCG marine enforcement unit to manage Aquatic cove access restriction. Unless explicitly authorized by NPS, motorized vessels would not be permitted within Aquatic Park or Horseshoe Coves.	NPS/Managem ent Measure	NPS in cooperation with USCG;ACRM

Meas ure	Measure Source/ Description Location	Implementation Responsibility	
VUE-7	Temporary Visitor Support Facilities. The CCSF would provide for the placement and maintenance of portable restrooms at NPS/Trust sites requiring them (e.g., Crissy Field, SAFR, Fort Mason, and Fort Baker), and with a portion of the restrooms meeting ADA standards, during the race periods in 2012 and 2013, such that waiting times are no greater than under existing busy days. CCSF would also provide additional restrooms and hand washing stations, as needed, during peak visitation periods. Portable restrooms, and any other temporary facilities within NPS parklands, would be provided by the CCSF, subject to approval by NPS or theTrust(depending on jurisdictional authority), and be of a nature and type that does not impact the NPS/Trust parklands scenic values and aesthetic. The cleaning regimen of portable restrooms would be maintained to ensure hygienic and clean visitor conditions. Large Debris Waste and recycling containers would be provided by the CCSF, subject to approval by NPS/Trust for their respective lands, be of a nature and type that does not impact the NPS parklands scenic values and aesthetic, meet NPS sustainability requirements, and meet demand requirements for weekday and weekend visitors. The waste collection regimen would be managed by the CCSF to ensure no overflows through regular collections and haul-outs during the day and before the next day begins, depending on visitation levels, increasing in frequency during peak afternoons and early evenings, to ensure that park sites are kept garbage-free and clean.	NPS and Presidio Trust/ Agreement and/or Permit	CCSF funding in coordination with NPS implementation
VUE- 8	After Hours Activities at Alcatraz Island Private events at Alcatraz Island would be limited to the hours of 7:00pm and 11:00pm, after normal public visiting hours, so as not to interfere with regular visitation to the island and to minimize potential impacts to the ferry embarkation point at Pier 31 ½. Such events could occur twice in 2012 and five times in 2013 on evenings when no other public uses are present, and in accordance with all NPS special event regulations. Private event activities would be limited to the cellhouse and include a programmatic component that increases understanding of the site significance through an interpretive tour. No outside lighting would be added for these events. Private events at	Separate NPS special use event permit, if applicable	NPS;ACEA

Meas ure	Measure Source/ Description Location	Implementa Responsibi	tion ity	
	Alcatraz Island would be authorized under a separate special events permit and NPS would limit the number of participants based on the type of event. However, it is assumed that such events would be limited to a maximum of 250 persons.			
VUE- 9	After Hours Activities at Fort Baker Pier There would be no programmed private AC34 events at Fort Baker Pier. Any one-time AC34-related use would be subject to the terms and conditions of a separate special use permit.	Separate NPS special use event permit, if applicable	N/A	
VUE- 10	There would be no programmed AC34 events at Crissy Field in NPS's parkland areas(Area A)	N/A	N/A	
VUE- 11	Timing of Programmed Activities at AC34 Spectator Venues. Unless otherwise authorized by NPS, publically programmed AC34 activities at SAFR would to be restricted to race weekends between the hours of 10am to 8pm.	NPS /Agreement and/or Permit	Project sponsors	
VUE- 12	Placement of Venue Amenities. All AC34 venue-related amenities, including concessions tents, information stations, temporary structures, portable restrooms and hand washing stations would be placed in locations that do not contribute to crowded conditions. All temporary event structures would be set back at least 25 feet from the Crissy Field Promenade and trails, including the Bay Trail, and be configured so as to minimize impacts to bay views. Other setback distances, at locations such as SAFR, would be dependent on siting and space availability so as to not contribute to further congestion or impede flow along promenades.	NPS and Presidio Trust/Agreeme nt and/or Permit	CCSF; ACEA-SAFR, as applicable.	
VUE- 13	Fencing and Signage for Sensitive Resources and Visitor Protection. The CCSF would provide for the installation of fencing and signage, as necessary, to protect natural and cultural resources, and to manage visitor flow impacts, adjacent to NPS lands. Temporary fencing would also be installed to ensure visitor safety. Fencing location/length and signage type would be determined in consultation with the appropriate land authority where impacts are anticipated. In any case, these fences would be light enough for removal, or left in place, if warranted, between 2012 and 2013 race events, but substantial enough to deter visitors from entering the fenced off areas.	NPS and Presidio Trust/ Agreement and/or Permit	CCSF(for funding); NPS (for implementation on NPS lands)	

Meas ure	Measure Source/ Description Location	Implementation Responsibility	
,	Informational and regulatory signage would mark sensitive areas and state that entry into these areas is prohibited.  Installation of temporary fencing required by the land authority would be completed no later than one week prior to the commencement of the 2012 and 2013 events and programs.		
VUE- 14	Public Safety and Emergency Response. To ensure continued public safety and access to emergency services, CCSF-funded emergency medical support would be stationed at various locations in San Francisco near and within GGNRA and SAFR (including augmented San Francisco Fire Department (SFFD) paramedic patrols at Crissy field, Fort Mason and SAFR) on all 2012 and 2013 race weekends and peak race weekdays; and a dedicated paramedic unit thru NPS that would be available for Conzleman Road and Marin Headlands during peak weekend periods when access is impeded by Alexander Avenue and tunnel traffic (i.e., up to approximately 4 days in 2012, and 11 days in 2013). Advanced Life Support (ALS) emergency responses would be maintained, such that response times would average 5 minutes or less from time of notification, 90 percent of the time, in accordance with existing standards throughout the City of San Francisco for emergencies warranting ALS. Crowd control measures would be employed to ensure that all emergency access lanes for SFFD can be put into effect in response to emergencies as needed at a minimum of 14 feet wide at all times and that a minimum of 3 feet of clear space is maintained around fire hydrants.	NPS and Presidio Trust/ Agreement and/or Permit	CCSF (for funding /NPS and Presidio Trust (for implementation)
VUE- 15	Unique Visitor Uses of Marine Area. To facilitate continued unique uses of marine areas in parklands, the following will be instituted: non-motorized small craft zone off of Crissy Field would be established for 2012 and 2013; a communications system would be established to alert recreationalists and mariners when races are over, and marine areas re-opened; permitting of controlled access for non-motorized boats would be established for Aquatic Cove to ensure safety of swimmers; and rental storage lockers for sailboarders would be made available by CCSF on City property east of East Crissy field for the peak and high medium-peak weekends, at a minimum, when access may be difficult in the afternoons.	NPS/Agreeme nt and/or Permit; USCG SLR	ACRM in cooperation with USCG, NPS; and CCSF for board lockers

Meas ure	Measure Source/ Description Location	Implementation Responsibility	
VUE- 16	Visitor Satisfaction Related to Parklands Facilities. (1) Portable restrooms and hand washing stations, and any other temporary facilities at NPS sites (e.g., Crissy Field, SAFR, Fort Mason, and Fort Baker), would be provided by the project sponsors, subject to approval by NPS/Trust, and be of a nature and type that does not impact the NPS/Trust parklands scenic values and aesthetic. The cleaning regimen of portable restrooms, a responsibility of the project sponsors, would be maintained to ensure hygienic and clean visitor conditions. (2) Large Debris waste and recycling containers would be provided by the CCSF, subject to approval by NPS/Trust, be of a nature and type that does not impact the NPS/Trust parklands scenic values and aesthetic, meet NPS sustainability requirements, and meet demand requirements for weekday and weekend visitors. The waste collection regimen would be managed by the CCSF to ensure no overflows through regular collections and haulouts during the day and before the next day begins, depending on visitation levels, increasing in frequency during peak afternoons and early evenings, to ensure that park sites are kept garbage-free and clean. (3) The restoration/repair of damages to NPS/Trust park facilities, furnishings, and/or turf, would be completed by NPS/Trust maintenance staff, or their agents, whose expense would be reimbursed by the City pursuant to its Memorandums of Understanding and/or Permits with the NPS and the Trust respectively for their respective separate costs.	NPS/Agreeme nt and/or Permit; Trust Permit/ Agreement	CCSF
VUE- 17	Visitor Satisfaction Related to Parklands Facilities and Information kiosks, along with social media updates, would be provided by CCSF at the main entrance to SAFR and adjacent to Crissy field entrance at a minimum in 2013. Printed material about the weekly race schedule and a map of NPS temporary visitor support facilities and transit would be made available at that location and NPS and park partner primary visitor areas.	NPS Permit	CCSF
VUE- 18	Visitor Satisfaction, Safety, and Screening. Real-time information regarding ferry service delays to and from Alcatraz Island would be provided by ACRM to the point of sales locations or designated concessionaire operations contact. Alcatraz Island Ferry passengers and their carry-on items may be subject to additional security screening at points of	NPS/Special Events Permit	ACRM for real- time communication; NPS for security screening, if applicable, in

Meas ure	Measure Source/ Description Location	Implementation Responsibility	
	embarkation during race days.		concert with CCSF
VUE- 19	Temporary Bicycle Parking. SFMTA would provide temporary secure and managed bicycle parking at key locations, as described under Management and Protection Measure TRA-11.	NPS and Trust/ Agreement and/or Permit	CCSF
VUE- 20	Accessibility. The CCSF would develop and fund strategies for deployment/implementation by all land management agencies to enhance access for all persons with disabilities and seniors in full compliance with applicable accessibility standards. Such strategies would include: accessible regional-local transit, shuttles, way-finding, off-site accessible parking or shuttle connections to the San Francisco waterfront viewing sites with access paths or para-transit vans from key sites (eg. Presidio Main Post to Crissy field).	EIR; People Plan- Transportation Measures; NPS Permit	CCSF
	Visual Resource Management and Protection Measures		
VIS –	Temporary Weather Monitoring and Satellite Installations Restrictions. Any AC34 event-related weather monitoring and satellite equipment installed on NPS lands would be temporary, not interfere with existing operations (i.e., rooftop photovoltaic systems), be located as far from the water's edge as possible, and be subject to terms and conditions of an NPS special events permit and Section 106 of the National Historic Preservation Act, as applicable. In order to minimize obstructions of bay views, project sponsor would evaluate the potential for use of rooftop locations as an alternative to pier aprons for such installations. On Alcatraz Island, for example, such installations would be located in areas of limited visibility from visitor populated areas. Whenever possible, project sponsor would avoid the use of light or bright colored equipment for such installations, instead utilizing darker, earthen tones, to minimize contrast with the surrounding landscape. Project sponsor would also remove or cover equipment when not in use.	NPS/Agreeme nt and/or Permit	ACRM with oversight by an NPS resource monitor

#### IMPAIRMENT DETERMINATION

## 34th America's Cup Race Series

Alternative E: Selected Alternative

NPS Management Policies 2006 (§1.4) requires analysis of potential effects to determine whether or not proposed actions will impair a park's resources and values. The fundamental purpose of the national park system established by the Organic Act and reaffirmed by the General Authorities Act, as amended, mandates that NPS conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give NPS management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave resources and values unimpaired unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. Non-resource topics are generally not subject to impairment assessment. Whether an impact could lead to impairment depends on the particular resources that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. Impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. The following consideration of impairment only applies to resource impacts of the selected alternative.

The "park resources and values" that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

The purpose of Golden Gate National Recreation Area is "to offer national park experiences to a large and diverse urban population while preserving and interpreting the park's outstanding natural, historic, scenic and recreational values." Guiding principles for park management include sustainability, community-based stewardship, civic engagement, partnerships, regional collaboration and inclusion. The park's new General Management Plan (still in draft form) has identified park access to its diverse settings, coastal ecosystems, military fortifications and scenic qualities (as well as others not affected by AC34) as fundamental resources and values, e.g. those that directly contribute to the significance for which the park was established.

The EA evaluated impacts to the following resources discussed below: air quality (including greenhouse gases), soundscape, hydrology and water quality, soils and geology, cultural resources (including historic, archeological resources), biological resources (native plants and animals, species of special concern, marine and upland wildlife), and scenic features and visibility (visual resources). The impairment determination does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc. or impacts to resources not part of the National Park system, as these are not considered park resources or values.

Alternative E is the Selected Alternative. The FONSI includes the reasoning for selecting this Alternative as that selected by the agency team (NPS, USCG, USACOE and Presidio Trust) and environmentally preferable.

#### Air Quality-

For all alternatives, including Alternative E, sources of air emissions including of greenhouse gases would be primarily outside of park lands and result from in-water construction, construction

traffic and equipment, pile driving and dredge equipment. During the races, the support boats would emit pollutants, as would cars, buses and shuttles bringing people to the waterfront. Although the original proposed action (submitted by America's Cup Race Management or ACRM and identified as Alternative B in the EA) would have included venues on Crissy Field and other park lands, construction of bleachers, tents, media platforms, etc. requiring generators and bringing additional cars and transport vehicles to park lands, the Selected Alternative excludes venues and reduces visitation, lowering emissions from these sources, including of greenhouse gases (CO equivalents) to about 15% (2012) to 20% (2013) of those expected under Alternative B. The Selected Alternative also includes bike lanes, bike lockers, measures to encourage pedestrian visitor flow and traffic control officials to keep cars from idling at signals to the extent possible.

Emissions from spectator boats and "super yachts" coming to assist and view the races would be lowered through the use of on-shore power at some of the ports where they could tie up, substantially reducing air impacts from operations and allow the project to meet its air quality conformity standard requirements. However, emissions from these sources would remain similar across all alternatives. As a result, overall impacts to air quality (e.g. on and off federal lands and federally managed waters) from Alternative E are similar to those from Alternative B (and other alternatives), and range from minor adverse (VOC –volatile organic compounds; and CO- carbon monoxide) to minor beneficial (PM2.5 and NOx) in 2012 to moderate adverse (VOC) to negligible beneficial (NOx) in 2013.

Impacts to air quality on park lands from greenhouse gas emissions would be minor and adverse in both 2012 and 2013. This is a decrease from the original Sponsor Proposed Action of moderate impacts in 2013.

Section 176 of the federal Clean Air Act indicates federal managers can permit activities that do not conform to the state's CAA Implementation Plan (SIP). All of the alternatives would result in exceeding of the CO standard for conformity with the State Implementation Plan of 100 tons/year. However, air quality dispersion modeling, considered an acceptable tool to check initial gross totals, indicated 1-hour CO standards would not be exceeded. CO emissions would be no greater than 6.7 ppm, while the 1-hour federal standard is 35 ppm. The 8-hour CO concentration would be no greater than 4.2 ppm, below the federal standard of 9 ppm. Federal managers are advised to discuss projects or plans to determine the applicability of the conformity requirements. While the BAAQMD has not provided a letter of concurrence, the lack of objection from BAAQMD is considered tacit agreement that the project conforms to the SIP.

Scenic quality is a fundamental resource of the park, and several of the federal emissions standards are geared toward helping to prevent increases in ozone or particulates, pollutants that could affect the quality of the views at the park. While levels of these pollutants would not exceed state standards for conformity with the SIP, those from marine vessels (race support and spectators) would result in moderate impacts to VOC levels for a short time in 2013.

The impacts from air pollutants to park lands have been minimized through the removal of venues and related construction and visitation related emissions, addition of public transportation and measures to encourage alternative transportation. Dispersion modeling indicates AC34 will conform to the California SIP. All air quality impacts are short term; most are no more than minor

and adverse, and none rise to the level of significant as defined by NEPA. While moderate impacts to air quality in the Central San Francisco Bay from VOCs from race-related support or spectator boats would occur in 2013, the impacts would occur intermittently during a 60-day period and would not permanently alter scenic quality at the park. For these reasons, no impairment to park air or scenic resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

## Soils/Geology-

No geologic resources would be affected by AC34, and soils would generally be protected through new fencing where spectators are expected to either be crowded together or near sensitive resources (generally, these resources are cultural or wildlife or wildlife habitat of special concern), temporary restrictions on trails or areas, signs directing spectators toward hardened areas or trails and the use of resource monitors and law enforcement to ensure spectators remain outside fenced areas and away from sensitive, unfenced areas. Serpentine soils, which are unique and provide habitat for several plant species of concern, are located in areas of dense vegetation and steep hillsides where spectators are not expected. Dune sands would be fenced and monitored. Protecting and interpreting all natural resources including soils in the park are part of its purpose; because impacts have been minimized through these measures and would be short-term and no more than minor, no impairment to park geologic or soil resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

## Hydrology/Water Quality-

Sources of impact include dredging, trash, and discharges and spills from spectator boats. Spectator boats could idle 500 feet from Alcatraz or outside a non-motorized zone (extending 600 feet into the Bay from Crissy Field and Aquatic Park), but would only be able to anchor in existing marinas or temporary floating docks not in NPS managed waters. Protective measures that are part of the Selected Alternative include periodic inspections by the USCG of boats in the Bay, education and literature for all boaters on where sewage pump-out stations are located, as well as for rules regarding the handling of ballast water to prevent introduction of invasive aquatic species. Because Crissy Field will not be a venue, fewer spectators than under the original Sponsor Proposed Action and less trash in the water are expected. No race-related boats will be allowed in Horseshoe Cove, and those able to access Aquatic Park Cove will do so only with individual reservations and permits from SAFR. Dredging for pier pilings outside NPS managed waters (at the SF Port and Marina Green locations where AC34 "villages," temporary floating docks, etc. will be constructed) would increase turbidity, but would utilize clamshell buckets to minimize impacts, making them short term and minor. Reductions in dredging requirements on Port properties that are part of the Selected Alternative would also help in reducing impacts to water resources outside NPS jurisdiction from becoming more than minor. While park coastal water resources are considered a fundamental resource, because impacts from boaters and spectators to water resources under NPS jurisdiction have been reduced to the extent possible and are expected to be no more than minor, no impairment to park water resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

#### Upland Biological Resources, including Special Status Species

Sources of impact to upland park vegetation and wildlife include trampling of vegetation off trails, disturbance of wildlife from the presence of additional spectators, helicopter and fireworks noise and the visual/noise effects of AC72 sailboats and support boats. Listed or sensitive wildlife that may be affected include the western snowy plovers at Crissy Field, foraging and rafting waterbirds in the Bay, and Mission blue butterflies at Fort Baker. A number of listed or sensitive plant species, including Presidio Manzanita, Marin dwarf-flax, Presidio clarkia, San Francisco lessingia, and California seablight, grow in the some parts of the larger project area, including in rare serpentine soils along the bluffs east and north of Baker Beach (the first four) or in the dunes or marsh of Crissy Field (California seablight). Other, non-listed but sensitive plants are associated with these same locations, as well as Fort Point and in the Marin Headlands. While Baker dunes and beach are not viewing areas for the race, it is possible that this area would experience greater impacts during the races from visitors displaced by AC34 spectators at other park locations.

Impacts to these communities and species would generally be minimized because of their location (for example, Baker Beach cliffs are not a viewing location), difficulty of access (slopes on the east side of Fort Baker or in the Marin Headlands are steep and somewhat dangerous) and the nature of the vegetation itself (e.g. riparian scrub is dense and thorny). However, where sensitive plants, wildlife or wildlife habitat is accessible and is likely to be affected by spectators, fencing, resource monitors and/or restrictions would often be put in place to ensure protection. For example, fencing at Crissy dunes would be strengthened and fencing would be installed at Crissy Wildlife Protection Area. Signs and restrictions to keep spectators from moving off trails and into Mission blue butterfly habitat, as well as resource monitors if needed, would be used at Fort Baker and in the Headlands. Where single individuals or small populations of listed or sensitive plants grow outside of fenced or otherwise protected areas (such as where monitors are located or signs are placed), they may be subject to additional trampling from spectators seeking views of the races.

Additional protection for Crissy Field area wildlife and vegetation is likely from the shift of the race course east from its original proposed location for 2012. Views from Crissy Field would be shorter-lived and not centered off Crissy Field, and spectators are more likely to try to see the races from Marina Green, Fort Mason or SAFR, where similar sensitive resources are not present. Eliminating venues from Crissy Field, and to a lesser extent from Fort Baker, also reduces the size of crowds and potential impacts from off-trail use and human disturbance.

Coastal vegetation and wildlife, including threatened, endangered or rare species, are a fundamental park resource. However, protection measures minimize impact from human disturbance and trampling, and would result in no more than minor impacts.

Noise from fireworks and AC34 support and spectator boats, as well as from 3 AC34 helicopters flying over and around the races and the presence of the very large AC34 racing yachts themselves, could have impacts to coastal wildlife, particularly to nesting seabirds at Alcatraz. To minimize the intensity of this impact, fireworks have been eliminated in 2012 from the original Sponsor Proposed Action, and would take place at a distance of at least 1.5 miles from Alcatraz at Piers 27-29 in 2013. Helicopters associated with AC34 would be required to maintain a 1000-foot minimum elevation over all park lands, except at Alcatraz. At Crissy WPA, helicopters would

also not be allowed to approach closer than 1000 feet of the mean high tide mark. At Alcatraz, helicopters would need to remain 1000 feet away and 2000 feet above the island to protect colonial nesting seabirds. This measure was added in response to GOGA monitoring, which indicated in at least one year of surveying that cormorants would flush their nests when helicopters were overhead at 1000 feet. In addition, no AC34 related boats, including racing yachts, support or emergency boats, or spectator boats would be allowed closer than 500 feet from Alcatraz. The Selected Alternative also eliminates all venues from Crissy Field, including amplified sound and jumbo viewing screens in the original Proposed Action. As noted above, although coastal vegetation and wildlife, including special status species, are fundamental park resources, impacts from AC34 to them would be short term and no more than minor with protection measures in place. Impacts would not be likely to adversely affect listed species (USFWS concurrence 07/31/12). Therefore, there would be no impairment to park upland biological resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6.

## **Marine Biological Resources**

Generally, impacts to marine biological resources would be in waters not managed by the NPS. However, eelgrass in Horseshoe Cove adjacent to Fort Baker would be protected by permitting only boaters that currently use the harbor and marina to continue to use it during the races. The closest source of underwater noise to NPS managed lands and waters would be from pile driving at Marina Green at Lower Fort Mason. By about 15 feet from the location where pile hammers are used, sound levels drop to those considered ambient. Noise from the support or spectator boats is also expected to drop off rapidly with distance, and be at about 40 decibels at 100 yards. As a result, impacts to marine life in waters under NPS jurisdiction would be negligible. Although marine life is a fundamental park resource, because impacts are negligible and minimized through the use of protection measures, no impairment to park marine resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

## **Cultural Resources**

The primary concern with cultural resources is the impact of trampling, turf degradation, erosion, or crumbling or other structural damage to cultural resources, as well as potential graffiti, artifact collection and other vandalism. Alternative E includes no ground disturbance, and archeological resources would not be affected. The potential impacts to turf or structures would be minimized through the use of fencing, signs, access restrictions and/or resource monitoring as appropriate to each potentially affected location. The potential to damage structures, such as Hyde Street Pier, Muni Pier, or the East and West Roundhouses at SAFR could be moderate or major without protection measures, but with them (access restrictions in this case), impacts to all possibly affected park cultural resources would be completely eliminated or negligible. No adverse effects to park cultural resources under the NHPA Section 106 requirements would occur. While fortifications and military installations are a fundamental park resource, because protection measures would keep impacts to negligible and short term, no impairment to these park cultural resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

## Soundscape

The impacts to the park soundscape from AC34 would be the result of construction at Marina Green, where the 2012 village would be built, from car traffic and from helicopters during the event. Construction noise impacts would be limited to lower Fort Mason, and would be negligible or minor and short-term. Noise effects that were part of the original proposal and stemmed from loudspeakers, concerts, amplified sound and jumbotrons at both Crissy and at SAFR, have been mitigated by the removal of venues at Crissy. Some noise from construction of tents or of spectator related services at SAFR on weekends in the Selected Alternative may be detectable (i.e. minor in intensity). Car traffic noise would increase by 0.1 dBA on peak weekdays to 0.3 dBA on peak weekends at various intersections in the park from AC34 spectators. On Fleet Week weekend days in 2012, total increased noise from traffic would measure 1.3 dBA over existing conditions at Lincoln Blvd. between 25th Avenue and Hoard Road and would total 63.2 dBA from AC34 related traffic, a moderate cumulative impact. Otherwise, traffic noise would cause negligible or minor impacts to soundscapes. Helicopter noise over Crissy Field was calculated for the original Sponsor Proposed Action, and would have resulted in hourly noise increases at Crissy Field by 2.9 to 3.1 dBA and a total of 59.9 to 60.1 dBA, a moderate short term effect. Shifting the race east by ½ mile in 2012 would like reduce the predicted 3.1 dBA increase at Crissy Field. In addition, helicopters would not be able to fly over any park lands, including at Fort Mason and Fort Baker, at an altitude below 1000 feet. At Alcatraz, helicopters would not fly lower than 2000 feet within 1000 feet of the edge of the island. The benefits of this height restriction were not compared in the EA relative to the 1000 feet restriction that was agreed upon as part of the original Sponsor Proposed Action. However, impacts to Alcatraz soundscape from helicopters from the original alternative would be minor and short term and those from the Selected Alternative would therefore be no greater than minor.

Soundscapes are not called out as a fundamental resource at GGNRA; however, the contrast between urban environments and undeveloped spaces is and natural quiet inside the park would contribute to this contrast. Moderate short term impacts from helicopters over Crissy Field predicted for the original Sponsor Proposed Action may be lessened from shifting the race location and height restrictions over park lands. Moderate short term impacts from traffic noise at one location adjacent to the park would occur as a result of the combined impacts of AC34 and one weekend during Fleet Week in 2012. However, these impacts are short term. Because all feasible mitigation measures have been applied to AC34 related sources of noise and remaining impacts are all short term, and are primarily minor but no more than moderate, no impairment to park soundscapes as defined in NPS Management Policies Sections 1.4.5 and 1.4.6 would occur.

#### Visual Resources

Impacts to visual resources at SAFR from the Selected Alternative compared to No Action would be limited for several reasons: the area is already crowded and cannot fit many more spectators, SAFR has multiple locations for viewing the Bay, and SAFR has seating for spectators who would not block viewing by non-race visitors. Cumulative impacts to scenic vistas from crowding during 2012 could be moderate on Fleet Week weekend, as the race would be moved east ½ mile and would pass directly by SAFR's shoreline. Similar moderate impacts related to crowding and the inability to see the Bay from both SAFR and Crissy Field in 2013 are also anticipated.

Negligible to minor impacts at Fort Mason, Fort Baker, Marin Headlands and Alcatraz visitors from crowding are expected. Because venues have been eliminated from all park lands except SAFR on weekends, no impact to Crissy Field or Fort Baker park landscapes from structures are anticipated. Although venues are possible at SAFR, only small booths or other structures consistent with art shows on the upper lawn area and to the east of the amphitheater could be temporarily constructed. These small tents would block views of the Bay from Beach Street, but not from the Bay Trail. Impacts would be minor and temporary. The dramatic setting of GGNRA is a fundamental park value. Although some impacts at Crissy and at SAFR would be moderate during parts of the AC34 race period, they would be short term and fully restored when the race is over. Therefore, there would be no impairment to park visual resources as defined by NPS Management Policies Sections 1.4.5 and 1.4.6.

## CONCLUSION

As guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is both Superintendents' professional judgment that there will be no impairment of park resources and values from implementation of the Selected Alternative.