



DEPARTMENT OF THE AIR FORCE
60TH AIR MOBILITY WING (AMC)

7 Dec 98

60 SPTG/CC
400 Brennan Circle
Travis AFB CA 94533-5049

General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Dear Sir or Madam

My staff has reviewed the Draft Environmental Impact Statement (DEIS) and Proposed Plan for Fort Baker. Our review focused upon identifying the potential impacts the Fort Baker Plan, if implemented, will have upon the active-duty military members, retirees, and dependents currently authorized to use East Fort Baker's marina facilities. Although the DEIS and Proposed Plan identify some potential impacts to Presidio Yacht Club (PYC) members who currently moor their boats at the Travis AFB Marina, these documents do not identify the impacts that closure or displacement of this facility will have upon active duty military members and their dependents. We submit the following comments for your consideration.

Travis AFB Comment 1: The DEIS and Proposed Plan do not adequately identify or discuss the impacts resulting from the displacement and relocation of the Travis AFB Marina.

The DEIS at paragraph 4.2.11.2 states that the preferred alternative will result in the "displacement" of current PYC users and that current members "would be required to travel greater distances to find facilities at comparable rates to those currently sponsored by Travis AFB and member volunteer maintenance efforts which keep rates low." This paragraph does not accurately depict the effects of Travis AFB Marina closure. We are not aware of any marina facilities to which the Travis Marina could relocate and thereafter establish rates comparable to those currently available. Market research reveals that current users (to include both those who permanently moor boats at the facility and those who rent or lease available equipment and services on a daily basis) will incur substantially higher costs even at facilities in much less desirable locations. Faced with the lack of relocation alternatives, the EIS must fully address the impacts of relocating the PYC and Travis Marina. The impact analysis should be based upon relocation to a facility offering comparable services to that offered by the current East Fort Baker facility. The impact analysis should include the costs of activity relocation, short- and long-term financial impacts to users resulting from higher user fees, and environmental issues associated with building a replacement facility for each alternative identified in the EIS that would require relocation of the Travis AFB Marina and PYC.

1-A

Travis AFB Comment 2: The DEIS and Proposed Plan do not address or discuss morale and welfare impacts that closure of the Travis AFB Marina will have upon active duty military members.

It is well-recognized fact that maintaining troop morale plays a vital role in ensuring readiness of the armed forces. The availability of affordable and high-quality recreational and entertainment opportunities for our active-duty military members is an essential element in maintaining morale. Unfortunately, economic barriers present in high cost-of-living areas often deny many military members and their dependents access to entertainment and recreational opportunities.

1-B

AMC -- GLOBAL REACH FOR AMERICA

Unlike civilian salaries that often reflect the economics of the local community, the salaries of military members do not increase in proportion to the cost of living in a high cost of living area. When stationed in a high cost area such as San Francisco, many of our lower-ranking members and their families live at or near the poverty line and simply cannot afford the cost of many recreational activities available on the local economy. To help offset this economic impact, the military provides subsidized recreational opportunities to active-duty service members at a below "local market" cost. Unfortunately, as a result of base closures in the San Francisco area during past years, few of these recreational opportunities remain.

1-B

The elimination of the Travis AFB Marina would be a substantial loss that will have an adverse impact on the morale of those active-duty military members in the local area that use this recreational facility. The loss of the Travis AFB Marina will also have a negative fiscal impact on other recreational activities sponsored by the military. As a revenue generator, the profits resulting from Travis AFB Marina operations are used to offset and defray the costs of other recreational programs for active duty members that operate at a loss. The closure of the Travis AFB Marina would result in the loss of operating capital used to fund Air Force recreational programs.

The EIS should include an analysis of adverse impacts to military recreation opportunities and related impacts to morale for each alternative that could result in permanent closure of the Travis AFB Marina and PYC.

Travis AFB Comment 3: The DEIS and Proposed Plan do not identify potential impacts to the recruitment or retention of military members in the event of Travis AFB Marina closure.

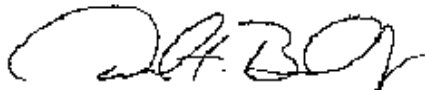
In an era of DOD cutbacks and fiscal constraints, the potential loss of the Travis Marina marks the loss of still another benefit available to military members and dependents. Although it is difficult to quantify the impact that closure of the Travis AFB Marina will have in and of itself, the loss of this recreation facility will add to the growing list of quality of life concerns. The nation's ability to both recruit and (more importantly) retain qualified personnel is currently in crisis. The exodus of talent is of sufficient concern that the senior levels of both the Administration and Congress are devising strategies to reverse this trend. The loss of this recreational facility will detract from the quality of life of active-duty military members and their dependents, and further hamper efforts to retain quality personnel.

1-C

The EIS should identify and discuss potential impacts to recruitment and retention for each alternative that could result in closure of the Travis AFB Marina and PYC.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Fort Baker. If you have any questions regarding these comments, please contact Mr. Mark Dupree at (707) 424-5341.

Sincerely



DAVID F. BIRD, Jr., Colonel, USAF
60 Support Group Commander

FORT BAKER

Final EIS

**Letter 1. David F. Byrd, Jr., Department of the Air Force, 60th Air Mobility Wing,
December 7, 1998.**

1-A, 1-B and 1-C:

Comments noted. The NPS recognizes the intangible value of the community of yacht club members. Sections 4.2.11.2 and 5.3.1 of the EIS address the loss of the club. The NPS also acknowledges the needs of the Air Force for recruitment, retention, and morale of active duty military personnel. These issues, however, are outside the scope of this EIS. Please also refer to Master Response #8 – Impacts to Current Users of Boat Shop and Marina and Master Response #7 – Preference for Retaining PYC/Travis AFB.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Fort Baker Plan**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. EPA provided scoping comments on the Fort Baker Plan in a letter dated September 26, 1997, and attended a GGNRA Advisory Committee meeting on September 9, 1998 which included a presentation on the proposed plan.

The Fort Baker Plan DEIS analyzes four alternatives, including no action, for the future use of Fort Baker's facilities and grounds. The DEIS does not specifically designate a "preferred alternative," but the first alternative, the Proposed Plan for Fort Baker, is denoted as the Park Service's "Proposed Action." The Proposed Plan alternative features the construction of a conference and retreat center, expansion of the Bay Area Discovery Museum, retention of the Coast Guard Station, changes to the existing marina to support public use, removal of a bulkhead to accommodate beach restoration, restoration of native habitat for the mission blue butterfly restoration and interpretation of historical structures, and plans to improve access and traffic circulation.

EPA supports the Proposed Plan alternative, and commends the Park Service for designing a plan which balances increased use of Fort Baker as a "self-supporting" park with plans to restore and preserve the park's historic and natural resources. The Park Service deserves special praise for clearly identifying mitigation measures designed to minimize environmental impacts, and for effective use of the Internet to disseminate project information and solicit public comments. We are pleased to rate this document LO (Lack of Objections).

We appreciate the opportunity to review this DEIS. If you have questions about this letter, please contact Leonidas Payne of my staff by phone [415-744-1571] or e-mail [payne.leonidas@epamail.epa.gov].

Sincerely,

David J. Farrell, Chief
Federal Activities Office

2-A

F O R T B A K E R

Final EIS

**Letter 2. David J. Farrell, Chief, Federal Activities Office, United States Environmental
Protection Agency Region IX, December 1998.**

2-A

Comments noted, thank you.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

October 19, 1998 F/SW04:1.XH

General Superintendent
GGNRA
Building 201, Fort Mason
San Francisco, CA 94123

Dear Superintendent:

Thank you for requesting comments on the Draft Environmental Impact Statement for the proposed re-use of Fort Baker, a unit of the National Park System. Fort Baker, the last military holding within the Golden Gate National Recreation Area, is located on the north shore of the mouth of San Francisco Bay, in Marin County, California. The National Park Service, in partnership with the Golden Gate National Parks Association, evaluated the environmental consequences of four alternatives for the management and re-use of Fort Baker. The preferred alternative includes the creation of a conference and retreat center in the historic buildings of the Fort; expansion of the Bay Area Discovery Museum; retention of the Coast Guard Station; conversion of the historic boat shop into a public meeting space; conversion of the existing marina to short-term public use; removal of the wooden waterfront bulkhead; beach restoration; improvements to the fishing pier; stabilization of historic military structures; creation of a National Park Service visitor center and interpretive trail along the waterfront; and restoration of native habitat.

Available information indicates that the following species may occur in the project area:

Sacramento River winter-run ESU chinook salmon
(*Oncorhynchus tshawytscha*) - endangered
Central Valley spring-run ESU chinook salmon
(*Oncorhynchus tshawytscha*) - proposed-as-endangered
Central Valley fall/late fall-run ESU chinook salmon
(*Oncorhynchus tshawytscha*) - proposed-as-threatened
Central Valley ESU steelhead
(*Oncorhynchus mykiss*) - threatened
Central California Coast ESU steelhead
(*Oncorhynchus mykiss*) - threatened
Central California ESU coho salmon
(*Oncorhynchus kisutch*) - threatened

The site is also located within the designated critical habitat for winter-run chinook salmon (58 FR 33212) and the proposed critical habitat for spring and fall/late fall-run chinook salmon (63 FR 11482) and coho salmon (62 FR 62741).

To minimize impacts to listed and proposed-for-listing species, as well as herring spawning habitat, NMFS recommends that the following mitigation measures be considered:

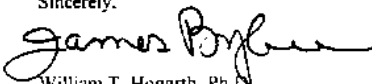
1. Bulkhead/riprap removal, beach restoration, marina conversion, and dredging (including future maintenance dredging) activities shall occur during the months of June through September.
2. Mitigation for impacts to eelgrass from bulkhead/riprap removal, beach restoration, marina conversion, and dredging (including future maintenance dredging) activities shall conform with the Northern California Eelgrass Mitigation Policy (attached). Impacts shall be determined through pre-project and post-project surveys performed in accordance with the Policy.

3-A

If the National Park Service modifies the Fort Baker conversion project with these recommendations and then determines that the action is not likely to adversely affect listed species or critical habitat, this letter will constitute a written concurrence that the proposed action is not likely to adversely affect listed species or critical habitat pursuant to 50 C.F.R. section 402.13(b).

If you have questions concerning these comments, please contact Ms. Laura Hamilton of my staff at (707) 575-6082.

Sincerely,

FOR 
William T. Hogarth, Ph.D.
Regional Administrator

attachment



NORTHERN CALIFORNIA EELGRASS MITIGATION POLICY

(Adopted July 31, 1991)

Eelgrass (*Zostera marina*) vegetated areas function as important habitat for a variety of fish and other wildlife. In order to standardize and maintain a consistent policy regarding mitigating adverse impacts to eelgrass resources, the following policy has been developed by the Federal and State resource agencies (National Marine Fisheries Service, U.S. Fish and Wildlife Service, and the California Department of Fish and Game).

For clarity, the following definitions apply. "Project" refers to work performed on-site to accomplish the applicant's purpose. "Mitigation" refers to work performed to compensate for any adverse impacts caused by the "project". "Resource agencies" refers to National Marine Fisheries Service, U.S. Fish and Wildlife Service, and the California Department of Fish and Game.

1. Mitigation Need. Eelgrass transplants shall be considered only after the normal provisions and policies regarding avoidance and minimization, as addressed in the Section 404 Mitigation Memorandum of Agreement between the Corps of Engineers and Environmental Protection Agency, have been pursued to the fullest extent possible prior to the development of any mitigation program.

2. Mitigation Map. The project sponsor shall map thoroughly the area, distribution, density and relationship to depth contours of any eelgrass beds likely to be impacted by project construction. This includes areas immediately adjacent to the project site which have the potential to be indirectly or inadvertently impacted as well as areas having the proper depth and substrate requirements for eelgrass but which currently lack vegetation.

Protocol for mapping shall consist of the following format:

1) Coordinates

Horizontal datum - Universal Transverse Mercator (UTM), NAD 83, Zone 11

Vertical datum - Mean Lower Low Water (MLLW), depth in feet.

2) Units

Transects and grids in meters.

Area measurements in square meters/hectares.

All mapping efforts must be completed during the active growth phase for the vegetation (typically March through October) and shall be valid for a period of 120 days with the exception of surveys completed in October.

A survey completed in October shall be valid until the resumption of active growth (i.e., March 1). After project construction, a post-project survey shall be completed within 30 days. The actual area of impact shall be determined from this survey.

3. Mitigation Site. The location of eelgrass transplant mitigation shall be in areas similar to those where the initial impact occurs. Factors such as, distance from project, depth, sediment type, distance from ocean connection, water quality, and currents are among those that should be considered in evaluating potential sites.

4. Mitigation Size. In the case of transplant mitigation activities that occur concurrent to the project that results in damage to the existing eelgrass resource, a ratio of 1.2 to 1 shall apply. That is, for each square meter adversely impacted, 1.2 square meters of new suitable habitat, vegetated with eelgrass, must be created. The rationale for this ratio is based on, 1) the time (i.e., generally three years) necessary for a mitigation site to reach full fishery utilization and 2) the need to offset any productivity losses during this recovery period within five years.

Transplant mitigation completed three years in advance of the impact (i.e., mitigation banks) will not incur the additional 20% requirement and, therefore, can be constructed on a one-for-one basis. However, all other monitoring requirements (outlined below) remain the same irrespective of when the transplant is completed. Project proponents should consider increasing the size of the required mitigation area by 20-30% to provide greater assurance that the success criteria, as specified in Section 9, will be met.

5. Mitigation Technique. Techniques for the construction and planting of the eelgrass mitigation site shall be consistent with the best available technology at the time of the project. Donor material shall be taken from area of direct impact whenever possible, but also should include a minimum of two additional distinct sites to better ensure genetic diversity of the donor plants. Written permission to harvest donor plants must be obtained from the California Department of Fish and Game. Plantings should consist of bare-root bundles consisting of 8-12 individual turions. Specific spacing of transplant units shall be at the discretion of the project sponsor. However, it is understood that whatever techniques are employed, they must comply with the stated requirements and criteria.

6. Mitigation Timing. For off-site mitigation, transplanting should be started prior to or concurrent to the initiation of in-water construction resulting in the impact to the eelgrass bed. Any off-site mitigation project which fails to initiate transplanting work within 135 days following the initiation of the in-water construction resulting in impact to the eelgrass bed will be subject to additional mitigation requirements as specified in section 7. For on-site mitigation, transplanting should be postponed when construction work is likely to impact the mitigation. However, transplanting of on-site mitigation should be started no later than 135 days after initiation of in-water construction activities. A construction schedule which includes specific starting and ending dates for all work including mitigation activities shall be provided to the resource agencies for approval at least 30 days prior to initiating in-water construction.

7. Mitigation Delay. If, according to the construction schedule or because of any delays, mitigation cannot be started within 135 days of initiating in-water construction, the eelgrass replacement ratio shall be increased above the 1.2:1 ratio specified in section 4 at a rate of seven percent for each month of delay. This increase in mitigation obligation is necessary to ensure that all productivity losses incurred during this period are sufficiently offset within five years.

8. Mitigation Monitoring. Monitoring the success of eelgrass mitigation shall be required for a period of five years for most projects. Monitoring activities shall determine the percent coverage and density of plants at the transplant site and shall be conducted at 3, 6, 12, 24, 36, 48, and 60 months after completion of the transplant. All monitoring work must be conducted during the active vegetative growth period and shall avoid the winter months of November through February. Sufficient flexibility in the scheduling of the 3 and 6 month surveys shall be allowed in order to ensure the work is completed during this active growth period. Additional monitoring beyond the 60 month period may be required in those instances where stability of the proposed transplant site is questionable.

The monitoring of an adjacent or other acceptable control area (subject to the approval of the resource agencies) to account for any natural changes or fluctuations in bed width or density must be included as an element of the overall program.

A monitoring schedule that indicates when each of required monitoring events will be completed shall be provided to the resource agencies prior to or concurrent with the initiation of the mitigation.

Monitoring reports shall be provided to the resource agencies within 30 days after the completion of each required monitoring period.

9. Mitigation Success. Criteria for determination of transplant success shall be based upon a comparison of vegetation coverage (area) and density (turions per square meter) between the project and mitigation sites. Extent of vegetated cover is defined as that area where eelgrass is present and where gaps in coverage are less than one meter between individual turions clusters. Density of shoots is defined by the number of turions per area present in representative samples within the control or transplant bed. Specific criteria are as follows:

- a. a minimum of 70 percent areal coverage and 30 percent density after the first year.
- b. a minimum of 85 percent areal coverage and 70 percent density after the second year.
- c. a sustained 100 percent areal coverage and at least 85 percent density for the third, fourth and fifth years.

Should the required eelgrass transplant fail to meet the established criteria, then a Supplementary Transplant Area (STA) shall be constructed, if necessary, and planted. The size of this STA shall be determined by the following formula:

$$STA = MTA \times (|A_i + D_i| - |A_c + D_c|)$$

MTA = mitigation transplant area.

A_i = transplant deficiency or excess in area of coverage criterion (%).

D_i = transplant deficiency in density criterion (%).

A_c = natural decline in area of control (%).

D_c = natural decline in density of control (%).

Three conditions apply:

- 1) For years 2-5, an excess of only up to 30% in area of coverage over the stated criterion with a density of at least 60% as compared to the control area may be used to offset any deficiencies in the density criterion.
- 2) Densities which exceed any of the stated criteria shall not be used to offset any deficiencies in area of coverage.
- 3) Any required STA must be initiated within 120 days following the monitoring event that identifies a deficiency in meeting the success criteria. Any delays beyond 120 days in the implementation of the STA shall be subject to the penalties as described in Section 7.

10. Mitigation Bank. Any mitigation transplant success that, after five years, exceeds the mitigation requirements, as defined in Section 9., may be considered as credit in a "mitigation bank". Establishment of any "mitigation bank" and use of any credits accrued from such a bank must be with the approval of the resource agencies and be consistent with the provisions stated in this policy. Monitoring of any approved mitigation bank shall be conducted on an annual basis until all credits are exhausted.

11. Exclusions. Placement of a single pipeline, cable, or other similar utility line across an existing eelgrass bed with an impact corridor of no more than 12 inches wide may be excluded from the provisions of this policy with concurrence of the resource agencies. After project construction, a post-project survey shall be completed within 30 days and the results shall be sent to the resource agencies. The actual area of impact shall be determined from this survey. An additional survey shall be completed after 12 months to insure that the project or impacts attributable to the project have not exceeded the allowed 12 inch corridor width. Should the post-project or 12 month survey demonstrate a loss of eelgrass greater than the 12 inch wide corridor, then mitigation pursuant to provisions 1-10 of this policy shall be required.

(last revised 9/30/97)

F O R T B A K E R

Final EIS

Letter 3. William T. Hogarth, Ph.D. Regional Administrator, United States Department of Commerce, National Oceanic and Atmospheric Administration, October 19, 1998.

3-A

Mitigation incorporated into the Proposed Action to address eelgrass protection and enhancement (refer to Section 2.6.4) have been revised in the FEIS per the recommendations of the National Marine Fisheries Service. Based on the analysis in the EIS, and the incorporation of the NMFS recommendations, the Proposed Action is not likely to adversely affect listed species or critical habitat.



Pete Wilson
GOVERNOR

Paul F. Miner
DIRECTOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research

1400 TENTH STREET SACRAMENTO, CALIFORNIA 95832-1044

November 6, 1998

BRIAN O'NEILL
NATIONAL PARK SERVICE - GONRA
BUILDING 201, FORT MASON
SAN FRANCISCO, CA 94123

Subject: FORT BAKER PLAN
SCH#: 98104016

Dear BRIAN O'NEILL:

The State Clearinghouse has submitted the above named proposed Draft EIS to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse had checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

These comments are forwarded for your use in preparing your final Draft EIS. Should you need more information or clarification, we recommend that you contact the commenting agency at your earliest convenience.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Antero A. Rivasplata
Chief, State Clearinghouse

Enclosures
cc: Resource Agency

4-A

F O R T B A K E R

Final EIS

Letter 4. **Antero A. Rivasplata, Chief, State Clearinghouse, Governor's Office of Planning and Research, November 6, 1998.**

4-A

Comment noted.

DEPARTMENT OF BOATING AND WATERWAYS

1429 S STREET
SACRAMENTO, CA 95814-7291
(916) 443-6281



December 8, 1998

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Building 201
Fort Mason
San Francisco, California 94123

Dear Superintendent O'Neill:

The California Department of Boating and Waterways (Department) has reviewed the Draft EIS for the reuse of Fort Baker, located in the Golden Gate National Recreation Area (GGNRA), and has the following comments:

The Department endorses the Office and Cultural Center alternative because it would retain the existing marina at Fort Baker. There are few opportunities today for the construction of new marinas having coastal access. The loss of such a facility is not in the best interest of California or the boating public. We are aware that the current marina is in need of repair. Therefore, we would like to suggest that if the GGNRA were willing to lease the marina facility to a local public agency, the Department could entertain a loan request from that public agency to fund the necessary rehabilitation and upgrades to make the marina a recreational centerpiece for the GGNRA.

5-A

The Department would be willing to discuss this proposal in further detail with you at your convenience.

Sincerely,

Frank Dowd, Supervisor
Local Assistance Planning
(916) 327-1096

F O R T B A K E R

Final EIS

Letter 5. Frank Dowd, Supervisor, Local Assistance Planning, Department of Boating and Waterways, December 8, 1998.

5-A

Comments noted, thank you. The NPS will consider this information during future planning and implementation efforts.

State of California

The Resources Agency

MEMORANDUM

To: Project Coordinator
Resources Agency

Date: November 6, 1998

Mr. Brian O'Neil, Superintendent
Golden Gate National Recreation Area
National Park Service
U.S. Department of the Interior
Building 201, Fort Mason
San Francisco, CA 94123



From: Department of Conservation
Office of Governmental and Environmental Relations

Subject: Geology and Seismology Comments -- Draft Environmental Impact
Statement, Fort Baker, Golden Gate National Recreation Area, Marin
County, SCH # 98104016.

The California Department of Conservation (Department) has reviewed the Draft Environmental Impact Statement prepared by the National Park Service (NPS) for Fort Baker. Geologists and seismologists within the Department's Division of Mines and Geology (DMG) have prepared the following comments. Our comments are focused on Section 3.1, Geology and Soils, and Section 4.2.1, Environmental Consequences of Proposed Action, Geology and Soils. The purpose of our comments is to strengthen the geologic hazards section of the report with respect to California seismic and geologic standards.

1. The terrain of the San Francisco Bay Area, and the Golden Gate in particular, is profoundly affected by the bedrock formations and surface deposits. Therefore, an accurate geologic map is an essential starting place for environmental planning decisions.

The geologic map, Figure 3-1, contains cartographic drafting errors for the bedrock formation immediately west of Horseshoe Bay. The steep slope between the Coast Guard Building and Vista Point is composed of greenstone bedrock of the Franciscan Formation. The correct symbol for this formation would be KJg (not Qlo, as indicated, which is for *older landslide deposits*). There should be a leader-line to the small Qlo deposit map polygon, which is located on the map near to the Qly polygon. Also, the geologic unit known as Quaternary bay mud is mislabeled as Qm and should be Qn.

We suggest that the published color geologic map (plate 1) within U.S. Geological Survey Professional Paper 782, Geology of the San Francisco North Quadrangle (1974), be consulted to ensure that the mapping designations shown on Figure 3-1 are correct. This 109-page formal publication is a more complete source to cite than USGS Map I-272 is. Also, we suggest that different, more readable, patterns be used for the geologic units in Figure 3-1; the dark shades of gray used are difficult to decipher and

6-A

therefore could lead to misinterpretation of the map. An expedient alternative would be to use a color copy of the USGS colored version of the geologic map. Finally, we recommend that all geologic maps be drawn to scale, including Figure 3-1, currently labeled, "not to scale."

6-A

For the sake of clear attribution of information, the spelling of Julius Schlocker's name on Figure 3.1 should be corrected.

6-B

2. The San Gregorio Fault Zone is not correctly shown on Figure 3-2. This active Type "A" fault is continuous north of Pacifica and materially affects the earthquake ground motion at the Golden Gate. Refer to the Fault Activity Map of California prepared in 1994 by Charles W. Jennings of the California Division of Mines and Geology. Please contact DMG if you need a copy of this publication.

6-C

3. We suggest that more information about earthquake ground motion be added to the information on pages 3-1 and, particularly, 4-12. There needs to be a clear disclosure under NEPA and CEQA that calculated earthquake ground motion potential is very high within those portions of the Fort Baker campus that are underlain by soft Quaternary sediments. We suggest that more specific seismology information be added to the sentence on page 4-12: "...and new construction would meet applicable seismic codes, laws, and NPS policies." The reader needs to know what the specific codes, laws and policies are and how they apply to this project.

6-D

More to the point, the DEIR should explicitly show how the new building will be "built to Code" for sufficient structural safety. This is important, as is demonstrated in the following paragraphs and attached charts, because the calculated ground motion exceeds the safety envelope of the 1997 Uniform Building Code for the soft Quaternary sediments underlying most of the Fort's buildings (Figure 16-3).

From the perspective of the Uniform Building Code, Table 16-J (site classification for seismology design), the geologic subgrade within Fort Baker is of two general geologic types. DMG used these geologic subgrade classifications to compute two separate earthquake ground-motion levels for the Fort Baker project.

UBC Type S_0 -- "stiff soil": composed of unlithified Quaternary sediments (Qu, Qsr, Qm, Qat), and subject to soft-sediment amplification during a significant earthquake; and,

6-E

UBC Type S_B : "rock": composed of Franciscan greenstone and chert.

With these two geologic types, the Fort Baker site presents a seismic situation analogous to the 1989 Loma Prieta Earthquake where the earthquake shook Yerba Buena Island moderately, while the adjacent Treasure Island was shaken severely. This condition of two different levels of calculated shaking needs to be disclosed in the Draft EIS. The information is needed for any newly planned construction (such as the conference center), and any seismic retrofit for existing historic buildings.

4. Attached please find a pair of response spectra prepared for two locations within Fort Baker. The area of the Discovery Museum was modeled using the stiff soil subgrade. This is typical for about 90 percent of the buildings within Fort Baker that are situated on low-lying terrain north and northwest of Horseshoe Bay. The bedrock quarry situated north of the Capehart Historic Area was modeled as "rock".

A complete probabilistic seismic hazard analysis was performed using the CDMG/USGS statewide model that is published in Petersen, *et al.* (1996) CDMG Open-File Report 98-08, also simultaneously numbered as USGS Open-File Report 98-706. (Note that this citation needs to be corrected on page 7-7.) We evaluated all the seismogenic faults in the Bay Area using the following two Building Code parameters in our probabilistic seismic hazard analysis:

The Upper-Bound Earthquake

Results of the model run for Peak Ground Acceleration were:

- PGA = 0.82g for stiff soils (e.g., Discovery Museum and Conference Center)
- PGA = 0.48g for rock (most of the bedrock ridge areas)

This ground motion has the following parameters, and is applicable to public schools and hospitals and essential services buildings:

- 10% chance of exceedance in 100 years
- Statistical return period = 949 years

Since public school children would be principal users of the Discovery museum and other planned educational facilities at Fort Baker, the NPS may wish to consider using this ground motion for seismic safety design. (Citation: 1998 California Building Code Section 1634A.2.6)

6-F

The Design Basis Earthquake

Results of the model run for Peak Ground Acceleration were:

- PGA = 0.64g for stiff soils (such as quay walls and dock areas)
- PGA = 0.37g for rock (most of the bedrock ridge vista areas and historic artillery areas)

This ground motion has the following parameters and is applicable to "regular" residential and commercial structures. (Citation: 1997 Uniform Building Code, Section 1627, 1629.1)

- 10% chance of exceedance in 50 years
- Statistical return period = 475 years

Mr. Brian O'Neil
November 6, 1998
Page 4

6. The important outcome of this modeling exercise for the project is that for stiff soil sites (encompassing most of the buildings at Fort Baker) the calculated ground motion far exceeds the envelope of Figure 16-3 of Uniform Building Code. This is a matter of concern for the building design of this project. The FEIR should explicitly state that building design at Fort Baker will rely on custom earthquake ground motion that has been carefully calculated using probabilistic seismic hazard analysis.
7. DMG suggests that NPS use the authoritative references for liquefaction analysis, strong ground motion, and landslide analysis that are contained in California Division of Mines and Geology Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 74 pages, 1997. This document has been adopted by the California State Mining and Geology Board and represents the state-of-the-practice in California. It particularly applies to areas that have been legally zoned by the State Geologist under the Seismic Hazards Mapping Act.

6-F

6-G

We hope that our comments about earthquake ground motion will contribute to the design of a safe project. If you have any questions about our comments, please feel free to contact Senior Engineering Geologist Robert H. Sydnor at 916-323-4399, or by e-mail at RSydnor@consrv.ca.gov.



Jason Marshall
Assistant Director

Attachments

cc: R.H. Sydnor
Division of Mines and Geology

F O R T B A K E R

Final EIS

**Letter 6. Jason Marshall, Assistant Director, California Department of Conservation,
Office of Governmental and Environmental Relations, November 6, 1998.**

6-A

Figure 3-1 in the FEIS has been modified to respond to the changes recommended by the commentor, including corrections on the identification of geologic formations.

6-B

Figure 3-1 of the FEIS has been changed to reflect the corrected source name (Julius Schlocker).

6-C

The San Gregorio Fault Zone has been corrected on Figure 3-2 of the FEIS to reflect the extension of the zone north of Pacifica.

6-D

As recommended by the commentor, more specific seismology information has been added to Sections 2.6.1, 3.1, and 4.2.1.3 of the FEIS regarding the high potential for ground motion at the site, in particular regarding how future work at the site will meet or exceed specific seismic codes, laws and policies as they relate to this project.

6-E

In response to the comment, text changes in Section 4.2.1.3 have been made in the FEIS to characterize ground shaking potential at Fort Baker, and to distinguish the different geologic subgrades (and subsequent hazards) occurring on-site. In addition, Chapter 7 (References) has been corrected as noted by the commentor.

6-F

Comment noted. The FEIS has been revised to reflect the analysis and subsequent recommendations made by CDMG. Please refer to Sections 2.6.1, 3.1, and 4.2.1.3 of the FEIS for additional information.

6-G

Comment noted. The FEIS has been revised (see Sections 2.6.1, 3.1, and 4.2.1.3).

6-H

Comment noted. Please refer to FEIS Section 2.6.1.

CITY OF SAUSALITO

COMMUNITY DEVELOPMENT DEPARTMENT
420 LITHO STREET - SAUSALITO
CALIFORNIA 94965 - TEL: (415) 289-4100
FAX: (415) 338-2258

December 7, 1998

Superintendent Brian O'Neill
Golden Gate National Recreation Area (GGNRA)
Building 201, Fort Mason
San Francisco, CA 94123

RE: Comments on Draft Environmental Impact Statement for Fort Baker Plan, October 1998

Dear Superintendent O'Neill,

The City of Sausalito supports the transfer of Fort Baker from the Army to the National Park Service by 2001. Although this area has remained a somewhat "hidden jewel" near our own shores, the City recognizes the need to improve the public amenities and address the deteriorating infrastructure. Having now reviewed the project proposal and discussed the matter with staff, other Council Members, and our involved citizenry, I can sincerely conclude that the proposed Conference & Retreat Center concept is an appropriate solution for re-use of the site.

However, the City is concerned about the intensity of the proposed project, its effect on the fragile environment of the Fort Baker site, and the impact on the limited infrastructure of the surrounding lands and the City of Sausalito. The City is the nearest urban center and shares a special, yet somewhat tenuous, relationship with the Site. Although the City of Sausalito is nearly built-out, the 1995 General Plan recognizes the potential to add approximately 430 dwelling units and 400,000 square feet of commercial square footage. The development potential of the City was set by current zoning limitations in 1963 and has not been increased since that time. The development potential of the majority of commercial lands were cut in half by a voter initiative in 1985 (termed the Traffic Initiative) and this reduction is reflected in the 1995 General Plan. In this way, the City of Sausalito has recognized the limited infrastructure in which it exists and is attempting to minimize growth to maintain a high quality of life. Despite these efforts, the City streets, parking lots, and public amenities are under increasing pressure from regional, national, and international visitors traveling to and through our City. As both a destination and as a thru-way of the Bay Trail, the City currently experiences a staggering amount of vehicle, bicycle, and pedestrian traffic on the Bridgeway corridor, particularly on weekend days. On weekend days, our three downtown parking lots regularly exceed capacity by noon and our main downtown intersection experiences level D service. The General Plan anticipates level F service at that intersection with full build-out.

For these reasons, the City must express concern with the potential intensification of use as it will affect the City's traffic, parking, and general services. Although the proposed project may result in less traffic demand than that the two development alternatives, the conclusions of the study on this matter seem somewhat skewed. The comparison to the 1980 GMP treats Fort Baker as an isolated site and does not seem to recognize the reduction of traffic to other areas of the Park, through Danes Drives, due to the closure of Rodeo Valley road and the relocation of other uses from the Rodeo Valley area, as envisioned under the GMP. In essence, some of the projected demand is part of the existing demand, merely being re-routed. Additionally, the EIS does recognize that the proposed

use will invite the types of visitors that will add to Sausalito's tourist traffic, which is particularly heavy on weekend days. We have the following comments regarding the project proposal and its accompanying Environmental Impact Statement:

1. The project proposal and EIS do not clearly define the parameters of the Conference and Retreat Center use. The City is concerned about the potential for the Concessionaire to expand the general hotel and lodging use. It is understandable that in-fill lodging is typical of conference and retreat centers. However, what priority is given to lodging conference and retreat groups? What priority is given to non-profit, cultural, and/or environmental organizations over professional and corporate groups? How will these priorities be enforced upon the concessionaire? As a general hotel use, the potential for implementing the Traffic Demand Management (TDM) Plan becomes more difficult. Further such uses would compete with Sausalito's existing hotel uses rather than support them, as stated in Section 4.2.9.5 of the EIS (Potential Effects on Surrounding Hotels). We request that the EIS better define the parameters of the Conference & Retreat Center use and how it is to be enforced as a mitigation of potential negative impacts. We also request that the City be permitted to review and comment on the draft RFP for selection of a concessionaire for these and other reasons discussed below. We wish to review the Draft RFP before it is finalized and sent out for bid. Further, if the Conference & Retreat Center is not successful, does the NPS have a fall-back plan that does not entail more intensive uses of the improved buildings?
2. Page 3-1 of the Transportation Study by Wilbur Smith Associates indicates that the proposed traffic volumes will remain "well below the capacity of a two-lane arterial." However, the study does not define the capacity of this two-lane arterial. In our experience, the evening southbound traffic regularly gets backed up well past Danes Drive and sometimes to the City limits, particularly on Sunday evenings. The study makes no recognition of the impact and back-up caused to reverse commute flows due to the reduction in reverse commute lanes on the Golden Gate Bridge (switching cones). Further, the Transportation Study determined the existing traffic conditions based on road counts taken on only 7 weekdays and 3 weekend days in January of 1998. Due to Winter weather factors, it is questionable whether this limited count provides an accurate determination of existing traffic conditions. Due to the high level of recreational activities that occur in Southern Marin during warm weather days (particularly weekend days), a higher level of traffic will almost certainly may occur. If these counts are low, then the traffic projections could approach or exceed the capacity of Alexander Avenue and result in greater queuing at left hand turns and/or poorer levels of service at intersections. We are particularly concerned about the performance of the turn-off from Alexander Avenue to Danes Drive, which will serve as the primary entrance to Fort Baker. The Traffic Study indicates that this intersection would be reduced to level C service during weekend days, with minor back-up of left hand queuing. Given the significance of this project, the City requests that a more thorough traffic analysis of existing conditions be conducted with additional measurements taken at two periods in Spring and Summer be provided. Mitigation measures, such as an extension of the left turn lane or an efficient signaling system at the Danes Drive intersection, should be studied and implemented if higher traffic volumes result in a service level D or worse during peak times. As traffic to both Cronkite and Fort Baker share the same left turn lane, the study should also provide a cumulative analysis for changes of uses and future traffic levels expected at Cronkite.

7-A

7-B

3. The EIS essentially ignores the impact of additional traffic loads into Sausalito, particularly on weekend days, focusing largely on the peak commute hours on Alexander Avenue. The Transportation Study finds that the project will result in an approximately 40% increase of vehicle trips on Alexander Avenue during peak weekday and weekend day hours and attributes approximately 19 and 33 additional vehicle trips in the weekday and weekend day peak hours on Sausalito streets. The EIS finds this amount to be "minor" and "within the capacity of the streets". As a weekend day peak hour is considered to be from 5:00 to 6:00 p.m., the study does not identify the potential increase during the early weekend day hours (12:00-3:00 p.m.) when Sausalito experiences its lowest service levels at downtown intersections. The City requests that the traffic study be expanded to identify the potential increase in traffic in the downtown area during weekend day periods. We have a fairly recent downtown parking and traffic model that may be helpful in conducting such a review. We also request that the Study be adjusted to reflect the cumulative impacts of the project and other development projects over a five year period. If you are willing to conduct such an analysis, our staff can provide you with figures relating to several waterfront projects that are anticipated to occur in the immediate future.
4. The influx of guests/visitors into the Fort Baker area, will likely result in a notable increase of both pedestrian and bicycle riders crossing into Sausalito via East Road and Alexander Avenue. This type of visitor will be more apt to travel to Sausalito for recreational purposes than people working in offices or attending daytime conferences. The stretch of Alexander Avenue just before the Southern City limits provides no defined pedestrian / bicycle zone. This stretch of road at the entrance of the City has been identified by the City's Bicycle Safety Task Force as a hazardous situation. The City requests a thorough count of bicycle and pedestrian traffic at the City entrance at Alexander Avenue be provided, with projections of additional bicycle and pedestrian traffic volumes for that location. Improvements to Alexander Avenue at the Sausalito entrance, utilizing class II bike paths and a single pedestrian way along the edge of street, must be considered as a mitigation for highly hazardous traffic conditions at that location.
5. The EIS indicates that the Construction Activity should take place for approximately 12 months, requiring approximately 400 on-site workers and an estimated 150 to 200 truckloads of deliveries during "periods of construction". Further, approximately 3000 truckloads of material would be hauled off-site. The EIS indicates that the proposed action could affect morning commute periods, since deliveries and site workers will often arrive during commute times. The City agrees that the construction phase could, and almost certainly would, significantly impact traffic flow on Alexander Avenue. We are concerned that the report does not explain how the assumptions as to the number of workers, deliveries, off-site hauling, and construction time have been determined. A model Traffic Management Plan, scheduling the number of workers and deliveries through the course of the project, should be provided as guide to determine the impacts of the project on peak commute times and assessing mitigation measures.
6. Staff notes that the EIS findings are based upon a maximum of 350 units for a conference / retreat center and assumes 90% of guests will arrive by automobile. In essence, the analysis is based on a "worst case" scenario. To decrease this worst case scenario, the plan encourages project partners and programs to participate in a Traffic Demand Management (TDM)

7-C

7-D

7-E

7-F

program to decrease automobile usage by guests (page 2-28). The NPS has indicated that such a program has been implemented fairly successfully in other similar conference center uses around the country. Given the limited infrastructure of both Sausalito and the Fort Baker area, it is in the interest of the City of Sausalito that the TDM program be rigorously enforced. However, the current wording of the EIS basically identifies the TDM as a "desirable" program, employing words like "could" and "should". It is understandable that some of these programs, like the ferry service, be optional. Some of these proposals involve cooperation with other outside agencies as well. However, most of these concepts appear to be reasonable, beneficial, and workable. The City requests that the following elements of the TDM be specified as mandatory:

7-F

- a. Improvements to East Road parking with shuttle service provided for special events.
- b. Promotion of alternative travel modes and ridesharing programs.
- c. Directional signage along Alexander Avenue and East Road.
- d. Shuttle service to airport connections, local attractions, and the Sausalito Ferry Dock.
- e. Informational packets to employees and visitors to identify congestion times and alternative transportation sources.
- f. Promoting bussing, alternative scheduling, and large event planning for BADM.

The City requests an opportunity to review the draft RFP on this matter.

7. The traffic increases discussed in the EIS are significant to the community of Sausalito. As we are attempting to manage our existing growth to minimize the burden upon infrastructure, we hope that the Park Service will, in turn, attempt to minimize the intensity of this use as much as possible. After all, it is the mission of the NPS to convert this area to a public parkland, which everyone can enjoy. We fear that the extensive number of units will result in crowd levels that detract from general public enjoyment of the Fort Baker area. For both our traffic and safety concerns, and the benefit of the park itself, we request that the maximum number of 350 lodging units be reduced. We believe that 350 units is far more than is necessary to serve such a use. With no one group able to fill the facilities, it is less likely to provide "overflow" visitors to Sausalito's hotels, and will likely compete with our hotel uses. We would emphatically request that a smaller facility of 150-200 units be given priority by some means of incentive package in the RFP. We recommend that only re-use of existing structures occur, with as little new construction as possible. We request that an economic analysis of the project proposal be provided, including alternatives which may scale back the scope of park improvements and/or habitat restoration (costs) to reduce intensive level of redevelopment and use (funding source) as discussed above.

7-G

8. The closure of Conzelman Road to vehicular traffic will result in a loss of a minor, but scenic, access route for local citizens. It is understandable that the NPS seeks to close this road to minimize the use of Fort Baker as a thoroughfare. However, in its current state the road does not experience much through traffic. This road may continue to serve as an exit from Fort Baker, thereby decreasing the demand on Alexander Avenue. We request that the road be improved to possibly provide one-way traffic, with bicycle lanes, out of the site. The road could be closed at a later date, if necessary.

7-H

9. The City is concerned with regard to the additional demand on emergency services and lack of attention to the issue of disaster preparedness. The entire subject of mutual aid response agreements should be re-evaluated to recognize the potential increase for demand of City services. 7-I
10. In providing overnight lodging, the proposed use may add significantly more demand to the local wastewater collection and treatment system than the development alternatives. The City is aware that the Sausalito-Marin City Sanitary District is near capacity. In recent years, residents at the Southern portion of the City have complained of odors emanating from that facility. The City of Sausalito is now rigorously enforcing local sewer connection and water quality ordinances, requiring rehabilitation of deteriorated sewer lines in conjunction with most building permits or where public health is threatened. We believe that these and other upgrades to the system have lowered storm water infiltration. However, the EIS does not indicate whether the Sanitary District has been consulted on this matter. We request that the SMCSD verify if the capacity of existing wastewater collection and treatment facility can meet the proposed demand, as well as anticipated future demands, upon the system. 7-J
11. We recognize that the Park Service has attempted to provide adequate notice and public forums for input for interested groups and citizens. However, we are concerned that local citizen awareness is only beginning to recognize the reality of this project. As the adjacent neighbor to the Fort Baker, we request that additional consideration be provided to allow our City to fully participate in the review process. We request that a final decision on this project not occur until the City Council can hold a noticed public forum to discuss this matter and receive comments from our citizens. We will attempt to hold such a meeting in early or mid-January if you are willing to delay the final decision until that time. 7-K

Please thank your staff, particularly Nancy Horner and John Skibbe, for their diligent assistance in this matter. If you have any questions, please contact me at 332-1126 or Charlotte Flynn, Community Development Director, at 289-4131 for assistance.

Sincerely,



Amy Belser
Mayor, City of Sausalito

cc: Brock Arner, City Manager
Charlotte Flynn, Community Development Director

FORT BAKER

Final EIS

Letter 7. Amy Belser, Mayor, City of Sausalito, December 7, 1998.

Comments noted. The NPS appreciates the City of Sausalito's stated support for the transfer of Fort Baker to the park, and affirmation that the proposed Conference & Retreat Center is an "...appropriate solution for re-use of the site." The NPS also acknowledges the City's concerns related to the intensity of the proposed re-use, and has considered these issues in preparing the Final EIS. As indicated below, many of the concerns expressed by the City have resulted in changes to the EIS and mitigation contained therein. The NPS recognizes that the City and its citizens are very concerned about the potential impacts from Fort Baker and from other proposed projects in downtown upon the quality of life in Sausalito. In that regard, it is the NPS's intent to continue to work with the City and its citizens to resolve concerns related to the re-use of Fort Baker and build a positive working relationship that will be sustained in the years ahead.

7-A

Section 2.2 of the EIS outlines the parameters for the Proposed Action including the Conference and Retreat Center. As described in Section 2.2.1, many of the programs offered at the center would be focused on themes related to the park and the NPS mission including those cited by the City (i.e., environmental and cultural). Also as discussed in Section 2.2.1, many of the programs at the center would be offered at below-market rates to encourage participation from non-profits, public agencies and academic organizations. The project's objectives are clearly articulated in Section 1.3 of the EIS. As the future manager of the land, the NPS would have direct oversight and responsibility to ensure that the Proposed Action is implemented in a way that fulfills the stated objectives of the project.

The environmental impacts associated with operation of the Proposed Action, including the proposed center, are fully analyzed and disclosed in Chapter 4. Mitigation measures proposed to reduce or avoid the Proposed Action's anticipated effects are presented in Section 2.6. Based on input received from the City and other commentors, additional measures have been incorporated into Section 2.6 of this Final EIS. As the Lead Agency for the project, the NPS will be responsible to ensure the implementation of all mitigation measures.

The City of Sausalito and other interested agencies and members of the public may submit to the NPS written recommendations related to the forthcoming Request for Proposals (RFP) solicitation.

With regard to the City's last question related to options for the project should the proposed center not be successful, the following response is provided. The NPS will make its decision to adopt, conditionally adopt or reject the Proposed Action or other EIS alternatives at the time the Record of Decision is signed. Any discussion related to what direction the NPS would take in this process or following that process is pre-decisional and unknown at this time.

7-B

The ideal capacity of a 2-lane roadway with uninterrupted flow (no stop signs, yield signs, traffic signals) is 2,800 vehicles per hour (vph) total for both directions. For the free-flowing (uninterrupted) segment of Alexander Avenue east of the Highway 101 interchange, narrow roadway width, substandard shoulders, and steep grades reduce roadway capacity by approximately 25%, to 2,100 vph. Based on the City's request for additional information related to the roadway capacity a discussion of roadway LOS has been incorporated into the traffic impact discussion (see Section 4.2.6 of the Final EIS). Section 2.6.6 (traffic mitigation) has also been revised to further clarify the measures that would be implemented by the NPS and future Fort Baker park partners to minimize

FORT BAKER

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traffic impacts, including extension of the left turn lane at the Alexander Avenue/Danes Drive intersection.

With regard to the City's comments related to the timing of traffic counts and consideration of the effect of peak season on traffic volumes, the following background information on the methodology used for preparation of the *Fort Baker EIS Transportation Report* and subsequent analyses is provided. The Final EIS has been revised to explain the methodology used.

When conducting the transportation analysis it was necessary to estimate summer traffic conditions in the study area based on winter traffic turning movement counts collected in 1998. Seasonal variation factors were developed based on the ratio of total December 1997 traffic volume on East Fort Baker Bunker Road to the average of total June, July, and August 1997 traffic volume on East Fort Baker Bunker Road. The resulting seasonal adjustment factor obtained was 120%; that is, a factor of 1.2. This factor was compared to available supplementary data provided by the Golden Gate Bridge Highway and Transportation District (for toll booth volumes) and the California Department of Transportation (for U.S. 101 in vicinity of Alexander Avenue). The comparison demonstrated that 1.2 was a reasonable factor to use. The 1.2 factor was applied to the actual intersection turning movement counts for all approaches at all intersections. The seasonally adjusted turning movement traffic volumes were then used to perform all of the intersection LOS calculations and the queuing analysis for the project.

With regard to the question related to the Marin Headlands, no changes in land use are planned that would substantially alter traffic generation. The NPS is in the process of initiating a transportation planning effort for the Marin Headlands/Fort Baker area. The purpose of the effort will be to develop a long-term, comprehensive management approach to transportation and circulation within this area aimed at reducing individual vehicle trips and improving circulation. Participation by the City and citizens of Sausalito is strongly encouraged.

7-C

In response to this comment and subsequent meetings with the City and its traffic consultant, the NPS conducted additional analysis of the downtown effects. Section 4.2.6 of the Final EIS has been revised to include a discussion of the project's potential traffic effects on downtown during the 12 noon-3 pm weekend period, as well as cumulative impacts, as requested based on information provided by the City. Please refer to Section 4.2.6 and 2.6.6 of this Final EIS for additional information.

7-D

Section 4.2.6.5 of the EIS describes the safety improvements for bicyclists and pedestrians associated with the Proposed Action. The NPS agrees that improvements to increase existing bicycle and pedestrian safety off-site are beneficial. The NPS has already engaged the support of the City of Sausalito and Golden Gate Bridge Highway and Transportation District (GGBHTD) to seek funding for a planning study for bicycle/pedestrian improvements along Alexander Avenue from the Golden Gate Bridge interchange to the City of Sausalito. Since the review period for the Draft EIS closed, the NPS has worked with the Metropolitan Transportation Commission to institutionalize a corridor management team of principal stakeholders including the GGBHTD, City of Sausalito, Caltrans, and Marin County. This management team was organized under the Parklands Transportation Task Force to address transportation issues in the Alexander corridor including bicycle and pedestrian circulation. The NPS would like to participate in future planning efforts by the City that deal with these issues.

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The future Marin Headlands/Fort Baker transportation planning efforts previously mentioned as well as the Marin County bicycle planning effort currently underway would also be appropriate forums to address these issues. As described in Section 2.6.6, the NPS would develop a shuttle system between Fort Baker and Sausalito that can accommodate bicyclists.

7-E

The impact analysis for construction activities was based on the total volume of truck trips (to and from the site) and daily worker trips. These trips were estimated based on the anticipated construction requirements of the Proposed Action as described in Section 2.2, including the maximum 350-room facility Conference and Retreat Center (and associated historic building rehabilitation and new construction), demolition of some Capehart units, expansion of the BADM, and the restoration of the waterfront and beach. These assumptions are further described in Section 4.2.6.1 of the EIS.

The NPS concurs with the City's recommendation regarding use of a Transportation Management Plan (TMP) for construction operations. As discussed in Section 2.6.6 of the EIS, the NPS would require the selected construction contractor to prepare a TMP. The TMP would be reviewed and approved by the NPS prior to initiating construction activities, and would include detailed information related to construction traffic scheduling, routes, parking, staging areas, etc. such that the requirements of the EIS are met. The construction contractor would be required to ensure that all conditions of the TMP are implemented, with oversight and enforcement by the NPS. In response to the City's stated concerns, Section 2.6.6 has been revised to be more stringent and detailed. A copy of the Draft TMP can be made available to the City for review and comment in the future, if so desired.

7-F

Comments noted. At the request of the City, the text in Section 2.6.6 of the Final EIS has been expanded and revised to specify the requirements of the TDM program, as well as other mitigation measures. The City's request to review the "draft RFP on this matter" is noted; however, the documents describing the TDM and other mitigation measures will be the Final EIS and Record of Decision (ROD). The ROD will dictate what mitigation the NPS will implement and/or enforce, as required under the National Environmental Policy Act (NEPA).

7-G

Comments noted. The NPS recognizes the City of Sausalito's stated concerns related to the 350-room EIS scenario for the proposed conference and retreat center. In response to the request to reduce the size of the retreat and conference center and give "priority by some means of incentive package in the RFP" to such a facility, the NPS has developed and agreed to include selection criteria in the Request for Proposals (RFP) solicitation which addresses this issue. The criteria will give potential operators/developers proposing the smallest possible economically feasible project that meets the objectives of the Plan a stated advantage in the competition. Refer to Section 2.6.6 (under "Size of Conference Center") for the specific language to be used.

The focus of the Proposed Action is on reuse of existing historic buildings. As discussed in the Plan and EIS, some new construction is proposed to provide needed meeting space and dining facilities that cannot be provided in existing historic structures. This construction would be accommodated in areas where buildings were previously located or were planned but not built. Other construction for the retreat and conference center would be associated with the non-historic Capehart buildings

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(rehabilitation and/or construction). The Proposed Action was designed to fit within the existing built areas with no expansion into undeveloped areas.

Detailed economic proposals for the proposed retreat and conference center will be requested of all potential operators/developers during the RFP solicitation. Please note that the conference and retreat center will not be expected to fund other site improvements or habitat restoration beyond that which has a link to their operation or impacts. Other site improvements would be undertaken through a variety of sources that, in addition to federal funding, may include a private capital campaign and philanthropic support through the Golden Gate National Parks Association.

7-H

The NPS concurs with the City's recommendation regarding use of Conzelman Road as a one-way exit. Please refer to Master Response #1 - Conzelman Road Closure.

7-I

The NPS, having legal jurisdiction over the Fort Baker property, will provide emergency services to the area including fire, ambulance and police services. The NPS is currently working with appropriate agencies to ensure that calls for emergency response within the Fort Baker, Fort Barry and Fort Cronkhite are routed directly to the NPS dispatch center so that the NPS can provide first response. This communication protocol is expected to be operational long before potential implementation of the proposed Fort Baker Plan. Supplemental assistance from other jurisdictions (including the City of Sausalito), if deemed necessary by the NPS, will be reimbursed pursuant to existing arrangements and agreements. Based on further discussions between City and NPS emergency response officials, the City has agreed to monitor future demand for assistance in the Fort Baker area. If the City determines that there is a need to revisit existing agreements/arrangements based on the results of future monitoring, the City will contact the NPS so that a solution is developed and implemented.

7-J

The NPS has consulted with the Sausalito-Marin City Sanitary District (SMCSD) throughout the planning process. Such consultation has included discussions about treatment plant capacity, condition of the Fort Baker sanitary sewer system, and the potential for use of reclaimed water for uses such as irrigation at Fort Baker. Per the City's request, the S-MCSD was contacted again, and the District has confirmed that the projected demand associated with the Proposed Action would be well within the capacity of the treatment plant and that there would not be a conflict with known future plans for service provision. The S-MCSD indicated that there is excess capacity (average dry weather flow) of approximately 300,000 gallons per day (gpd), and that the projected demand for the Proposed Action would be easily accommodated (pers. comm., Douglas Humphrey, General Manager, SMCSD, 2/99 and 3/99). Section 2.6.10 of the Final EIS has been revised to include mitigation that will require NPS to address existing stormwater infiltration/inflow problems at Fort Baker and the Marin Headlands prior to occupation of the proposed retreat/conference center. Please also see response to comment 10-C.

7-K

Thank you for recognizing NPS efforts to provide for and encourage public involvement in the planning and environmental review processes. The City requested that the "final decision" on the project be delayed until the City Council have an opportunity to hold a public forum on the matter. On Saturday January 23, 1999, the City Council held such a forum. The forum was noticed by a

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postcard mailing to all residents of Sausalito, and was attended by approximately 75 people. NPS representatives presented the proposed plan and answered questions from the participants. On April 6, 1999, the City Council provided additional opportunity for City residents to discuss the project. Members of the NPS planning team also attended the April 6 meeting to provide an update on the project and answer questions. The NPS met several times with representatives of the City Council and staff to further discuss City concerns. Since release of the Draft EIS, the City has also created a citizen's task force to monitor future activities at Fort Baker and increase citizen participation.



GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

MERVIN C. GIACOMINI, P.E.
DISTRICT ENGINEER

December 4, 1998

Mr. Len McKenzie, Deputy Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123

RE: Comments on Fort Baker Plan and Draft EIS

Dear Mr. McKenzie:

The District commends the National Park Service for a well-prepared plan and draft environmental impact statement. Our comments pertain to the portion of the plan that impact the ability of the District to maintain and operate the Bridge in areas permitted to the District by the Department of War.

These portions of the plan are represented on Figure 2-2A, "Proposed Plan for Fort Baker" and consist of 4J Parking Area and 4K Interpretive Trail both of which are in the District's permitted area. Parking Area 4J impacts a maintenance and storage area essential to the future maintenance and operation of the Bridge. Interpretive Trail 4K impacts access essential to the maintenance of the North Tower of the Golden Gate Bridge. In addition, continued access is required from Conzelman Road on the west side of the Bridge to provide for the maintenance and operation of the Bridge.

8-A

Sincerely,

Mervin C. Giacomini, P.E.
District Engineer

MCG/gm

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Letter 8. Mervin G. Giacomini, District Engineer, Golden Gate Bridge District, December 4, 1998.

8-A

Comment noted. Golden Gate Bridge maintenance and operational needs are accommodated in the proposed Plan. Conzelman Road would remain open to service and emergency vehicles. The Bay Trail to Lime Rock could also accommodate service and emergency vehicles. The parking lot shown in the proposed plan is an existing public parking lot on NPS land within the Golden Gate Bridge permitted area that is currently being used for staging and related construction activities associated with the lead cleanup and seismic retrofit construction and would reopen to the public upon completion of this work. The NPS would work with the Golden Gate Bridge, Highway and Transportation District in the event that major work on the bridge requires construction staging or related use of park lands including the parking lot.



**MARIN MUNICIPAL
WATER DISTRICT**

220 Nellen Avenue
Corte Madera, CA 94925-1169
415.924.4600
FAX 415.927.4953

October 12, 1998

General Superintendent
GGNRA
Building 201, Fort Mason
San Francisco, CA 94123

Subject: Fort Baker Plan Draft EIS

Dear Sir:

Our staff has reviewed the domestic water supply section of the above referenced EIS. We find that the information therein is generally accurate and presents a reasonable full disclosure picture of the water system. However, one item needs more clarification. The third sentence of Section 3.12.1 (pg. 3-37) states, "The system is supplied with water from the Marin Municipal Water District via a metered (4-inch meter) 8-inch diameter water main with a reported supply capacity of 500 gallons per minute (gpm) or 720,000 gallons per day (gpd)". While the stated capacity for the meter is correct the actual water entitlement that is granted Fort Baker is 215.54 acre feet per year. If this amount were allocated on a daily basis it would equal 192,420 gpd.

9-A

Thank you for the opportunity to review the DEIS, and if you have any further questions don't hesitate to contact me at 924-4600 ext. 291.

Sincerely,

Eric McGuire
Environmental Services Coordinator

F O R T B A K E R

Final EIS

Letter 9. Eric McGuire, Environmental Services Coordinator, Marin Municipal Water District, October 12, 1998.

9-A

Comment noted, thank you.

Sausalito-Marin City Sanitary District

#1 Fort Baker Road • P.O. Box 39 • Sausalito, California 94965

Telephone: Office (415) 332-0244
Plant (415) 332-0240
Fax (415) 332-0453

December 1, 1998

General Superintendent
National Park Service
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

**SUBJECT: COMMENTS ON PROPOSED PLAN FOR FORT BAKER AND DRAFT
EIS (OCTOBER 1998)**

Thank you for the opportunity to review and comment on the proposed plan and associated environmental impact statement (EIS) for Fort Baker. The District is very interested in this important project and its associated impacts on the District and community. District comments are limited to aspects of the plan and EIS that may affect the District.

PROPOSED PLAN

Sewer Collection System

The District is pleased that the plan includes provisions to make significant improvements/replacement to its wastewater system and infrastructure. The inflow/infiltration (I/I) problem in GGNRA is severe and adversely impacts the operation of our wastewater treatment facility. The District supports the plan to improve the collection system in East Fort Baker and further suggests additional, similar efforts at the other Forts in GGNRA so wastewater flows are minimized.

Although the sewer work which will be performed is not within the District's boundaries and jurisdiction, the District would be happy to provide its standard specifications and drawings for sewerage facilities to project designers as a guideline for design.

Connection Fees

Although this subject is not specifically addressed in the plan, the District charges a connection fee for provision of service to new dwellings, businesses, facilities, etc. The new conference and retreat center will constitute a new service and the District should be provided a set of plans (including plumbing connections) once they are completed and available. This applies to all new or rehabilitated structures which will have connections to the sewer system.

10-A

The amount of the fee will be calculated once plan review is accomplished. Connection fees are \$2,750 per equivalent dwelling unit, and this figure should be used to estimate financing costs.

10-A

EIS

Wastewater Collection and Treatment

There is a statement that excessively high wet weather flows are as much as five times normal dry weather flows, and they cause the system to exceed its contractual maximum discharge to the SMCD treatment plant. In fact, District and GGNRA records indicate recent instances of more than ten times normal dry weather flows. The planned replacement of sewers noted in this section is essential. This item is critical to the District because its treatment facility is not designed to fully treat more than three times its normal, dry weather flow. The result is inability to treat all sewage completely, violation of NPDES discharge permit standards, adverse impact on the receiving water (San Francisco Bay), and potential for substantial fines and/or lawsuits. Therefore, the importance of sewer system replacement/rehabilitation at both East Fort Baker and, beyond the scope of the current subject plan, the remainder of GGNRA-managed area can not be emphasized enough.

10-B

Additional Wastewater Flow

There is no mention or estimate of how much additional wastewater flow will be generated by the plan. The conference and retreat center will certainly be a wastewater producer, and there should be some analysis or estimate to quantify the amount. Unless there is something not readily apparent, the amount should not pose a problem in relation to normal dry weather capacity or ability to treat, but we believe it is incumbent upon the EIS authors to provide this figure. The above comments regarding flows in the Wastewater Collection and Treatment section should make it obvious why flow is a concern and should be addressed.

10-C

Infrastructure (2.6.10)

There is a mention that the NPS would explore the possibility of using reclaimed water from our District for nonpotable water uses such as irrigation of the parade grounds. The District would like to work with the NPS to explore possibilities for the use of reclaimed water. Water reuse provides a great benefit to the community, avoids using water for nonpotable uses when it may better serve as potable uses, and also provides benefits to the District.

10-D

The District encourages an investigation of possibilities for water reuse at Fort Baker (and other areas of GGNRA as well).

General Superintendent
National Park Service
Golden Gate National Recreation Area
December 1, 1998

Sausalito-Marín City Sanitary District
Page 3

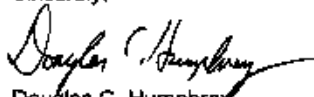
List of Recipients (6.6)

A minor point, but SMCSO is not listed as a recipient. Central Marin Sanitation Agency is listed and their jurisdiction is nowhere near Fort Baker.

10-E

Please contact me at (415) 332-0244 if there are any questions regarding the above comments.

Sincerely,



Douglas C. Humphrey
General Manager

F O R T B A K E R

Final EIS

Letter 10. Douglas C. Humphrey, General Manager, Sausalito-Marín City Sanitary District, December 1, 1998.

10-A

Comment noted. As requested, NPS will provide plans to the District once they are completed and available.

10-B

Commented noted. Section 3.12.2 of the Final EIS has been corrected to reflect more recent information related to wet weather flows. The planned repair and replacement of sewer systems that contribute to the noted problems is a high priority both at Fort Baker and in the Marin Headlands. Funding has been allocated for identification and repair of inflow and infiltration problems in the Marin Headlands, with work anticipated for completion in 1999 and 2000.

10-C

In response to the commentor, more specific wastewater flow information has been added to Section 4.2.12.2 of the FEIS regarding flows as they relate to this project. (Also see response to comment 7-J.)

10-D

Comment noted, thank you.

10-E

This correction will be made to the final distribution list as requested.

TIM CAMPBELL
TREASURER SECRETARY

OFFICE PHONE
(707) 763-6143



P.O. BOX 481, NOVATO, CA 94948

VIA FACSIMILE

Original via U.S. mail

December 4, 1998

Brian O'Neil
Superintendent
U.S. Department of the Interior
National Park Service
Fort Baker Planning Team, Building 201
Fort Mason, San Francisco, CA 94123

Re: Fort Baker EIS

Dear Ms. Homer:

On behalf of our tribal council, please find enclosed the following comments to the draft EIS regarding the planned reuse of East Fort Baker, in Sausalito, California. These comments are being submitted by our tribal organization which has a vested interest in the effective reuse of East Fort Baker, which is located in the ancestral homeland of the Coast Miwok people.

The tribe has been involved with the reuse process of East Fort Baker since October of 1997. As part of that process the tribe submitted a proposal to NPS planning staff to establish and operate a Coast Miwok Cultural Center as part of the final reuse plan for East Fort Baker. Our comments to the EIS will incorporate both our concerns regarding potential impacts on cultural resources as well as our original cultural center proposal submitted in November 1997.

Introduction Page of EIS

There are four alternatives listed for the reuse of East Fort Baker. Under alternative #3, is the Office and Cultural Center Alternative. Is this where our Coast Miwok Cultural Center proposal is to be considered?

11-A

Introduction Summary - Proposed Plan - Page iii

Under the proposed plan for East Fort Baker, is the NPS Proposed Action which envisions the creation of a conference and retreat center (which under the EIS proposes to occupy every available building eligible for reuse). In addition (on page iv), within the proposed action there are "potential adverse effects" impacts involving the restoration, rehabilitation, installation and improving the structures and the area of East Fort Baker to result in the NPS Proposed Action.

As currently envisioned, the Proposed Action and its accompanying environmental effects and any mitigation measures are of serious concern to the tribe. Each of these concerns will be addressed in their respective sections of the EIS as referenced.

Introduction Summary - Cultural Center Alternative - Page vi-vii

The tribe prefers this alternative to the Proposed Action by the NPS, if it includes our Coast Miwok Cultural Center proposal as submitted in November of 1997. The tribe sees this alternative as more in fitting with the NPS mission, as well as having fewer adverse environmental consequences than the Proposed Action.

The tribe would disagree with NPS Planning Staff on the increased visitor usage and resulting impacts on East Fort Baker due to a facility such as the tribe has proposed. The facility proposed would be low impact, occupying an existing building at East Fort Baker. The proposed daily visitor usage at the Coast Miwok Cultural Center would be less than those average daily visitors to the Bay Area Discovery Museum. The visitors to our Cultural Center would be those visitors already in East Fort Baker who may want to visit the Cultural Center in addition to other facilities in East Fort Baker, such as the Bay Area Discovery Museum.

11-B

1.0 Purpose and Need for Proposed Action

(1.5 Issues - Impacts on Natural and Cultural Resources - pg. 1-4) & (1.7 Selection of Impact Topics - Cultural Resources - pg. 1-6)

The tribe would oppose any impacts to cultural resources located within the proposed action area. This would include any planned disturbance to archaeological resources which may uncover significant cultural resources which might contain Native American burials.

11-C

2.0 Alternatives Including the Proposed Action

(2.6.5 Cultural Resources - Archaeological Resources - pg. 2-27) - There should be no research and or test excavations conducted without Native American participation. Since East Fort Baker is located within the ancestral territory of the Coast Miwok people, our tribe requires that Native American monitors be present (through an MOA) to help identify cultural resources that may be uncovered due the proposed action.

11-D

(2.6.5 Cultural Resources - Native American Consultation - pg. 2-27) - The tribe would insist on consultation prior to any work or discovery regarding prehistoric sites and or burials. This pre-work consultation would result in a Memorandum of

Agreement (MOA) between the NPS and the tribe regarding the scope of work to be completed regarding cultural resources. Objectives and goals would be clearly defined as well as maximizing the protection to both prehistoric sites and significant cultural resources which may include Native American burials. The tribe has entered into several of these agreements with property owners and or developers regarding current development projects located in Marin County. A pre-arrangement consisting of an MOA would ensure that any disturbance of cultural resources would be agreeable to the tribe so long as there is no significant disturbance to these important aspects of Coast Miwok heritage.

11-D

3.0 Affected Environment

(3.5 Cultural Resources - pg. 3-17) - The tribe would like to obtain a copy of the Fort Baker Cultural Landscape Report - NPS 1997a.

11-E

(3.5.1 Physical History - pg. 3-18) - The lands of East Fort Baker are in the ancestral territory of the Coast Miwok people. The land was never given up, sold, exchanged for or included in any treaties by and between the Spanish, Mexican or U.S. government and the tribe. The tribe has ethnohistoric data that a tribal village was directly visible across from the San Francisco Presidio during historic times.

11-F

(3.5.4 Archaeological Resources - pg. 3-20) - All archaeological resources located within East Fort Baker should be preserved and protected as is planned for all the historic buildings located around the parade ground. The tribe would be involved through the implementation of an MOA regarding ANY request for archaeological clearances. There should be a program implemented to identify any and all archaeological resources within East Fort Baker to avoid any archaeological resource predictions. An accurate survey should be completed which would locate archaeological features and allow those features to be inventoried and protected.

11-D

4.0 Environmental Consequences

(Table 4-1 Summary of Environmental Impacts - Cultural Resources)

Under the proposed action, there should not be "no adverse effect" listed under "New Construction". If all cultural resources have not been located or adequately identified, prior to this EIS, then, the NPS is premature in stating that there would be no adverse effect because of new construction. This same concern by the tribe applies to "realignment, improvements, or removal of roads: no adverse effect" under the proposed action.

11-G

As stated previously, the tribe is VERY concerned about potential impacts to archaeological resources as a result of the proposed action. There should be no disturbance, as any disturbance to these sites would have an adverse effect from a tribal perspective. Again, we feel NPS is wrong in stating disturbance to these sites would have "no adverse effect".

(Table 4-1 Summary of Environmental Impacts - Cultural Resources - pg. 4-6) - It must be pointed out that under the Office and Cultural Center Alternative, "fewer actions to disturb archaeological resources" is proposed. The tribe would favor an alternative with less impacts to these archaeological resources.

(4.2.5 Cultural Resources - pg. 4-26) - Any maps on archaeology and sensitive cultural resource site locations should be prepared in consultation with the tribe. This type of activity could be included in an MOA with the tribe in order to preserve and protect these vital cultural resources from being severely impacted due to the proposed action.

Any assessment of impacts to the cultural resources would include input from the tribe as allowed under Section 106 of the National Historic Preservation Act of 1966. The assessment of impacts should provide for the maximum protection and preservation of identified and inadvertently discovered cultural resources to the extent that project redesign would occur if adverse effects would be proposed on those affected cultural resources.

11-H

(4.2.5.6 Archaeological Resources - pg. 4-31) - The proposed action calls for redesign away from known archaeological resources. The tribe would like to see the same action should inadvertent discoveries be made during the documentary research and test excavations be conducted as a result of the proposed action. Again, the tribe would insist on monitoring and actively consulting with the NPS regarding this process involving any and all archaeological resources and other Native American cultural resources.

The tribe is not in favor and will not support any archaeological monitoring program which calls for the recording (for cultural preservation purposes) then destroying (through removal) of any discovered cultural resources which may include burials. The tribe feels that these sites are a direct link to the rich cultural history of the tribe and are a vital ingredient to what defines the tribe in contemporary terms. This cultural legacy of the tribe in relation to sites within East Fort Baker should be preserved as a legacy to the park in keeping with the NPS mission.

11-I

4.0 Environmental Consequences

(4.2.9.1 Consistency with Relevant Land Use Plans and Policies - pg. 4-46)
NPS Management Policies - (Cultural Resources) - The tribe believes the best way to "foster, preserve and appreciate the cultural resources located within East Fort Baker" is to develop a Coast Miwok Cultural Center operated by the tribe. The tribe would be the most appropriate group in which to develop the programs of research, treatment and protection and interpretation of the cultural resources located within East Fort Baker. The NPS is in possession of a proposal from the tribe dated November 1997, as what our Cultural Center would consist of and how those programs and initiatives developed by the tribe would be consistent and fulfill the NPS management policy regarding these important cultural resources.

11-J

(4.2.9.4 Potential Effects on Minority and Low-Income Communities - pg. 4-51)

The tribe disagrees with NPS park staff regarding affects on minority populations. The proposed action calls for environmental impacts to archaeological resources which would affect the tribe as a minority population. In addition, since the Cultural Center Alternative is not the proposed action, this has an adverse effect on the tribe as a minority population since the tribe was expected to be considered for a building to house the cultural center within the proposed action.

The tribe has suffered immensely since the first missionaries invaded Marin County in the early 1700's. The tribal culture has been disrupted so much throughout the historical period, that schools in Marin County up till recently were teaching that the Coast Miwok people were extinct. A Coast Miwok Cultural Center would go a long way to establish the Coast Miwok people again in a location prehistorically known to the tribe as well as relate that importance of Coast Miwok history to the visiting public.

11-K

4.4. Environmental Consequences of Office and Cultural Center Alternative

As a reminder, the tribe would submit that the "Cultural Center Alternative would have fewer adverse or beneficial environmental consequences that the Proposed Action".

11-L

(4.4.6.3 Increased Parking Demand due to Increased Visitor Use - pg. 4-70)

The tribe would disagree with NPS staff regarding the increased parking demand as a result of our Cultural Center proposal. As stated earlier, the tribe would be relying on park visitors already in East Fort Baker on some other visit. Whether that visit be educational or recreational based, the tribe foresees no further parking demand, than already exists for access to current facilities within East Fort Baker or that under the proposed action.

11-B

In addition, the tribe would again disagree with NPS staff regarding the increased daily vehicle trips to East Fort Baker for the reason explained under Increased Parking Demand.

11-B

5.0 Sustainability and Long-Term Management

As stated by NPS staff, the Cultural Center Alternative productivity of park resources would be similar to the Proposed Action. In addition, the commitment of resources would be the same as the Proposed Action. The tribe does disagree with the NPS staff regarding the adverse impacts on parking and vehicle trips under the Cultural Center Alternative. Finally, the growth-inducing impacts of the Cultural Center would be comparable to the Proposed Action.

11-B

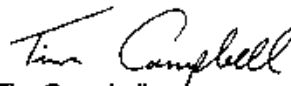
6.0 Consultation and Coordination

(6.3.7 Native American Groups - pg. 6-6) - The tribe (also known as the Federated Coast Miwok) has met with the NPS staff to express their concern about the non-inclusion of the Cultural Center as part of the Proposed Action. The tribe has examined the location of the Cultural Center within East Fort Baker very closely and have determined that such a center would be a fine compliment to the NPS mission as well as a vital component regarding effective cultural resource management within East Fort Baker.

At this point in time there is no formal agreement between the tribe and the NPS regarding any aspect of cultural resource protection that the tribe has brought to the attention of the NPS. The planned discussion and implementation of any archaeological investigation with the tribe is not adequate. Active consultation and a government to government relationship should be instituted with the tribe to preserve and protect irreplaceable cultural resources of the Coast Miwok people as well as to effectively interpret those Coast Miwok resources to the visiting public.

Thank you for your time and consideration of these comments. Our tribe looks forward to hearing back from NPS staff regarding any and or all of the enclosed comments regarding the proposed action and the preferred alternative by the tribe for the eventual reuse of East Fort Baker. If you should have any questions, please feel free to contact our tribal office at (707) 763-6143.

Sincerely,



Tim Campbell
Cultural Resource Officer

cc: F.I.G.R. Tribal Council
California Indian Legal Services
U.S. Senator B. Boxer - California
U.S. House of Representative L. Woolsey - 8th District
State Assemblywoman K. Mazzoni, 6th District
Supervisor A. Rose - Marin Co. Bd. of Supervisors
Native American Heritage Commission
M. Groza - Marin Community Foundation
N. Horner, NPS Planning Staff

11-D

FORT BAKER

Final EIS

Letter 11. Tim Campbell, Cultural Resource Officer, Federated Indians of Graton Rancheria, December 4, 1998.

11-A

The EIS did not include mention of specific new tenants or park partners under any alternative. The purpose of analysis of the Office and Cultural Center alternative was to provide a way to analyze the impacts of using the buildings for a variety of non-profit and/or private uses similar to Fort Mason or the Thoreau Center for Sustainability. The impacts of a variety of office and cultural uses such as the Coast Miwok Cultural Center were evaluated under this alternative.

11-B

Comment noted. Because the proposed Miwok Cultural Center would occupy only 1-2 buildings at Fort Baker, the impacts were analyzed in general along with the anticipated impacts of occupying the remainder of the buildings for similar uses under the Office and Cultural Center alternative. Although visitors to the Cultural Center would draw from visitors already at Fort Baker, it would also be expected to generate new traffic, as would any new uses of buildings. Estimates of traffic generation were conservative, to be sure that they were fully addressed.

11-C

Although there are no known prehistoric/native archeological resources, in areas where NPS believes there may be potential for such resources (such as the waterfront), an archeological investigation would be conducted in consultation with the tribe to identify resources. In all areas of ground disturbance, in the event of an inadvertent discovery during the project, the NPS would stop work and consult with the tribe. There is currently no planned disturbance to prehistoric/native archeological resources. NPS also wishes to avoid disturbing prehistoric/native archeological resources, and will work diligently to do so in coordination with the Federated Indians of Graton Rancheria (the tribe). Please also refer to response to comments 11-D and 11-G below.

11-D

The goal of the NPS and the tribe is the same so far as prehistoric/native archeological resources are concerned: protection and preservation. It is the goal of the NPS to carry out all activities concerning prehistoric/native archeological resources in partnership with the tribe. NPS would like to carry out inventory and identification of prehistoric/native archeological sites in coordination with the tribe as the tribe suggests.

As stated in Section 6.3.7 of the EIS, the NPS would meet with the tribe to plan an investigation of the shoreline area designed to identify prehistoric/native resources for the area affected by bulkhead removal and beach restoration. The NPS would also meet with the tribe to plan investigations of prehistoric/native archeological sites identified through a coordinated survey, for any planned development that would involve ground disturbance near or at areas known to contain prehistoric/native resources or with the potential to contain them. In such cases it is the NPS's practice to work with appropriate American Indian monitors.

If investigations reveal that there are prehistoric/native archeological resources in any project area, and if there would be disturbance of these resources, then the NPS agrees that an appropriate agreement should be carried out regarding treatment of these resources.

FORT BAKER

Final EIS

11-E

A copy of this report will be provided to the tribe, as requested.

11-F

NPS respectfully acknowledges the ancestral connection of the tribe to the land. NPS is interested in learning from the tribe how they understand and interpret the ethnohistory of Fort Baker as well as other lands in Marin County.

11-G

Comment noted. The NPS recognizes and shares the tribe's concern related to potential disturbance of archeological resources. The EIS has been corrected to indicate that disturbance to unknown archeological resources would be a potentially significant impact that would be avoided through the implementation and strict enforcement of mitigation measures similar to the process recently used for the Crissy Field restoration project. (Please note that Table 4-1 represents post-mitigation conditions.) To assess potential impacts to archeological resources, NPS used archival and historic research to identify areas that are potentially sensitive for prehistoric/native archeological resources. The areas identified through research would be evaluated and augmented with ethnographic information identified through consultation with the tribe. Where plans for development overlap with any of the identified areas, an archeological investigation of these areas would be carried out in consultation with the tribe, to determine if there are indeed prehistoric/native archeological resources at these locations. If resources exist in these areas, the goal of the NPS would be to preserve them in place. For all construction activity related to the Fort Baker plan, discovery clauses would be in place calling for stoppage of work in the event of inadvertent discovery of archeological resources. The goal of the NPS will always be to preserve in place (i.e., to avoid adverse effects). If this is not possible, then the NPS would consult with the tribe and develop an agreement concerning treatment of resources that would be mutually acceptable. Implementation of these measures would allow the NPS to avoid significant adverse impacts.

11-H

Comment noted. This is consistent with the course of action that NPS would take.

11-I

NPS would consult and work with the tribe in an effort to identify prehistoric/native archeological resources and preserve and protect them should they be discovered (also see responses to comments 11-C and 11-D).

11-J

Please refer to response to comment 11-K.

11-K

Comment noted. During the planning process, NPS had several discussions and meetings with representatives of the tribal council about the proposed plan, the planning process, the concerns of the tribe, and their proposal for a cultural center at Fort Baker. The proposed plan would use all buildings at Fort Baker for the conference and retreat center, and NPS and existing park partner needs. There are no buildings in the proposed plan that appear to be suitable for a cultural center and not needed to support the conference and retreat center. The tribe could have an important involvement in the program aspect of the conference and retreat center as currently conceived.

FORT BAKER

Final EIS

NPS recognizes the need for a Coast Miwok Cultural Center in Marin County devoted to preserving and interpreting the culture of the native people of the area. NPS believes that a cultural center operated by the tribe located in the park could make an important contribution towards the fulfillment of the NPS preservation mission. NPS has met with tribal representatives, expressing a commitment to develop a partnership with the tribe, and will continue to meet to further develop this partnership including consideration of other options to accommodate the proposed cultural center in an appropriate location within the park. This could include Fort Baker, if future design work identifies appropriate existing buildings that are not required to support the conference and retreat center or other uses identified in the proposed plan. Such action would require additional planning, analysis and environmental review.

11-L

Please refer to response to comment 11-B.

To: General Superintendent
GGNRA
Building 201, Fort Mason
San Francisco, CA 94123

From: Bay Area Sea Kayakers

Date: December 4, 1998

Subject: Response to the East Fort Baker Environmental Impact Statement

The Bay Area Sea Kayakers, otherwise known as BASK, have long used and appreciated East Fort Baker, which we refer to as Horseshoe Cove. BASK became involved in the planning process because we consider this an exceptional kayak launching and access point to San Francisco Bay, The Golden Gate and the outer coast. Our goal is to maintain continued access to East Fort Baker for all kayakers.

Bay Area Sea Kayakers is a non-profit club dedicated to the safe enjoyment of sea kayaking in the Bay Area and beyond. Founded in 1986, BASK sponsors day trips, expeditions and clinics for the development of kayaking skills, and other social events. BASK has a current membership in excess of 500.

The members of BASK, as well as many other kayakers have been enjoying East Fort Baker for many years. As well as an incredible launching spot, East Fort Baker is a beautiful and historic place to visit. This only adds to the kayaking experience.

Intrinsically, kayaking is an environmentally low impact sport. It therefore tends to draw a low impact type of participant. We in BASK greatly appreciate the beauty of East Fort Baker and always strive to minimize our impact there. We actively carpool during our activities and always attempt to leave any place we visit cleaner than when we came.

East Fort Baker is a small oasis of shelter in an otherwise exposed part of the Bay. The calm and protected beach of Horseshoe Cove is in stark contrast to the conditions found just a short distance away. Once clear of the shelter of Lime Point at the base of the North Tower, you are completely exposed to the wind, waves and currents of the Golden Gate. This is the grandest and most exposed place in the Bay. These very conditions and the proximity to the outer coast is what draws experienced kayakers here.

BASK is very pleased with the planning process so far. While we support the Proposed Plan, we find no problem with the other alternatives. This is because we are essentially asking for nothing more than continued access to this great place.

Specifically our interests are:

- Convenient access to the beach with automobile parking to facilitate the loading or unloading of cartop kayaks.
- Convenient day parking, including overnight parking for overnight trips on the bay.
- Nearby restrooms.

12-A

One issue not addressed in the draft is the matter of user fees and parking fees.

12-B

Regarding the overall plan of East Fort Baker, the BASK members who have been involved in this process, support a low impact plan with attention to open space and natural habitats, and the sensible application of sustainability.

- BASK appreciates the sincere efforts of the National Parks Service and all other parties involved. We have enjoyed being part of this process and look forward to a continued active roll at East Fort Baker. It is our sincere hope that East Fort Baker will remain a beautiful and enjoyable place to visit.

Sincerely, The Bay Area Sea Kayakers

Prepared and submitted by Ken Mannshardt
Authorized by the BASK Executive Committee

Ken Mannshardt
843 Kingston Ave.
Oakland, CA 94611
510-653-2628

FORT BAKER

Final EIS

Letter 12. Ken Mannshardt, Bay Area Sea Kayakers, December 4, 1998.

12-A

NPS has worked closely with BASK representatives throughout the planning process to identify and respond to the needs of kayakers. Beach access, space for unloading of equipment and convenient parking would be provided in the proposed plan to accommodate these needs.

12-B

Section 2.6.6 of the Final EIS identifies the use of parking fees for the retreat and conference center as potential measure that may be considered in the future by the NPS to discourage single automobile trips to Fort Baker. Other user and parking fees are not included in the proposed plan.



BAY AREA

discoveryMUSEUM

December 4, 1998

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EXECUTIVE DIRECTOR

Bonnie Turner

Brian O'Neill
Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Dear Brian:

On behalf of the Board of Trustees and the staff of the Bay Area Discovery Museum, I present the following comments on the Fort Baker Plan, Draft Environmental Impact Statement, October 1998 (EIS). The Museum is pleased to have been included in the Fort Baker plan and commends the excellent work of your staff and consultants in preparing this comprehensive document.

We would like to take this opportunity to address five issues in the Environmental Impact Statement: 1) endorsement of the conference retreat alternative; 2) review of the Bay Area Discovery Museum's Master Plan; 3) the need for additional public parking close to the waterfront; 4) support for additional public transportation and; 5) the public planning process that was used to create the EIS.

1. Endorsement of the Conference Center Alternative

The Bay Area Discovery Museum endorses the recommendation of the National Park Service and the GGNRA Advisory Commission to create a conference and retreat center at Fort Baker. This alternative supports the mission of the NPS to conserve natural and historic resources and will also provide for public enjoyment of the site. The 300 to 350-room conference center, located in the historic buildings around the parade ground and in other appropriate buildings as designated in the plan and the 28,000 square feet of new construction will provide adequate space for meetings, dining and accommodations. The plan calls for a private operator to be selected through a competitive bid process managed by the NPS. BADM believes that the development of the conference center with a focus on

Brian O'Neill
December 4, 1998
Page Two

meetings that address environmental and educational issues will be supportive of the Fort Baker site's special features and both the NPS and BADM's missions and goals.

The Museum also supports the additional improvements to Fort Baker recommended in this alternative including:

- The restoration of Horseshoe Bay's beach and landscaping of the waterfront. BADM will be able to use this site more fully for our outdoor education programs.
- The use of the Presidio Yacht Club and related buildings for public use and visitor service activities.
- The conversion of the marina to public facilities.
- Expansion of the Bay Area Discovery Museum with new exhibits and classrooms.
- Open space improvements including interpretative signs, trails and a picnic area.
- Resource protection and enhancement of the natural habitats and historic features of the site, with more than 40 acres of habitat restored.
- Creation of an NPS visitor center.
- Retention of the U.S. Coast Guard Station.

Finally, the Bay Area Discovery Museum strongly endorses the recommendations in the EIS that the NPS maintain primary responsibility for improving the utility structures and other infrastructure needs such as water and sewage. As you know, BADM regularly experiences power outages on the site that significantly effect our ability to operate the Museum.

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2. The Bay Area Discovery Museum's Master Plan

The rationale for expansion and improvements of the BADM is based on 11 years of service to our community, including the operation of the Museum at Fort Baker since 1991. Annually, over 180,000 children and their adult care givers, parents and educators, engage in the Museum's dynamic educational programs and exhibitions focused on the themes of the bay, bridges and boats and interpreted through unique interdisciplinary programs that incorporate the arts and natural sciences. Importantly, over 30% of the BADM's visitors--nearly 55,000 a year-- come on a free or subsidized basis. The Bay Area Discovery Museum has demonstrated its commitment to the National Park Service and the GGNRA through our excellent work as a Park Partner and the raising of over \$7.5 million of private capital to develop our site.

The plan outlined in the EIS fulfills the vision of the Museum to offer an enriched educational environment and to more effectively serve children ages 0-10. BADM's Master Plan is designed to help the Museum accomplish two goals: 1) to increase our educational impact and services to the public and 2) to provide the capacity, support and infrastructure necessary to assure our financial sustainability.

The BADM Master Plan is being prepared by Moore, Iacofano and Goltsman (MIG) of Berkeley. The Master Plan will focus on the increased use of our outdoor spaces and will improve the interpretation of the interior exhibition and program spaces to accomplish our goals. The Master Plan includes recommendations for the development of the Museum's indoor-outdoor site to educate children about the beauty and importance of nature and its forces in sustaining life in the Bay Area. Located at the foot of the Golden Gate Bridge, with its extraordinary vistas and unique access to the Bay, the Museum will engage children in their role as stewards of the local environment and their impact on the planet.

The plan includes the creation of a large-scale outdoor learning environment--Discovery Park--which will include sculpture, water play, and pathways, and will provide opportunities for artists, scientists and children to work together

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and learn how the Bay supports life. In addition, the Museum will create new exhibitions and classrooms to enhance the educational programs. Currently, the Museum is developing an educational framework, *My Place By The Bay*, that will be the core of the Museum's programs and exhibitions. *My Place By The Bay* has been developed with the advice of staff from the GCNRA, scholars and educators. The educational framework will enhance the quality of the visitors' experience and increase their understanding of the ways that the Bay supports life.

The Master Plan, as developed by MIG, recommends the following items, which are included in the Fort Baker Plan, Draft Environmental Impact Statement, October 1998:

- The addition of 25,000 square feet in new construction in buildings to be compatible to the existing structures for visitor services, exhibitions and educational resources.
- The addition of approximately 10,000 square feet of space in existing historic structures (Buildings 637 and 670) for exhibition fabrication, storage and offices.
- The designation of 240 parking spaces for primary use by the public who will visit the Museum. The life safety issues of young families with children crossing streets has been discussed extensively and will need to be addressed in the final design.

The Museum will be launching a major capital campaign from the private sector. The campaign goals include support for the renovations and upgrades of the existing buildings and the development of Discovery Park on the Museum's campus. BADM will make these investments subject to an extension of our Park Partner Agreement.

3. Parking for Public Use at Fort Baker

The increased publicity about Fort Baker over the past few months has dramatically increased the number of visitors to this site. Dog walkers, ski boaters, kayakers, hikers and bicyclists are all using the facilities at the site. BADM remains concerned that when the Fort Baker waterfront, the meadow, public docks and other attractive facilities for public use are completed, there will

13-A

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December 4, 1998
Page Five

be increased demand placed on the parking allocated for the Museum. The Museum strongly supports the public's use of the site and recommends that increased waterfront parking be considered.

13-A

- The Bay Area Discovery Museum supports the EIS planning process that led to the recommendation of 240 parking spaces for the Museum's visitors in two parking areas adjacent to our campus. Changes in the roads are needed to slow down vehicular traffic and provide for safe and secure crossing areas for parents with young children coming to the Museum.

13-B

- BADM supports the concern of the other Park Partners that the EIS needs to increase the number of public parking places close to the waterfront. The increased use of the waterfront by the general public will require additional parking. This may be accommodated through reinforced turf, but the allocation of these spaces is essential if the use of the site by the public is to be fully accommodated and not displace the visitors to the Discovery Museum.

13-C

4. Support for Public Transportation at Fort Baker

The Bay Area Discovery Museum supports the recommendations in the Fort Baker EIS to develop alternative ways for visitors to get to the site, which include:

- The Pedestrian/Bicycle Improvements recommended in the plan will help to increase the use of these methods of transportation by staff and visitors to the site.

- The NPS will coordinate with public transportation officials to determine the best routes and the size of buses that will be on Fort Baker. A public route to Sausalito and the Golden Gate Bridge will provide access for both staff and visitors to the site.

- Promoting ride sharing programs. Currently 20% of BADM's staff is involved in ride-sharing programs.

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- Promoting the development of a shuttle from the conference center to the Sausalito Ferry and airport by the Conference operator.
- Renovating the existing wharf to provide trans-bay ferry service for visitors and employees.
- Working with schools to increase the number of students arriving via buses.

5. The GGNRA's Planning Process for the Fort Baker EIS

The Bay Area Discovery Museum would like to commend the staff of the GGNRA and, in particular, Nancy Horner of the GGNRA and Cathy Barner of the GGNPA, who led the planning for Fort Baker. The Fort Baker project team worked with the staff of the Bay Area Discovery Museum extensively to develop the recommendations in the EIS. The GGNRA and GGNPA met with the Museum's Board to keep it informed of the developments and recommendations in the EIS. We are grateful to you and your staff for your excellent work.

BADM also participated in the public planning process for Fort Baker, including the formal scoping and informal meetings that were conducted to describe the planning process, identify issues and comment on the 1980 GMP development for Fort Baker. In addition, the Museum has participated in the Headland Park Partner meetings that have developed a framework for the relationship and program offerings that might be provided to the conference organizer. The GGNRA has provided the participants in these meetings with helpful and timely information. BADM would like to commend the staff of the GGNRA and GGNPA who have participated in the research, planning and writing of the EIS for their excellent work.

Conclusion

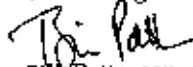
The Bay Area Discovery Museum remains committed to maintaining and building upon our excellent relationship as a Park Partner and resident of Fort Baker. The Museum's commitment is manifest in our willingness to move forward with the GGNRA, to support the EIS and to develop the

Brian O'Neill
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architectural and site plans for our future at Fort Baker. The Museum looks forward to developing a memorandum of understanding with the GGNRA and negotiating our new cooperative agreement as a Park Partner to recognize the EIS commitments and to help us with our fundraising plans.

Thank you for your assistance and cooperation.

Sincere regards,



Bill Patterson
President
Bay Area Discovery Museum

BP:rw

cc: Hamid Moghadam, BADM Board
Kurt Mobley, BADM Board

F O R T B A K E R

Final EIS

Letter 13. Bill Patterson, President, Bay Area Discovery Museum, December 4, 1998.

13-A

Comment noted. Please refer to Master Response #2 – Parking.

13-B

The Proposed Action identifies the need for traffic calming measures to address this concern. Please refer to Sections 4.2.6.5 and 2.6.6 of the EIS for a discussion of the issues.

13-C

Comment noted. Please refer to Master Response #2 – Parking.



THE ENVIRONMENTAL FORUM OF MARIN
P.O. BOX 74
LARKSPUR, CA 94977
TELEPHONE: (415) 479-7914

A NON-PROFIT CITIZEN GROUP DEVOTED TO EDUCATION IN MARIN COUNTY ON ENVIRONMENTAL MATTERS.

December 4, 1998

Superintendent Brian O'Neill
National Park Service
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill:

The Environmental Forum of Marin has reviewed the Draft Environmental Impact Statement for the Fort Baker Plan and submits the following questions and concerns that we request be addressed in the Final EIS.

1. With a conference center at Marshall, is there really a need for a new conference center in this county? Was any research undertaken for the project? 14-A
2. The proposed plan would significantly increase the number of people attracted to the site and would also increase the amount of development by adding new buildings and parking lots. We recommend that a plan alternative be prepared that provides for a level of development that does not exceed the capacity of the existing parking. This would reduce development to a level similar to that which exists now and would, therefore, not increase direct impacts. 14-B
3. Provide more information on the contemplated new trail and existing trails that would be improved by widening or paving. Show these trails on a plan. Provide an more complete analysis of the impacts of increased use of these trails on wildlife and habitats. 14-C
4. How much additional boat traffic is anticipated? Describe the impacts of boat traffic on the birds and other wildlife that use Horseshoe Bay as well as on the quality of water and sediment. We are concerned about bird disturbance and elevated levels of polyaromatic hydrocarbons, arsenic, copper, lead and mercury found near the docks which are clearly from boat use. 14-D

5. The section addressing why a salt marsh was not carried forward doesn't really provide a clear explanation as to why this decision was made. A marsh would provide more habitat value for wildlife and would be an important historic restoration as well. We urge that restoring a section of salt marsh between the restored beach and the upland be reconsidered. It need not extend for the entire length of the waterfront. Salt marsh plants could help to stabilize the shoreline and would nourish the waters of the Bay for fish and other wildlife in addition to providing an educational tool for visitors.


14-E

6. A narrow band of dunes is proposed to be constructed inland of the restored beach. The benefits of and potential for success of the dune system that is proposed would be unclear. The dunes are proposed to have a raised boardwalk for public access running through them. What is the purpose of creating these dunes? What wildlife would use the dunes? Is the dune area wide enough to allow any birds or other wildlife to use it while people are walking on the boardwalk?

14-F

We appreciate your addressing our concerns.

Sincerely,


Julie Grantz
President

FORT BAKER

Final EIS

Letter 14. Julie Grantz, President, The Environmental Forum of Marin, December 4, 1998.

14-A

Current market demand was considered as part of the planning process, and confirmed that there is a high, unmet demand for retreat/conference center uses in the region.

14-B

See Master Response #2 – Parking.

14-C

The approximate alignments of all existing and proposed trails are indicated in the EIS. Only one new trail is proposed – a 400-foot segment described in Section 2.2.6 and shown in Figure 2-2b. The habitats bordering trails are shown in Figure 3-6 and described in Section 3.3.4. Impacts of trail use on wildlife are addressed in Sections 4.2.4.1 and 4.2.4.7.

Figure 2-2 has been modified to specify new trail areas.

14-D

The Proposed Action would result in a reduction in the total number of slips/moorings provided in Horseshoe Bay (from 70 to 60 boats). Impacts to wildlife are addressed in Sections 4.2.4.1 and 4.2.4.7. Because boat ramp parking will be less convenient, the number of boat ramp users is not expected to grow. A primary source of existing pollutants in sediments is past boat maintenance practices by the Army. Boat maintenance is currently prohibited and will not be permitted in the future. Section 4.2.4.12 addresses the impact of boating on water quality and sediments. Sections 2.6.3 and 2.6.4 outline mitigation measures for boating impacts including education of boaters, and monitoring use of the boat ramp and water quality.

Conformance with water quality objectives and numerical water quality standards established in the Regional Water Quality Control Board's (RWQCB) Water Quality Control Plan would protect established beneficial uses of the bay, including contact and non-contact recreation. Additionally, the State of California can regulate water quality through the Water Quality Control Plan for Inland Surface Waters and the Enclosed Bays and Estuaries Plan, which established numerical objectives for priority pollutants such as trace metals and synthetic organic compounds discharged to inland waters and estuarine environments.

14-E

Comment noted. Section 2.7.2 of the EIS includes an explanation for the decision to remove the "Maximum Natural Resource Restoration" alternative from further consideration. As discussed in that section, the limited space available was considered marginal for a successful project. Consideration of public access, potential conflict with preservation of the National Register Historic Landmark District, and high costs especially given existing NPS commitments for large-scale restoration efforts in other areas within the GGNRA. The EIS also indicates that this alternative would not be precluded by implementation of the Plan, should conditions change making this alternative or some variation of it more feasible and consistent with the NPS mission and Plan objectives.

14-F

See Master Response #3 - Treatment of Waterfront.



4 December 1998

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing on behalf of the Fort Point and Presidio Historical Association, on whose board I sit, and where I serve as co-chair of the architecture and archaeology committee. Our comments are informed by our participation in workshops and tours organized by GGNPA and the Park Service, and based on a review of the Draft Environmental Impact Statement, and two meetings with staff. We have completed our review of the EIS, and have the following comments to make.

Our main concern is always that the cultural history be respected and appropriately interpreted and the historic fabric be treated well and that the balance between the future uses and the historic past is comfortable. The current Proposed Plan appears to be a balanced, feasible and respectful approach to the goals of public participation, preservation historic fabric, and we are delighted that the process has resulted in a plan which proposes to preserve and share the special qualities of the site.

We definitely prefer the "proposed action" plan despite some concerns. Our concerns are the following:

1. It is important to us that the Fort Baker plan include a plan for the conservation and interpretation of Battery Cavallo. Although this last item has been made a separate project, we feel that it is key to the understanding of East Fort Baker since it provides a tangible proof of its historic purpose. Interpretation of Battery Cavallo will help to motivate the interpretation of the entire site, as well as adding an opportunity for enjoying inspiring views. 15-A
2. A lack of maintenance of the existing structures *during the transition period* appears to be a serious issue. This issue was raised by the National Trust representative, Courtney Damkroger, and has serious impact on historic resources beyond anything outlined in the plan. Perhaps it merits being discussed in the EIS. A plan for maintaining and stabilizing the existing buildings in case the Army fails to do so should be provided, beyond that provided (after take-over) in paragraph 4.4.5.1, along the lines of paragraph 4.5.5 in the "no action alternative." 15-B
3. The proposed expansion of the Bay Area Discovery Museum, and the increased amount of traffic it may generate in the future, may cause an adverse effect. The monitoring of visitor impacts will be essential as well as some strategies to contain, control or mitigate this increase. 15-C

Page 1

P.O. Box 29163 • Presidio of San Francisco, California 94129 • 415.921.8193

- | | |
|---|--------------|
| 4. There should be ferry service to the site as a way of intensifying the visitor's arrival with changing views of the enhanced site. It would also aid with interpretation of the site in relation to its role in coastal fortification. Finally, it would help to reduce auto traffic and parking needs. | 15-D |
| 5. The existing mooring slips should be preserved as the preferred method of mooring small craft, since the bay is too small to accommodate many moorings. In addition, the fact that these slips provide habitat for juvenile dungeness crab is an additional argument for retaining them. | 15-E
15-F |
| 6. The boardwalk through the restored meadow seems a cumbersome, expensive, high maintenance and intrusive feature. Could there be less of it? Or could disabled access and view of the restored meadow be provided from the beach or the lawn? If the plant species used truly are those that "can accommodate informal recreational uses, (paragraph 2.2.5)" perhaps paths would work as well. Elsewhere, it appears that foot traffic is viewed as potential disturbance (paragraph 2.6.2). The boardwalk seems more appropriate when the plants are more vulnerable to damage by "informal recreational uses." Perhaps paths could be provided in conjunction with coastal protection, such as the "riprap revetments at the boundaries of the beach," if such are needed (4.2.1.2) | 15-G |
| 7. The conference center should be worked out at the lowest economically feasible size to preserve the tranquillity which makes Fort Baker special. Concerns about the pressure of traffic and wear and tear are ongoing. Monitoring only helps if there is a remedy available, and prevention and anticipation of problems will work best. | 15-H |
| 8. The new uses and activities of the conference center must contribute to the mission of the Park Service, and not be too orthogonal to it. We recognize this to be in your evaluation criteria, but we will be watching with interest to see its working out. | 15-I |
| 9. There should continue to be a helpful nautical presence in the form of volunteers or park partners to keep the present Travis yachtspeople on board. Their presence is a way of maintaining some military presence, and connection with the past which will otherwise only exist in the structures. | 15-J |
| 10. Some of the Capehart housing should be reserved for employees, both to preserve a presence and cash flow during slow times, and to reduce the traffic and parking needs on site. | 15-K |
| 11. The character of the site lighting should be in keeping with its history, and that its "natural darkness" be preserved (surely a sustainable approach). The provision of adequate security could be provided by lighting the users rather than the space. | 15-L |
| 12. There is no definition of "traffic calming features" (paragraph 2.6.6), which one assumes are bumps in the road, stop signs, poorly banked curves, traffic circles, etc., but one hopes traffic calming features will not be employed to the extent of becoming an annoyance. | 15-M |
| 13. It might be best to consider actually separating pedestrian and bicycle traffic. (paragraph 2.6.6) | 15-N |

14. Consider use of Clivis Multrum or other similar composting toilet alternatives, at least in new structures, to avoid adding to the wastewater system load. (paragraph 2.6.10)

15-O

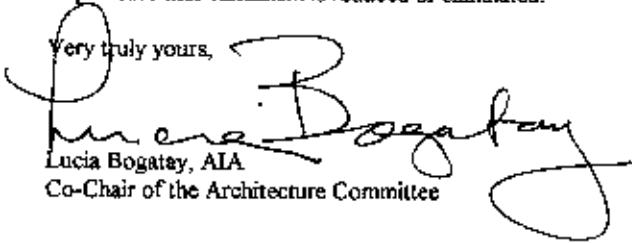
15. Typo on page 3-18 fourth paragraph "sixtel6en" should be "sixteen" or "16."

15-P

We applaud the effort and the process by which this excellent plan has been brought forth, and we will watch with interest as it comes to fruition. We urge the NPS to open Battery Cavallo on a limited basis, as soon as practicable, both give the public an appreciation for its importance to the site, and to help ensure that vandalism is reduced or eliminated.

15-Q

Very truly yours,


Lucia Bogatay, AIA
Co-Chair of the Architecture Committee

cc: Steve Haller
John Martini
Nancy Horner
Courtney Damkroger

FORT BAKER

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Letter 15. Lucia Bogatay, Co-Chair of the Architecture Committee, Fort Point and Presidio Historical Association, December 4, 1998.

15-A

See Master Response #4 - Battery Cavallo.

15-B

The National Park Service cannot do maintenance and stabilization activities on buildings it does not control. The Army will not transfer the buildings to the Park Service until 2001. Until that time, the NPS will continue to monitor the Army's maintenance and stabilization program. The NPS has submitted a *Conditions Report* to the Army describing in text and photographs all required historic building repairs. The NPS meets quarterly with the Army concerning maintenance and stabilization issues and has secured agreements to turn on heat, complete a pest report and repair roofs, gutters and downspouts. A weekly inspection by NPS maintenance staff of all Army buildings will be initiated to continue regular oversight of existing conditions.

15-C

Comment noted. Please refer to Section 2.6.6 of the FEIS for a description of the traffic and circulation mitigation measures that would be implemented to minimize the effect of Proposed Action. Among the measures listed is implementation of a Traffic Demand Management (TDM) program. As described in Section 2.6.6, the proposed BADM expansion would be phased to ensure that the TDM is in place prior to occupancy. Visitor impacts would be monitored through the implementation of a monitoring program by NPS (also described in Section 2.6.6).

15-D

See Master Response #5 – Ferry/Water Shuttle.

15-E

See Master Response #6 – Preference for Docks over Moorings.

15-F

Comment noted. As stated in Section 3.4.4, Horseshoe Bay is part of the Dungeness crab migratory corridor between the gulf of the Farallones and San Francisco Bay. San Francisco Bay is usually only habitat for juvenile Dungeness crabs, although a mixing of adults and juveniles can typically be found at Horseshoe Bay due to its proximity to the Golden Gate Bridge and open water. Most juveniles are oriented toward the sandy bottom and open mud flats for foraging, however, they have also been associated with pier pilings, which they seem to use for protection from predators. Juvenile Dungeness crabs can be found around pilings, picking animals out of the substrate (pers. comm., Bob Tasto, California Department of Fish and Game, 3/8/99). Although implementation of the Proposed Action would reduce the total number of berthing slips at Horseshoe Bay, some slips and the existing fishing pier would continue to be provided at the marina facility.

15-G

See Master Response #3 - Waterfront Treatment and the response to comment 16-O.

15-H

Comment noted, thank you. The NPS concurs with the commentor. Protection of Fort Baker's special qualities is identified as a goal of the Plan (refer to Section 1.3) and will be considered

FORT BAKER

Final EIS

throughout future implementation and planning for the site. The Final EIS has been refined to include additional traffic mitigation to further reduce potential traffic effects, please refer to Section 2.6.6 for additional detail.

15-I

Comment noted. Development of the program component of the conference and retreat center would focus on attracting and convening conferences that relate to themes that connect to the NPS Mission.

15-J

Comment noted. Fort Baker's military history will play an important role in NPS interpretative programs, as described in the proposed Plan (September, 1998). With regard to Travis AFB presence at Fort Baker, please refer to Master Response #7 – Preference for Retaining PYC/Travis AFB.

15-K

Comment noted. Use of on-site residential units for conference and retreat center staff and possibly for visiting scholars was considered under the Proposed Action. Section 2.2 of the Final EIS has been revised to clarify this issue. On-site housing was also included as part of the Office and Cultural Center and No Action alternatives. For a discussion of the mitigation measures that would be implemented by the NPS to reduce traffic and parking effects associated with the Proposed Action, please refer to Section 2.6.6 of the Final EIS. Master Response # 3 – Parking also addresses this issue.

15-L

Mitigation to avoid impacts of night lighting is included in the DEIS in Section 2.6.8 (Protection of Natural Darkness), and 4.2.10.5 (Impacts to Natural Darkness due to Increased Lighting).

15-M

Traffic calming measures include street design and traffic control measures intended to reduce speed, noise, and impact of traffic. Such measures can include reducing lane widths, lowering speed limits, addition of stop signs, pedestrian refuges, medians, and other techniques to improve the safety of visitors and reduce the speed of cars.

15-N

Section 3.6.6 includes a discussion of the constraints to providing separate access for bikes and pedestrians. In general the existing road widths, lack of sidewalks, and other site conditions, such as sensitive natural resources, limit the ability to provide separate bike and pedestrian paths.

15-O

Comment noted. The use of composting toilets would be considered as appropriate during the implementation of the plan.

15-P

Comment noted. Correction made.

15-Q

See Master Response #4 - Battery Cavallo.



Marin Audubon Society Box 599 Mill Valley, California 94942-0599

December 4, 1998

Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 291
San Francisco, CA 94123

RE: FORT BAKER DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Superintendent O'Neill:

The Marin Audubon Society appreciates the opportunity to comment on the DEIS for the Fort Baker Plan. We agree that potential damage to the ecological values of the site could result from the increased development of the site and public use generated by the project. It is not clear, however, that the environmental impacts would be less than significant or that the proposed mitigation measures would be adequate to reduce the significance of the impacts. We are particularly concerned about increased impacts on wildlife and loss of habitat.

We request that the following information:

• Evaluate the conformance of the project with the NPS mission "dedicated to conserving unimpaired the natural... resources of the National Park System..." It appears that a number of components of the project would not conserve the natural resources of the park but, to the contrary, would degrade or destroy them. Water/Bay resources of Horseshoe Bay, wildlife and endangered species, and dredging impacts are of particular concern. In accord with the mission, the Objectives related to Environmental Impacts should call for avoiding adverse impacts, not just minimizing these impacts.

16-A

• To better address resource conservation, we request that an Environmental Alternative be developed that includes: eliminating or significantly reducing marina facility and dredging (see discussions below), avoidance of all impacts to eelgrass, restoration of tidal salt marsh along the waterfront, instead of sand dunes, and avoiding trails through Mission Blue Butterfly Habitat.

16-B

• Describe the analysis that was undertaken to determine the need for the project. Because the project will change the character of the site and damage natural resources, a clear beneficial public need for the project should be demonstrated.

16-C

• Marina/Dredging Issues: The proposed maximum number of slips is stated to be 60. Would the water coverage and number of boats be reduced from the existing number so that impacts could also be reduced? Are any sections of Horseshoe Bay currently closed to boat use? Would those areas remain the same or change under the Plan? We are concerned that boating impacts to wildlife be avoided to the maximum extent possible.

16-D

Other related questions: How would it be assured the number of boat moorings would not be increased in the future? What if a private operator cannot be found for the marina? Who pays for the dredging and disposal?

16-E

Dredged sediments are currently disposed of at Alcatraz. The Department of Interior July '9, 1996 comment letter on the LONG TERM MANAGEMENT STRATEGY FOR



A Chapter of National Audubon Society

THE DISPOSAL OF DREDGED MATERIAL raised numerous issues related to the disposal of dredged material at the Alcatraz site and the impacts of this activity on the bird populations nesting on Alcatraz Island. This EIS should address the sediment, water quality and other impacts of GGNRA disposing of its own sediments, and the contribution of these sediments to the cumulative adverse impacts, at the Alcatraz disposal site. How can GGNRA justify disposing of material that is resulting in adverse impacts to an important resource GGNRA is responsible to protect? GGNRA's sediments are just as impacting as dredge material from other locations, and they are perhaps worse than some because of the elevated concentrations of chemicals (page 3-8). If dredging continues at Horseshoe Bay, GGNRA should seek another disposal site, preferably an upland site, in accord with the LTMS program.

16-F

Every effort should be made to reduce or eliminate dredging in order to avoid or significantly reduce the dredging related impacts. In addition to eliminating impacts at the Alcatraz disposal site, reducing turbidity in Horseshoe Bay and reducing or eliminating impacts on water birds using the Bay, chemicals in docking area identified on page 3-8 would be avoided or minimized if dredging were eliminated or reduced.

16-G

As a first step to reducing these impacts, the need for dredging should be determined. How much of the 15,000 cubic yards currently dredged is to maintain navigability for the marina and how much for the coast guard? How frequently does dredging need to occur? How much dredging could be eliminated by eliminating or significantly reducing the 60 berthing slots?

16-H

To reduce dredging and disposal impacts, we recommend that the marina be eliminated or the number of boat slips that require dredging should be significantly reduced or eliminated. The only dredging that should be assured would be for emergency use of the Coast Guard. If the Coast Guard currently requires dredging, relocating them to a place that would not require dredging should be evaluated.

16-I

The discussion on page 2-16 indicates that water-based transportation could be provided in the future and would be the subject of a separate environmental analysis. If this is a future possibility, the potential impacts should be addressed in this DEIR where they can be better analyzed for individual and cumulative adverse impacts.

16-J

• Waterfront Marsh/Dunes: Extensive active uses are proposed along the shoreline of the waterfront. In fact, it appears that resource protection is being ignored in favor of active recreation along this entire waterfront.

16-K

Historic photos of the site show a cove with extensive salt marsh inland from the shoreline. However, the preferred project would create dunes which would not promote the natural functions of the ecosystem. Further, even if it would be habitat for some wildlife, the drawings show a slightly raised boardwalk public access path through the dunes. There should be a discussion of what wildlife this dune would be expected to support and an assessment of the habitat value the dune would have with a trail and people walking through the narrow band of dunes. We don't see any biological value for this artificial habitat and suggest that it would be a waste of public money to create it.

16-L

Wetlands, however, did exist historically on the site. We still believe that a coastal marsh should be restored behind the proposed fringe beach as once existed on this site. The arguments at 2.7.2 page 2-33 as to why restoring salt marsh habitat was not given further consideration are not convincing. The explanation states that marsh restoration is considered marginal for a successful project. What are the reasons for this assessment? We don't see why the potential for a successful salt marsh restoration are less optimistic than for a creating a dune system that never was there. Marsh restoration would be accomplished by removing the wooden bulkhead, riprap and fill and

16-M

restoring a section from the Bay edge to an elevation suitable for marsh plants to recolonize.

Further, we see no reason why restoration of a tidal salt marsh would be any more maintenance intensive, and therefore expensive, than the proposed dunes. If restored to the appropriate elevations, a salt marsh would take care of itself. Why couldn't grant or mitigation funding be obtained for a wetland project at this site as has occurred at Crissy Field? Why should this site be denied a marsh restoration simply because other marsh restoration projects are being considered elsewhere? A marsh would have much more ecological benefit and have just as great a success potential than the proposed dunes. Sand dunes could blow away and would be much more subject to people going off the boardwalk trampling the vegetation. Some people are less inclined to tromp through marshes because they are wet.

The primary justification for not having a marsh seems to be that a marsh is viewed as being incompatible with the anticipated public uses and access requirements. We submit that any access can be provided around and inland of a restored wetlands. The notion that an historic habitat that is reduced by about 90% in the Bay, and that would provide an vital benefits to the resources of the Bay, is being rejected because it would interfere with public access is way out of line with the mission of GGNRA, and should be rejected.

We strongly recommend that an option of restoring a salt marsh be revisited and that the additional wave study also include additional study of potential marsh restoration. The primary reason for promoting a marsh restoration is that a salt marsh would have many benefits. It would help to filter and absorb pollutants from the Bay, thereby improving the water quality and habitat, be a food source for fish and wildlife using the bay and that would be attracted to the marsh itself. It would also be used to educate people about the historic conditions of the site.

With regard to creek restoration, if creeks can be daylighted in the City of Berkeley, we see no reason why that could not occur here. It sounds as though the preservation of cultural resources are being given far greater preference than restoration of native creeks which, it should be recognized, predate the fill and development on the site.

• Several new parking lots to accommodate 50 and 60 cars as well as other parking areas are proposed. How many new parking spaces are proposed over the existing number? The much expanded parking and other facilities would increase urban runoff from the site into Horseshoe Cove? What surface would be placed on the proposed parking lots? Vegetated buffer is desirable as described on page 4-18, but we suggest pervious surfaces, such as gravel and blocks, also be used on the parking areas because they allow runoff to be filtered through the earth before reaching the Bay.

• Trails: The impacts of the trail system are not clear. To enable the reader to assess the impacts, a site plan showing the trail and the habitats it would pass through or near, should be provided. What type of surfaces would be used for the trails? Describe where trails would go through habitats, instead of around or near habitats, and identify the buffer width proposed for each area.

Please address the potential impacts of the proposed boardwalk-trail through the proposed dunes. We are not clear that any wildlife would be able to use the dunes. The dune is so narrow and the boardwalk is shown extending right through the middle of it. Discuss what wildlife species would use dune habitats, whether these species exist in the area, and whether they could be expected to stay or abandon the dune habitats when people are using the boardwalk.

16-M

16-N

16-O

16-P

* Show on a site plan where the overnight campsites would be located. What impacts are anticipated from this construction and use? What provisions would be made to ensure impacts of overnight camping would be minimal?

16-Q

* Eelgrass is an important habitat that is limited in the San Francisco Estuary. Every effort should be made to avoid impacts to the eelgrass habitat and to promote its expansion.

The discussion on page 2-25 does not address avoidance and protection of the eelgrass beds and is not clear about impacts of the project on eelgrass. The discussion should be expanded to clearly indicate whether eelgrass would be impacted with the preferred alternative, what impacts would be anticipated, and to identify mitigation measures to ensure the impacts are avoided or mitigated. To enable the reader to assess impacts, the location of the eelgrass beds should be shown on a figure.

The discussion recognizes that eelgrass does better when water is less turbid. Is any dredging done near eelgrass now? Where would future dredging occur?

16-R

The discussion indicates that a plan to restore/enhance eelgrass within Horseshoe Bay would be prepared and implemented later. This is not adequate if it is intended to mitigation for project related impacts to eelgrass because there is no indication that eelgrass can be successfully restored. Attempts to restore eelgrass in the bay that have all been unsuccessful (see Port of Oakland 150 foot Dredging Project EIR and Caltrans Bay Bridge EIR). Because of the sensitivity of this resource and uncertainty of replacement techniques, every effort should be made to avoid impacts to eelgrass. A plan to mitigate unavoidable impacts to eelgrass should be prepared now and presented for review.

Eelgrass mitigation also should include a commitment to protecting eelgrass beds by prohibiting boats, unless it is absolutely certain that boats would have no adverse impacts. We recommend that dredging be prohibited near eelgrass beds and the use of pesticides, herbicides and fertilizers be prohibited at all times of year to avoid impacts to eelgrass and the waters and fish using the bay.

* Migratory Birds/Wildlife: Migratory Birds that depend on open water and shoreline habitats should be discussed in the Biological Resource discussion. The discussion on page 2-25 and 3-15 only addresses upland species. Horseshoe Bay is one of the few areas in the Bay that pelagic birds, such as murres, loons, species use along with other diving birds, such as grebes, brown pelicans, and diving ducks can be found. The DEIS should address the use of Horseshoe Bay and adjacent waters by diving birds and how the project, particularly the boating and dredging components, would impact these species.

16-S

GCNRA should have surveyed during overwintering season migration, and spring nesting to determine actual resource value of uplands and waters. In our view the project, particularly the boating and dredging components, would adversely affect coastal water habitat and diminish water quality, habitat for endangered species brown pelican and possibly endangered salmon and steelhead.

Building removal and rehabilitation could not only adversely affect bats, but any swallows that nest in the vicinity. What nesting season should be avoided.

16-T

Increased visitor use along Horseshoe Bay and kayak and boat use in the water would increase disturbance of marine mammals, sea birds and migratory waterbirds. Increased kayak and boat use would cause wildlife to avoid areas or to fly away and should be addressed as an impact. No mitigation measures are proposed to eliminate or reduce this impact. The DEIS should address this issue. Mitigation to reduce these impacts should include restricting boat use

16-U

in one or more specific areas and restricting use of a section of shoreline adjacent to the restricted boating area. Perhaps this also could be in area where there is eelgrass. Also, instructional material should be developed for kayakers warning them to avoid birds and marine mammals, and if necessary, further restriction should be enacted.

16-U

Regarding wildlife impacts of increases public use on-shore, we strongly recommend that no trails be located in areas where nesting and roosting marine birds could be impacted. All trails should be limited to 300 feet or more away from sensitive habitats.

16-V

• Use by neotropical songbirds and specialized resident species of local importance such as wrenit should be addressed more thoroughly. We cannot believe no nontropical songbirds nest on the site. Would any areas of native habitat be destroyed for parking lots and buildings and trails?

16-W

16-X

• Removal of non-native trees: We strongly support the removal of non-native eucalyptus, acacia, Monterey Pine and Cypress and restoration to native tree habitats.

16-Y

• Bats: We recommend avoidance of bat habitat areas be implemented as a mitigation.

16-T

• Mission Blue Butterfly: Not clear that 50 feet buffer is enough to reduce or eliminate dust impacts. We recommend that no work be done during time the butterfly are present.

16-Z

Thank you for responding to the issues raised above.

Sincerely,

Barbara Salaman, Chair
Conservation Committee

FORT BAKER

Final EIS

Letter 16. Barbara Salzman, Chair, Conservation Committee, Marin Audubon Society, December 4, 1998.

16-A

The mission of the NPS is stated below:

“The National Park Service is dedicated to conserving unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The National Park Service is also responsible for managing a great variety of national and international programs designed to help extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.” (NPS Strategic Plan)

The proposed rehabilitation and reuse of historic buildings, the plans for habitat restoration, the improvements for public access and the mitigation included in the Proposed Action have created a project that is consistent with the NPS Mission. For a discussion of issues related to dredging, please refer to Master Response #9 – Dredging.

16-B

Comments noted. The environmental issues raised in this comment are discussed in greater detail in the later comments presented in this letter. Refer to these and the corresponding responses for a comprehensive response. Please note that the proposed beach restoration would be to coastal strand habitat.

16-C

See Chapters 1 (Purpose and Need), 3 (Affected Environment), and 7 (References) for information on the project need and analysis conducted in support of the planning and environmental review process. Throughout Chapter 3, the analysis and sources of information are described under each topic heading. Analysis of the existing conditions of the cultural and natural environment, evaluation of the condition of buildings and infrastructure, an inventory of natural resources, and the public scoping process were used to evaluate the need for the project.

16-D

Water coverage would be reduced under the Proposed Action because of the conversion from docks to mooring buoys for a portion of the boats that would be accommodated. In addition, an overall reduction from 70 to 60 boat spaces would occur under the Proposed Action. No sections of Horseshoe Bay are currently closed to boats. Section 2.6.4 includes mitigation for eelgrass beds including education, signs and restriction of boats from eelgrass zones. It also includes signage and materials to educate boaters and other visitors to protect wildlife. Please refer to Master Response #9 – Dredging.

16-E

The maximum number of boats accommodated under the proposed Plan is clearly identified in EIS (see Section 2.2.3). The NPS would be responsible for determining the instrument for operation of the marina. NPS would be responsible for future dredging and disposal costs related to the marina. Please refer to Master Response #9 – Dredging.

FORT BAKER

Final EIS

16-F

Dredging would only be conducted to the extent necessary to allow for Coast Guard operations and the marina small boat use to continue. Please refer to Master Response #9 – Dredging, for a comprehensive response to dredging-related issues raised during the DEIS comment period.

16-G

Please refer to Master Response #9 – Dredging.

16-H

Please refer to Master Response #9 – Dredging.

16-I

Closure of the marina and removal of the docks and related structures was analyzed under the No Action Alternative (2.5.3). Please refer to Master Response #9 – Dredging that addresses dredging-related issues raised during the DEIS comment period.

16-J

See Master Response #5 - Ferry/Water Shuttle.

16-K, L

See Master Response #3 - Treatment of Waterfront.

16-M

The NPS believes that the factors presented in Section 2.7.1 provide an accurate assessment of why restoration of the historic salt marsh and creek at Fort Baker were removed from further consideration at this time. The commentor's recommendations and criticism of these factors and conclusions are noted, and were reviewed and considered by the NPS planning team.

16-N

See Master Response #2 – Parking.

16-O

See the response to comment 14-C regarding trails, and Master Response #3 (for waterfront treatment). The boardwalk will protect the coastal strand area, accommodating walking and hiking through the waterfront. The boardwalk will enhance access to the waterfront for people of all physical abilities and provide interpretive and other informational displays.

Paving of trails is not proposed. Surfaces may be improved but would be permeable except where existing surfaces are paved.

16-P

See Master Response #3 - Treatment of Waterfront.

16-Q

Overnight camping is not included in the Proposed Action. It was included in the 1980 General Management Plan alternative.

FORT BAKER

Final EIS

16-R

Impacts to eelgrass are discussed in Section 4.2.4.6 of the EIS. As stated in that Section, eelgrass beds located along the bulkhead could be damaged during construction activities or through temporary increases in turbidity due to construction. Approximately 90 plants are located along the north shore that could be impacted in the short-term by the Proposed Action. The total number of eelgrass plants in Horseshoe Bay is approximately 260, accounting for approximately one percent of the total eelgrass population currently existing in San Francisco Bay. Please refer to comment 3-A and the accompanying response.

Figure 3-6 of the EIS (Vegetation and Habitat Map) provides the location of eelgrass within Horseshoe Bay.

In the recent past, dredging activity has occurred on the other side of Horseshoe Bay, away from the northwestern perimeters where eelgrass is located. Locations for future dredging are dependent upon movement and buildup experienced on the Bay floor, as a result of wave-generated surge and erosion. Pre-project and post-project surveys for eelgrass would be required prior to implementation of any dredging. Please refer to Master Response #9 – Dredging.

Mitigation measures incorporated into the Proposed Action to protect eelgrass are included in Section 2.6.4 of the EIS. In addition, it was noted that a plan to restore/enhance eelgrass would be prepared and implemented at a later date. This is not intended to mitigate for impacts on eelgrass, but simply reduce impacts. Other mitigation considered includes installation of silt fences and relocating plants and associated animals to other areas of the bay. All feasible efforts would be made to avoid impacts to eelgrass.

As identified above, boats would be restricted from eelgrass zones in Horseshoe Bay. This measure, combined with an avoidance of dredging activities in eelgrass areas where feasible, would enhance the potential establishment of shallower eelgrass in the long-term. Pesticide use would be restricted during the winter and spring and subject to compliance with prescribed Best Management Practices (BMPs) during the remainder of the year, aimed at compliance monitoring for contaminated runoff from the site. Periodic monitoring of runoff would be conducted to ensure compliance with identified parameters and maximum contaminant levels. Herbicide use would be limited and performed in accordance with the NPS integrated pest management species.

16-S

Resident and migratory birds that depend on open water and shoreline and upland habitats may be disturbed as a result of the noise and disturbance associated with construction, vegetation removal, and habitat restoration. Section 2.6.4 of the EIS describes mitigation to reduce impacts to migratory birds, nesting birds, and wintering waterbirds. All removal of vegetation, as stated in Section 2.6.4, would follow GGNRA guidelines for protection of nesting birds. Sections 4.2.4.7 and 4.2.4.9 address impacts to waterbirds, seabirds and land birds.

A Natural Resources Inventory was prepared for the project site prior to the DEIS. In addition, the Point Reyes Bird Observatory, under contract with the NPS, conducted 6 winter water bird surveys within Horseshoe Bay from December 1998 to February 1999. These surveys were conducted as part of an ongoing inventory of avian resources within GGNRA. Surveys could not be completed of the nearshore area, from the fishing pier to Lime Point, due to ongoing lead remediation for the seismic retrofit of the Golden Gate Bridge.

FORT BAKER

Final EIS

Diving birds could temporarily be disturbed as a result of construction activities at the pier and marina. In addition, increased recreational boating and use of the boat ramp may disrupt wintering water birds and diving birds in the area. However, mitigation incorporated into the Proposed Action (2.6.4) would minimize disturbance to winter water birds and herring spawning. Impacts of construction and dredging would be temporary in nature and no long-term adverse impact is anticipated. Please refer to Master Response #9 – Dredging.

16-T

Comment noted. As stated in Section 2.6.4 under “Nesting/Migratory Birds,” park guidelines would be used in implementing proposed vegetation removal and/or construction activities at Fort Baker to avoid or minimize impacts to nesting birds including cliff swallows nesting on buildings. The park guidelines require a search for active nests sites prior to construction and restrictions on timing of proposed construction activities so that disturbance to nesting species is avoided. As noted by commentor, bats could also be effected during construction activities, and mitigation also presented under Section 2.6.4 (“Bat Survey”) addresses this issue.

16-U, 16-V

Mitigation to reduce the impacts raised by the commentor are included in DEIS Section 2.6.4.

16-W

Due to the lack of natural habitat, only limited nesting of neotropical songbirds and wrenit is expected to occur. Although noise and disturbance associated with construction, vegetation removal, and habitat restoration activities might temporarily disturb nesting birds, mitigation incorporated into the Proposed Action addresses those impacts (2.6.4: Nesting Birds and Vegetation Removal).

16-X

The effects of project implementation on native habitat is addressed in Section 4.2.4 of the EIS. In summary, all new construction, buildings and parking lots are proposed within previously disturbed areas. Existing trails would be improved where surfaces are degraded or where improvements to access are possible without conflicting with other resource values. New trail construction is proposed to create a loop trail from Battery Duncan to the parade ground area. As described in the EIS, construction would occur in conjunction with habitat restoration and this trail would be constructed in grassland. (Please refer to Section 4.2.4.4 and see Figure 3-6.) Mitigation for these effects has been incorporated into the Proposed Action as described in Section 2.6.4 of the EIS.

16-Y

Comment noted.

16-Z

Comment noted. Dust control is also included as mitigation in DEIS Section 2.6.7 and 2.6.4. Proposed restrictions are consistent with those established by US Fish and Wildlife Service for similar projects.



MARIN CONSERVATION LEAGUE

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November 5, 1998

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Superintendent Brian O'Neill

GGNRA

Building 201, Fort Mason

San Francisco, CA 94123

RE: Fort Baker

Dear Mr. O'Neill,

We are responding to the Draft EIS and Proposed Plan for Fort Baker.

Draft EIS

We are particularly interested in plans for beach and coastal strand restoration: removing bulkheads, regrading to shallow slope, and revegetating the 6-acre beach and meadow. It is currently a degraded area of asphalt, bare ground, and non-native plants.

The EIS generally describes site improvements for this area as including a boardwalk, grassy meadow and picnic site; however, there are no specific plans given, except for a list of low-growing plants in Appendix B. A "picnic area" is listed, but not defined as to size or location, and appears to be in conflict with restoration of the "meadow" as coastal strand as briefly described in Section 4.2.4.5.

The "meadow" area, planted with coastal strand vegetation as proposed, could provide much improved wildlife habitat, especially in combination with the restored beach. It would be habitat for land species (sparrows, meadowlarks, killdeer) and also could be very useful habitat for water birds (sandpipers and other wading birds) which need upland areas for roosting and resting at high tide. This should be noted in the EIS, along with recommended measures for protection from dogs and people and from the various activities of the "picnic area" if that is to be located in the same general area.

Section 2.6.2 The boardwalk is listed in this section as mitigation. The document states the boardwalk would be constructed across the beach to buffer vegetation from increased foot traffic and minimize visitor disturbance. Again, measures for protection of the "meadow" habitat areas should also be included for protection from activities of the "picnic area" if this is nearby.

17-A

17-B

17-C

17-D

A nonprofit corporation founded in 1994 to preserve, protect and enhance the natural assets of Marin County for all people

Page 2

Section 2.2.6 This section notes that broom and other exotic species would be removed outside the historic landscape within identified restoration areas. We strongly support removal of broom, pampas grass, and other invasive exotics in all areas, whether in or out of the historic landscape or within restoration areas. These plants will continue to vigorously colonize new areas if any plants or seed sources remain.

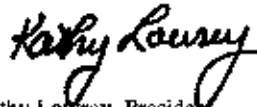
Figure 4-2 This figure shows Native Habitat Restoration Areas. If the "meadow" area is to be restored to coastal strand vegetation, it should also be included on this map.

17-E

Proposed Plan

The proposed plan for Fort Baker has exciting possibilities with its restoration plans for buildings and lands. The view across the parade ground to the Bay from the proposed conference center as shown on Figure 2-5 captures the spirit of future possibilities of this beautiful area. We look forward to further specific plans.

Sincerely,



Kathy Lowrey, President

JS

FORT BAKER

Final EIS

Letter 17. Kathy Lowrey, President, Marin Conservation League, November 5, 1998.

17-A

Figure 4-1 shows an elevation of the proposed beach concept. Figure 2-6 shows an illustration of the waterfront and coastal strand restoration areas. The waterfront treatment and beach restoration are described in Section 2.2.5 and Master Response #3 - Treatment of Waterfront.

17-B

The meadow/grassy area would be located upland from the proposed coastal strand area, and is intended to be used for passive recreation. Detailed design of picnic facilities would be done following implementation of the beach restoration/coastal strand project. The primary purpose of the “meadow” area is not to provide habitat restoration values (as is the case for the proposed Mission Blue Butterfly habitat areas). Rather, its primary purpose would be to provide open space for public enjoyment and to preserve important views between the historic Parade Ground and waterfront areas in a concept that is more sustainable and would require less overall maintenance and irrigation than a more traditional lawn.

17-C, D, E

Please refer to Response 17-B above and Master Response #3 – Treatment of Waterfront which address the issues raised in these comments.

National Parks and Conservation Association

PACIFIC REGIONAL OFFICE

KEAN HUSE
Regional Director

3 December 1998

Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

RE: FORT BAKER PLAN - DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear ^{Brian}~~Mr. O'Neill~~:

The National Parks and Conservation Association (NPCA) is pleased to respond with comments to the above referenced document. As you know, NPCA is the only private non-profit citizen organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. We have nearly 400,000 members nationwide, including more than 70,000 in California.

NPCA appreciates the effort that has gone into producing the Fort Baker Plan. Throughout the planning process, the National Park Service and Golden Gate National Park Association planners have done an admirable job of including the public and interested organizations in developing the plan. This work has resulted in an ambitious and worthy plan. NPCA generally supports the Proposed Action.

The emphasis on protecting the natural and cultural resources is the highlight of the plan. NPCA strongly supports the plans for restoration of the mission blue butterfly, oak woodlands, and coastal strand habitats. In addition, we believe that plans for the historic structures will ensure their restoration and continued preservation. As a whole, the Proposed Action has the potential to create a dynamic and engaging district with the Golden Gate National Recreation Area.

We are also pleased to see the retention of current park partners whose missions are consistent with park purposes. The Bay Area Discovery Museum and the U.S. Coast Guard have played an integral role in maintaining the site and in developing a viable plan. Finally, NPCA strongly



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supports the park's intention to convert the marina and boat shop to NPS managed public facilities. All efforts to retain preferential privileges at these facilities must be resisted as they will inhibit public access and could lead to similar requests for inappropriate uses.

NPCA is concerned with some apparent contradictions in the Proposed Action. First, the plan, when fully implemented, has the potential to attract many visitors to Fort Baker. The combination of lodging facilities, a popular museum, moorage for boats, and the spectacular open space may well create visitation levels which would undermine the important resource protection goals and habitat restoration plans. Fortunately, such conflicts can be anticipated through an analysis of the site's carrying capacity. Without such an analysis, the plan is fundamentally incomplete.

18-A

The plan also states an intention for the site to be financially sustainable. This emphasis on financial stability has the potential to undermine the Park Service's overarching mandate for resource preservation. Our concern for carrying capacity is relevant to this issue. For example, the level of overnight use necessary to generate revenue may, when added to day use visitation levels, lead to more people than the site can support. NPCA requests that these issues be addressed in the final plan.

18-B

In closing, NPCA is aware of the Navy's refusal to provide adequate maintenance on the historic structures pending transfer to NPS. Given the accelerating rate of damage the buildings are experiencing, NPS must do everything in its capacity to assure this issue is resolved and, therefore, avoid becoming responsible for the deferred maintenance. NPCA will gladly assist the Park Service in any way possible with this matter. Thank you again for the opportunity to comment on the Fort Baker Plan. Please keep us informed with any developments.

18-C

Sincerely,



FORT BAKER

Final EIS

Letter 18. Brian Huse, Regional Director, National Parks and Conservation Association, December 3, 1998.

18-A

Carrying capacity of Fort Baker was considered in several ways during the planning process. Based on the NPS Mission and objectives, several factors were considered including the visitor experience, sensitivity of the resource, and resource protection. Also considered in defining the carrying capacity were traffic impacts and the capacity established by parking resources allocated in the plan, with the goal to limit parking to previously disturbed and developed portions of the site. All elements of the plan were weighed against the objectives identified in DEIS Section 1.3. Resource protection and habitat restoration are addressed in the Proposed Action and in mitigations that have proved effective in other similar situations where recreational activities occur in proximity to important natural habitats.

18-B

Comment noted, thank you. “Financial sustainability” is one of several objectives of the Plan. Environmental sustainability, promoting the NPS mission, retaining and relating to the site’s special qualities, promoting public access, and minimizing environmental impacts are also objectives. (See Section 1.3 for a complete description of the Plan’s objectives.) Section 2.6 of the EIS describes the mitigation measures that have been incorporated into the Proposed Action by the NPS. These measures are focused on reducing the potential effects associated with the Proposed Action – the reuse and conversion of Fort Baker to a new unit of the National Park System. NPS is confident that meeting the objectives of the plan is possible within the framework of the Proposed Action, and will not compromise the NPS mission. Based on the concern expressed by the commentor, and other comments received on the Draft EIS, the Final EIS has been revised to include a mitigation measure that specifically addresses the size of the proposed retreat and conference center. Please refer to response to comment 7-G and Section 2.6.6 of the FEIS for a detailed explanation of this new measure.

18-C

See response to comment 15-B.



National Trust for Historic Preservation

November 30, 1998

Brian O'Neill
General Superintendent
GGNRA
Building 201
Fort Mason
San Francisco, CA 94123

RE: Draft Environmental Impact Statement, Fort Baker Plan, Golden Gate National
Recreation Area (GGNRA)

Dear Superintendent O'Neill:

The National Trust for Historic Preservation is pleased to submit our comments in support of the proposed plan for historic Fort Baker. We recognize the great opportunity and challenge to the GGNRA and Golden Gate National Parks Association (GGNPA) in planning for the conversion and reuse of historic Fort Baker.

The National Trust, chartered by Congress in 1949, is a private non-profit organization dedicated to protecting the irreplaceable. We fight to save historic buildings and the neighborhoods and landscapes they anchor. Through education and advocacy, the National Trust is revitalizing communities across the country and challenges citizens to create sensible plans for the future. The National Trust has 25,000 members in California and 270,000 nationwide. We have six regional offices, own 19 historic sites, and work with thousands of local community groups in all 50 states.

Fort Baker is listed as an historic district in the National Register of Historic Places due to its significance in the development of defense systems for San Francisco and the nation. Fifty-five structures associated with the site contribute to the National Register listing. Upon transfer of the site from the Army to the GGNRA, the park will be charged with maintaining and upgrading these facilities for public use. Many of the buildings on site are in serious need of repair. We believe that the conference and retreat center plan for Fort Baker achieves a solid balance between income generation as a means for rehabilitation and public use.

While the National Trust is supportive of the proposed plan for Fort Baker we would like to draw your attention to several suggestions. They are as follows:

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Use of the Conference and Retreat Center

The goal of creating an identity for the site that "strengthens the relationship of uses of the center's facilities to national park purposes" is stated on page 2-6. The National Trust applauds this concept and recommends that consideration of this concept be given when selecting users of the conference and retreat center in addition to programmatic interests so that they, too, may enhance that identity.

We understand that the maximum conference size of 350 rooms is based upon the financial requirements of the site. We trust that 350 rooms is the outside limit, and that the GGNRA and GGNPA will work to maintain a balance between the for profit use of the site and its park mission.

The National Trust strongly supports the proposal of making the conference and retreat center available to non-profit and other users at below market rates as noted on Page 2-11. Here, the concept is to offer the site to these users once sufficient income has been generated. We suggest consideration of additional alternatives which would include special off-season rates, last minute booking and the like.

Interpretation

We were pleased to see the emphasis given to interpretation of the site throughout the DEIS, and we cannot state strongly enough how important this is. We encourage the Bay Area Children's Discovery Museum to work with the GGNRA and GGNPA to coordinate site interpretation into their educational programs as well.

We would like to underscore the importance of a well-designed interpretive program for the batteries Cavallo, Yates and Duncan and their importance to the history of the site—particularly in light of the fact that the batteries may contribute to a coastal fortifications listing for the GGNRA as a National Historic Landmark district. In addition, we encourage the GGNRA and GGNPA to set a time frame for completion of the proposed multi-disciplinary plan for the "stabilization, preservation and interpretation" of Battery Cavallo (page 4-27).

19-A

Contributing Buildings Planned for Removal

A brief discussion of the buildings targeted for removal is found on Page 4-28. A fuller discussion of the rationale for demolition would be welcome here. How, for example, do the buildings hinder the meeting of park operational needs?

19-B

Maintenance of the Buildings During the Transition

In order for the plan for Fort Baker to be most effective, the buildings must be well maintained until they are turned over to the GGNRA. It is critical that the Army be a conscientious steward of the buildings during this transition period prior to the rehabilitation and reuse of the site. Ordinary maintenance measures such as clearance of gutters and down spouts,

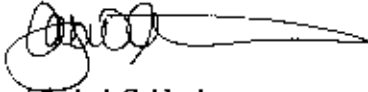
19-C

stabilizing building elements like porches and steps, regrading to prevent water seepage into buildings and turning on low levels of heat will better enable an effective revitalization of this important site.

19-D

Please do not hesitate to call on us if the National Trust can be of assistance in this planning effort.

Sincerely,



Elizabeth Goldstein
Regional Director
Western Office

cc: California Office of Historic Preservation
California Preservation Foundation
Fort Point and Presidio Historical Association

F O R T B A K E R

Final EIS

Letter 19. Elizabeth Goldstein, Regional Director, National Trust for Historic Preservation, November 30, 1998.

Comments noted. Thank you.

19-A

See Master Response #4 - Battery Cavallo.

19-B

Buildings slated for demolition are small utility structures and several garages. These building sites would be used for future parking, rehabilitation of the utility infrastructure or restoration of the waterfront and beach.

19-C

See response to comment 15-B.



December 3, 1998

Brian O'Neill, General Superintendent
Golden Gate National Recreation Area
Fort Mason Building 210
San Francisco CA 94123

Dear Superintendent O'Neill:

I am writing on behalf of the Natural Resources Defense Council (NRDC) to express our support for the proposed plan for Fort Baker, once it is transferred from the U.S. Army to the jurisdiction of the National Park Service. NRDC is a national nonprofit environmental advocacy organization with more than 400,000 members nationwide, some 80,000 of whom live in California. NRDC has a long-standing commitment to ensuring that the resources of America's public lands, including especially the resources of our parks, are protected and managed such that future generations will be able to enjoy them as we can today.

We welcome your plan to preserve Fort Baker's long history as a military installation as well as its outstanding natural and cultural resources. We support your commitment to restore the historic buildings on the base as well as the area's important habitats, including habitat for the endangered Mission Blue butterfly and healthy oak trees. And, we support your intention to remove much of the development along the waterfront. We look forward to the day when the Fort's buildings have been converted to appropriate non-military activities and native coastal strand and scrub communities have been restored along the waterfront.

Frankly, we wish that the U.S. Army would match the Park Service's commitment to protection of this unique area and its resources. We are dismayed by the fact that they have essentially abandoned the historic buildings of Fort Baker two years before it is to be transferred to the Park Service. Serious damage has already occurred to these historic structures, and conditions *will* become even worse if they do not assume their share of responsibility to protect these structures. Please count NRDC among the groups that support your efforts to convince the Army to change its position and to transfer this Fort in good repair.

20-A

Sincerely,

Johanna H. Wald
Senior Attorney
Director, Land Program

71 Stevenson Street
Suite 1825
San Francisco, CA 94105
415 777-0329
Fax 415 496-5996
www.nrdc.org

6210 Santa Monica Boulevard
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1200 New York Ave., N.W.
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Fax 212 277-1773

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F O R T B A K E R

Final EIS

**Letter 20. Johanna H. Wald, Senior Attorney, Natural Resources Defense Council,
December 3, 1998.**

20-A

Comment noted, thank you.

November 19, 1998

Mr. Brian O'Neill
Superintendent
National Park Service
Golden Gate National Recreation Area
Ft. Mason, Building 201
San Francisco, CA 94123

RE: Proposed Plan for Ft. Baker and Presidio Yacht Club

Dear General Superintendent O'Neill:

The Point Reyes Bird Observatory (PRBO) wishes to submit comment about the proposed plans to the Presidio Yacht Club at Ft. Baker. PRBO is a non-profit, biological research organization that works closely with many agencies including GGNRA, NPS, CENMS, and USFWS. For the last 30 years, PRBO has been able to protect and conserve the Farallon National Wildlife Refuge by maintaining a successful research station on the Farallones in cooperation with the U.S. Fish and Wildlife Service (USFWS). PRBO is dependent upon a group of dedicated Bay Area sailors known as the Farallon Patrol for transport to the islands. Since 1972, volunteers of the Farallon Patrol (approximately 25 Captains) have been providing safe and dependable transportation year round to and from our remote research station on the Farallones.

The Presidio Yacht Club and historic boat house at Horseshoe Bay have been an important resource to PRBO's Farallon Island Program. Many of our Farallon Patrol Captains utilize this facility before and after their journey through the Golden Gate to the islands. The docks allow the skippers and crew to load and unload critical equipment, supplies and food which are important to maintain our Farallon Island research station. Many of our Patrol skippers sail into Horseshoe Bay the night before a trip and have use of the docks and facilities. Volunteer researchers are able to stay overnight at the facility to ease early morning trip logistics. Our Farallon staff have space to leave important food and supplies at the boathouse that will be loaded onto these waiting vessels.

Page Two
Mr. Brian O'Neill
Superintendent

The trips to the Farallones are often cancelled mid-voyage due to the extreme weather experienced off central California. Horseshoe Bay is the closest "harbor of refuge" for our Farallon Patrol Captains. In such stormy conditions, due to the tides, currents and winds inside Horseshoe Bay, being tied to a mooring would not be considered safe.

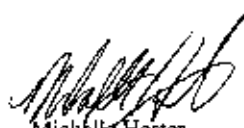
The idea of replacing the marina and docks with only moorings would eliminate this vital "staging area" to our operation. Those docks provide reliable and convenient access for the Farallon Patrol boats to exchange provisions and personnel. PRBO supports the Presidio Yacht Club organization in its endeavor to maintain this facility and to protect the marina.

In conclusion, PRBO respectfully urges you to adapt the preferred plan and keep the docks at Horseshoe Bay.


Sincerely,



Daniel Evans, Ph.D.
Executive Director



Michelle Hester
Farallon Biologist



Laura M. Williams
Farallon Patrol Coordinator



Kelly Hastings
Farallon Biologist

Arctic Alaska Antarctic Eastern Pacific Ocean All Western States Mexico Mono Lake
4790 SHORELINE HIGHWAY, STINSON BEACH, CA 94973-9701 TEL: (415) 568-1271 FAX (415) 568-1936
WEB: <http://www.prbo.org/prbo> EMAIL: prbo@prbo.org

21-A

F O R T B A K E R

Final EIS

**Letter 21. Daniel Evans, Laura Williams, Michelle Hester, Kelly Hastings, Point Reyes
Bird Observatory, November 19, 1998.**

21-A

Comment noted. The Proposed Action calls for a combination of docks and moorings. Docks would continue to be available for distressed vessels. Please refer to Master Response #6 – Preference for Docks over Moorings which further responds to this issue.

RICHARDSON BAY MARITIME ASSOCIATION

4 Loring Avenue, Mill Valley, Cal. 94941, Phone: 415-383-2279

Fort Baker Planning Team
Building 201 Fort Mason
San Francisco, CA 94123

12/4/98

Dear Sirs;

Having just had a chance to look over your Draft Environmental Impact Statement for the first time today, I write in haste to beat the 12/7 deadline as I read it. This letter is supplementary to a phone message I placed this afternoon at 561-4844.

Our association is recently formed to promote and publicize the maritime history, activities and traditions of Richardson Bay, and to serve as a public resource for maritime exhibits, learning and research activities. We are currently applying for our 501(c)(3) non-profit status, which we expect to receive in a month or so. The list of our Board of Directors and our Mission and Goals statement are attached.

Our specific interest is the historic boat shop, which we would like to see remain in the active form of a school to teach students maritime skills, such as boat-building and repair, which might dovetail with seamanship and sailing classes operated by the PYC. We have studied various facilities of this type, both here and on the east coast, and are very interested to establish a school to preserve the maritime skills that used to be so prevalent in Sausalito. We envision such a school being open to public viewing.

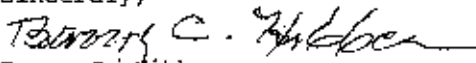
This afternoon I spent an hour introducing this idea to Mr. Dwayne McQuilliams, who told me the PYC had considerable interest in a school in the shop, but had been unable to come up with a plan; we are hoping to explore this in more detail with him next week.

It would seem to us to be a much better use for the historic boat shop than a snack bar.

If there are others to whom we should be communicating on this subject, I would be interested to explore further.

Thank you for your consideration,

Sincerely,


Barry C. Gibben
Chair, RBMA

22-A

F O R T B A K E R

Final EIS

Letter 22. Barry C. Hibben, Chair, Richardson Bay Maritime Association, December 4, 1998.

22-A

Maritime skills education could be compatible with the proposed use of the boat shop. NPS would be willing to consider this concept in the context of the overall program, which would also include other classes, exhibits, and interpretation.



December 4, 1998

Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123

Subject: Draft Environmental Impact Statement for Proposed Plan for Fort Baker

Dear Mr. O'Neill:

I am writing to submit comments on behalf of the San Francisco Bay Trail Project on the Draft Environmental Impact Statement (EIS) for the Proposed Plan for Fort Baker, dated October 1998. The Bay Trail Project is an organization administered by the Association of Bay Area Governments (ABAG) that coordinates implementation of the Bay Trail. When complete, the Bay Trail will be a continuous 400-mile network of bicycling and hiking paths that will encircle San Francisco and San Pablo bays in their entirety. It will link the shoreline of all nine Bay Area counties, passing through 47 cities, and will cross seven of the eight toll bridges in the region. To date, half the length of the proposed system has been developed.

As you know, the Bay Trail alignment traverses Fort Baker, an important segment that provides the connection between San Francisco and Marin County. After crossing the Golden Gate Bridge, the alignment connects to East Road under the bridge via Conzelman Road, with a separate trail tying into East Road along the shoreline from Lime Point. The Bay Trail continues on East Road to Horseshoe Bay, where it bifurcates. One route continues on East Road, eventually reaching South Alexander Avenue in Sausalito while the other roughly parallels Horseshoe Bay and Fort Baker's southeastern shoreline before it reconnects to East Road. Figure 3-7 of the Draft EIS, "Existing Fort Baker Layout," depicts this alignment, but the map is poorly reproduced and the legend is confusing. We request that the Final EIS include a more legible map of the Bay Trail alignment that omits transit service routes and that makes a clearer distinction between multi-use and hiking-only paths. (Enclosed for your reference are a full-color map of the Bay Trail alignment in Marin County and a copy of a more detailed in-house map of the area.)

23-A

Administered by the Association of Bay Area Governments
P.O. Box 2020 • Oakland, California 94604-0202
Joseph P. Ben Mabrouk • 101 Eighth Street • Oakland, California 94607-4756
Phone: 510-464-7925
Fax: 510-464-7970

We are delighted that the National Park Service is proposing numerous site-wide improvements to hiking trails and bicycle routes, including to the Bay Trail, as part of the Fort Baker Plan. We enthusiastically support the Park Service's efforts to promote public access and improve cycling and biking conditions at Fort Baker and are especially supportive of the following three proposals to improve the Bay Trail alignment:

- Providing an interpretive trail from Lime Rock to East Road along the waterfront.
- Converting Conzelman Road between the fishing pier and the west side of the Golden Gate Bridge to a route for pedestrians, bicyclists and emergency and service vehicles only.
- Re-striping East Road to reduce excess lane width in order to slow motor-vehicle traffic while providing safe space for hikers and cyclists.

In addition, we support downgrading to trail dimensions the one-way loop road between Battery Yates and Point Cavallo and providing a loop trail to Battery Duncan and the chapel. (These facilities are not on the Bay Trail alignment but will offer attractive spurs for users of the Bay Trail.) These improvements are a commendable way of balancing the Fort Baker Plan's objectives to minimize environmental impacts and promote public access.

An issue that concerns us is the future of the Bay Trail segment along Fort Baker's southeastern shoreline and around Battery Cavallo to East Road. (This segment is shown on Figure 3-7 as a dotted line and labeled a "Bike/Walking Path.") As shown on Figure 2-2b, the future trail will be shorter and farther from the waterfront. This is counter to two of the main Bay Trail policies: to separate as much of the trail as possible from roadways and to locate it as close to the shoreline as feasible. We request that the Final EIS address this conflict. We encourage you to retain the existing trail along the shoreline, and if this is not possible due to habitat restoration plans, to construct a separate multi-use path parallel to East Road. Ideally, this path would extend to Fort Baker's northern property limit, near South Alexander Avenue. It would be a highly attractive facility, providing hikers and cyclists with a long off-road segment without cross automobile traffic from intersections and driveways. We are happy to offer you technical assistance in developing this segment.

23-B

In closing, I again offer you our support and assistance in improving the Bay Trail through Fort Baker. The Bay Trail is a unique regional resource that will provide residents of southern Marin and the entire Bay Area with increased access to the outdoors and the shoreline, inexpensive recreation, exercise and sightseeing opportunities, and greater transportation options. Please call me at (510) 464-7915 if you would like to discuss further the comments in this letter.

Sincerely,



Niko Letunic
Bay Trail Planner

Enclosures

FORT BAKER

Final EIS

Letter 23. Niko Letunic, San Francisco Bay Trail, December 4, 1998.

23-A

Comment noted. The map (Figure 3-7) will be improved and the error in mapping the Bay Trail will be corrected. Every effort will be made to keep the Bay Trail through Fort Baker as close to the shoreline as possible.

23-B

The Bay trail alignment adjacent to Battery Cavallo was incorrectly shown in the DEIS Figure 3-7. The correct existing location was shown in Figure 2-2b. Figure 3-7 in the FEIS has been changed to show the correct alignment. Because of mission blue butterfly habitat and delicate earthworks of Battery Cavallo, it is not possible to locate this trail closer to the shoreline. The existing alignment was developed in consultation with the Bay Trail staff. Additional assistance during plan implementation is welcome.



**SAUSALITO
HISTORICAL
SOCIETY**

420 LITHO

MAILING ADDRESS

P.O. BOX 352

SAUSALITO

CA 94966

415.289.4117

December 7, 1998

TO: General Superintendent
CGNRA
Building 201
Ft. Mason, San Francisco 94123

FROM: Betsy Kraemer
Board Member/Archivist
Sausalito Historical Society

RE: Plan for E. Ft. Baker

As a local historian, I have been very interested in the future of E. Ft. Baker. All in all, I have been very impressed with the plan that has been generated by your staff. It is well-considered and appropriate to the area.

- As I have repeatedly noted in the discussion process, apart from wartime restrictions, the E. Ft. Baker and Sausalito areas have historically been treated as one area. Sausalito and E. Ft. Baker residents (from the Miwoks and beyond) have moved freely from one area to the other. In this context, I still have a few reservations about the plan as detailed or suggested.

1) I would not recommend closing Conzelman Road. Traffic flow in this area is already seriously constricted.

24-A

2) Instead of banning dog walking--or restricting it to designated areas, I would suggest the alternative of limiting it to time periods such as 6 AM - 9 AM and 5 PM - 7 PM.

24-B

3) I would give more than lip service and a little signage to the amazing history of southern Marin. A wonderful project would be to establish a museum housing your archives and those of the Sausalito Historical Society.

24-C

4) Last but not least, I hope that enough attention is given to wildlife habitat. Visitors in the 1800's reported that this Coast was teeming with everything from elk to oysters.

In closing I would note that I will be moving to Plumas County in May so none of my observations are self-serving

Again, I truly applaud the plan and the effort that is being made to use and preserve this historic site.

F O R T B A K E R

Final EIS

Letter 24. Betsy Kramer, Sausalito Historical Society, December 7, 1998.

24-A

See Master Response #1 - Conzelman Road Closure.

24-B

Dog walking would not be banned under the Proposed Action. Consultation with U.S. Fish and Wildlife Service could identify dog restrictions to protect mission blue butterfly habitat.

24-C

Park archives are located in the Presidio. Uses such as museum storage for others were addressed under the Office and Cultural Center alternative.



SIERRA CLUB MARIN GROUP

December 1, 1998

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Building 201, Port Mason
San Francisco, CA 94123

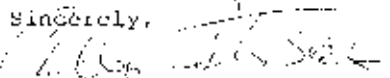
RE: DEIR FOR PORT BAKER PLAN

Dear Superintendent O'Neill:

The Sierra Club Marin Group requests that the following issues be addressed in the Final Environmental Impact Report.

- Restoration of historic salt marsh along the edge of Horseshoe Bay instead of the proposed dunes. 25-A
- How much dredging would have to occur and at what frequency with the proposed project? Where would the material be disposed? 25-B
- Provide a description of the location of the trails near the endangered species habitat? How close would they be? What measures would ensure trail users would not go off the trail into the habitat? 25-C

Thank you for addressing these issues.

Sincerely, 
Phillip Peterson, Co Chair
Conservation Committee

F O R T B A K E R

Final EIS

Letter 25. Phillip Peterson, Co Chair, Sierra Club Marin Group, December 1, 1998.

25-A

Comment noted. Please refer to Section 2.7.2 of the EIS that addresses this issue. Also, see the response to comments presented in Letter #16. Please note that the proposed beach restoration would use coastal strand habitat.

25-B

Please refer to Master Response #9 – Dredging.

25-C

The location of proposed trails is shown in Figure 2-2a and 2-2b of the EIS. The potential environmental effects of the trails have been analyzed and mitigation to reduce or avoid impacts identified. The commentor is referred to Sections 2.6.4 and 4.2.4.1 of the EIS for a discussion of these issues.

Author: Art Beckman <abeckman@sgi.com> at NP--INTERNET
Date: 12/6/98 8:19 PM
Priority: Normal
TO: FortBaker at NP-GOGA-GGNPA
Subject: NPS Plan for Fort Baker

----- Message Contents -----

This email is in response to the NPS's plan for reuse of Fort Baker as outlined in the Environmental Impact Statement. I am an Army reserve officer and joined the Presidio Yacht Club this Summer. I have been very impressed at the efforts of the Club to include Travis Air Force personnel in the Club. Much of the former use of the Presidio seemed rather of marginal benefit to the service as a whole.

The inclusion of this new contingent of personnel into the Club has a clear benefit to morale and welfare of the military. The Travis personnel that I have met are enthusiastic and committed members of the Club. The activity that I have observed each weekend would seem to justify the continued use by the military of the existing facilities. I understand that the Club has presented plans to incorporate usage of the facilities by both military and civilians to be more inclusive of the public.

The existing facilities are quite adequate for the types of use likely to be made of the area. Spending tax payer money to "improve" the facilities seems to be a waste of time and effort. The boathouse is, um, rustic, but has sufficient training, maintenance, office and dining capabilities. The docks and slips are being improved and are adequate for a marina. Spending money to tear them out and replace them with a less functional replacement again seems to be poor use of tax payer funds. Replacing slips with moorings seems particularly adverse to the Club and seems to offer little to recommend it based on anticipated usage.

Art

--

Arthur A. Beckman
voice: (650) 933-6169 fax: (650) 964-0811
email: abeckman@sgi.com
Storage and Bandwidth Solutions Line Manager
Server & Supercomputing Business Unit
Silicon Graphics, Inc., MS 8L-855, 2011 N. Shoreline Blvd.
Mountain View CA 94043-1389

26-A

F O R T B A K E R

Final EIS

Letter 26. Art Beckman, December 6, 1998.

26-A

Comments noted. Please refer to Master Response #6 – Preference for Docks over Moorings and Master Response #7 – Preference for Retaining PYC/Travis AFB.

Author: "glenn billingsley" <summrblu@concentric.net> at NP--INTERNET
Date: 12/3/98 3:13 PM
Priority: Normal
TO: FortBaker at NP-GOGA-GGNPA
Subject: Fort Baker and Horseshoe Bay

----- Message Contents -----

Dear Sir/Madam:

I encourage you to retain the marina versus a public mooring. the marina can provide a source of constant revenue that open moorings cannot. I do not see a sea of moorings generating significant revenue. My position is based on my belief that any recreational activity should be sponsored by its users and not by the government.

27-A

As for your relationship with the Presidio Yacht Club, I believe the PYC can provide significant contributions to the Park Service efforts. I would not have been able to purchase a boat and keep it if it were not for the training and experience I gained from my association and membership with the PYC. Because of my positive experience, I offer that the PYC can provide many services that will enhance the goals of the Park Service. I do encourage you to work to make this happen.

27-B

Sincerely,

glenn billingsley

F O R T B A K E R

Final EIS

Letter 27. Glenn Billingsly, December 3, 1998.

27-A

Comment noted. Please refer to Master Response #6 – Preference for Docks over Moorings.

27-B

Comment noted. Please refer to Master Response #7 – Preference for Retaining PYC/Travis AFB.

Frederick Bold, Jr.
1201 California Street
San Francisco, California 94109
Telephone: (415) 474-2206

November 12, 1998

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Building 201
Fort Mason
San Francisco, CA 94123

Comment on Draft EIS for Fort Baker Plan

Dear Mr. McNeill:

These comments relate to the plan for the marina in the Proposed Action Plan and the General Management Plan in the October 1998 draft Fort Baker EIS.

I have actively sailed on San Francisco Bay for 50 years, the last 20 of which have been out of the marina at Horseshoe Bay. Based on this experience I respectfully submit that the proposed removal of the existing marina at Fort Baker is extremely ill-advised. This drastic action would not only have serious adverse impacts, it is completely unnecessary, expensive and would not to any extent enhance recreational use of Fort Baker or promote visitor safety and enjoyment.

The entire discussion in the EIS of the Proposed Plan for the Marina is the following: "Deteriorated dock and slips would be replaced to provide for day use and short-term/overnight use. A combination of mooring buoys and slips with dock access would accommodate up to 60 boats. (Approximately 70% of the spaces would be provided as mooring buoys and 30% as slips with dock access)" [page 2-14]. This means the moorings would accommodate 42 boats and slips would be provided for only 18 boats. However at page 12-14 there is added "Several slips accessed from the dock would be provided for Coast Guard use as temporary mooring for rescued disabled boats and for other program related boats." Thus a marina that now provides permanent berths for 70 yachts plus ample docks for guests and Coast Guard emergency use would be replaced by accommodations for 18 "less several" slips and a lot of moorings.

The EIS for the proposed use of the marina for moorings reflects a complete unawareness of boating on San Francisco Bay. Moorings are not used extensively by local boaters because they are a nuisance and unsafe. They use docks and slips or they anchor out. For example the moorings at the Sausalito Yacht Club are seldom used; the Presidio Yacht Club has from time to time maintained a single mooring in Horseshoe Bay which was very seldom used. It has only been on rare occasions that any boats (never more than one or two) have anchored overnight in the harbor. Moorings in the Bay have recently been removed from the southeast side of Angel Island

28-A

and from the cove south of the Ferry Building. People taking their boats to any destination in San Francisco Bay want to go ashore when they get there. Compared to docks and slips moorings are hazardous and a nuisance requiring the preparation, boarding, handling and disembarking of a dingy or shore boat.

Horseshoe Bay will not accommodate 42 moorings. Leaving space for the Coast Guard, access to the marina and ramps for outriggers, surfers and kayaks, there isn't room in the bay for more than 10 moorings. The winds and currents in the bay require a circle of space around each mooring to prevent collisions. The diameter of the circle would have to be at least twice the scope of the buoy's anchor line (to prevent it from submerging in high water) plus the mooring line of the boat and the length of the boat. To be safe moorings should not be closer than approximately 115 feet.

28-A

The existing marina has enough guest-dock space for visitors. Other yacht clubs and groups frequently cruise in to Presidio Yacht Club and never has a visitor been denied space at a guest dock or slip.

The need in Horseshoe Bay is for permanent berths, not accommodations for overnight visitors on week ends. Horseshoe Bay is indeed a beautiful spot but it does have considerable wind, tidal current and cold weather. As a cruise destination it can't compare with Ayala Cove, Paradise Cove, Clipper Cove, or almost any other harbor in the Bay. That is why there are relatively few visitors, not the lack of moorings.

28-B

The existing Marina is wholly compatible with the park and its mission. It provides safe and convenient marine access to the park for visitors, and there are ample public facilities for charter boats and sailing instruction. It can be maintained safely by volunteers and be a source of substantial income.

28-C

I join with many other urging you to rescind the proposal to remove the marina.

Yours very truly,


Frederick Bold, Jr.

F O R T B A K E R

Final EIS

Letter 28. Frederick Bold, Jr., November 12, 1998.

28-A and 28-B

Comments noted. Please refer to Master Response #6 – Preference for Docks over Moorings.

28-C

Comment noted. Please refer to Master Response #7 – Preference for Retaining PYC/Travis AFB.

11/1/98

General Superintendent, GGNRA
Fort Mason, Building 201
San Francisco, CA 94123

Dear Sir/Madam,

I have recently reviewed the present plan for the Fort Baker addition to the Golden Gate National Recreation Area. I was happy to see that the existing boat ramp that is in front of the Coast Guard station is slated to remain. However, if I have read the intended plan correctly, it seems that the adjacent parking, that is necessary for the practical use of that ramp, is to be eliminated. Having a boat ramp with no place to park the tow vehicle and empty trailer while the vessel is being operated out in the bay or ocean is poor planning. The city of Sausalito now has this situation, and they might as well remove the ramp since it receives little use. (No doubt eventual removal is their ultimate goal in eliminating all boat trailer parking anywhere near the ramp). If we are going to have a boat ramp, and I think it is definitely something good to have there, then we need to go the whole ten yards and have adequate and close parking. If having the parking near the existing ramp is not possible, then what about creating a new ramp over near the proposed marina where there is parking presently planned?

29-A

In addition, any boat launch ramp is greatly enhanced by having a temporary tie up dock along one side of the ramp. If the launch facility at the new Fort Baker is to be first class, then a dock needs to be added to the ramp, wherever the ramp eventually is.

29-B

I hope you will give this serious consideration. It would be too bad to put a lot of work and money into this conversion and not quite get it right.

Sincerely,


B.H. Bolt

F O R T B A K E R

Final EIS

Letter 29. B.H. Bolt, November 1, 1998.

29-A

Comment noted, thank you. Under the Proposed Action, the boat ramp would remain. The DEIS acknowledges that parking for the ramp would be less convenient than under existing conditions (4.2.11.1), but would be accommodated within reasonable distance of the ramp. NPS believes that tradeoffs required to achieve restoration of the beach are acceptable and benefit the park and the resource to the greatest extent.

Author: Rick Boyce <boyce@Adobe.COM> at NP--INTERNET
Date: 11/17/98 2:20 PM
Priority: Normal
TO: FortBaker at NP-GGGA-GGWA
CC: boyce@Adobe.COM at NP--INTERNET
Subject: Plan for Re-use of Fort Baker

----- Message Contents -----

November 16, 1998

Dear Superintendent O'Neill,

I have read the proposed plan of the National Park Service for the re-use of Fort Baker, and I find many of the plan's provisions interesting and exciting. I'd like to draw attention though, to several that I believe to be problematic.

I am a member of the Farallon Patrol, a volunteer group of boat owners that for the last 25 years has been committed to supporting the Point Reyes Bird Observatory (PRBO), the non-profit organization commissioned by the U.S. Fish and Wildlife Service to pursue wildlife research at the Farallon Islands. We do this by transporting people and supplies for PRBO to and from the islands on a biweekly schedule. Because of its key location just inside the Golden Gate on the Marin County side, Horseshoe Bay is by far the most natural staging area for our work. The Presidio Yacht Club has placed its docks and other facilities there at our disposal on a continuing basis for many years.

My concerns:

1. If the docks are removed from the Presidio Yacht Club site in Horseshoe Bay, we will no longer be able to ship people and supplies there. The nearest alternatives would require a much longer drive for the PRBO people, who come from Marin County, or a much longer passage for the boats.

2. The ingredient that has made our activities at Horseshoe Bay run so smoothly over the years has been the Presidio Yacht Club. Its people have invited us to use their facilities, held space for us at their docks on Farallon "boat days" and gotten involved directly in helping us do our work. In essence they are a service organization with a commitment to the PRBO mission at the Farallon Islands. We cannot replace them, so their departure from Horseshoe Bay would be a serious setback for us.

3. If the retaining wall along the north shore of Horseshoe Bay is removed and replaced by a beach, the inevitable wave and tidal action will cause continual shoaling in the bay and make it much smaller than it is now as a haven for boats. I believe that this scenario should be studied carefully before the plan for a beach is implemented.

4. The Park Service plan envisions an array of mooring buoys anchored inside Horseshoe Bay for the use of the boating public. But the sea bottom in the bay is of very soft mud, so the holding ground is poor. We know from long experience there that our anchor is susceptible to dragging in anything over a moderate breeze. Particularly in winter with strong southerly winds driving seas into the bay, it is likely that a buoy with a boat moored to it will drag its anchor toward shore. I believe that this scenario too should be studied before any implementation begins.

I hope that these comments/suggestions are helpful, and that they are given due consideration. Your decisions on these matters will be a significant factor in our future work.

30-A

30-B

30-C

FORT BAKER

Final EIS

Letter 30. Rick Boyce, Farallon Patrol, November 16, 1998.

30-A

Comments noted. The Proposed Action calls for the provision of docks and moorings. Please refer to Master Response #6 – Preference for Docks over Moorings for additional information on this subject.

30-B

Preliminary studies indicate that removal of the wooden bulkhead will not increase shoaling. Final design of the waterfront will address beach stability including beach material and geometry.

30-C

Comment noted. Future design of layout, number and location of docks and moorings will consider these factors.