FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Fort Mason Center Long-term Lease National Park Service, U.S. Department of the Interior Golden Gate National Recreation Area

INTRODUCTION

Located in northern San Francisco on the San Francisco Bay, Fort Mason is part of the San Francisco Port of Embarkation National Historic Landmark District, historically serving as a major point of embarkation for American troops. In 1972, the U.S. Army transferred responsibility for its maintenance, restoration, and use of the long-time military base to the National Park Service (NPS) as part of the Golden Gate National Recreation Area (GGNRA). By 1975, it became apparent that the unoccupied structures of Fort Mason were subject to vandalism and deterioration and the GGNRA lacked the funds and expertise to restore and develop Fort Mason to meet the standards required by the National Historic Preservation Act (NHPA) of 1966.

At the same time, nonprofit groups expressed an interest in moving to the lower part of Fort Mason, and the Fort Mason Foundation (FMF), a private nonprofit organization, was created by San Francisco civic and business leaders to negotiate with the NPS on behalf of the nonprofit community. A cooperative agreement was entered into by the NPS and the FMF, whereby the NPS provides the buildings rent-free and the FMF renovates and maintains the area, as well as develops and administers the Fort Mason Center (FMC) at the lower part of Fort Mason. In addition, FMF committed to provide cultural, recreational, and educational programs to the public at minimum or no cost in accordance with NPS's GGNRA General Management Plan. Since that time, FMC has supported a diverse range of nonprofit organizations that focus on the visual and performing arts, humanities, education, ecology, and recreation. FMC houses nearly 40 nonprofit organizations and is the setting for more than 15,000 meetings, conferences, performances, and special events attended by 1.6 million visitors each year.

The original agreement between the NPS and FMF expired in 1984 and was replaced by another agreement that expires in 2004. In order to maintain FMC's cultural, recreational, and educational focus and to protect the integrity of FMC as part of the San Francisco Port of Embarkation National Historic Landmark District, the GGNRA obtained authorization to negotiate a long-term lease for up to 60 years with the FMF based upon its record of success. FMF and NPS have prepared an environmental assessment (EA) that evaluates the potential environmental effects of the Fort Mason Center long-term lease.

Purpose of Action

The purpose of the proposed action is to allow the continued operation of the FMC to meet the objectives identified in FMF's mission statement and the 1980 General Management Plan prepared by the NPS for the GGNRA: to create and preserve a cultural, educational, and recreational center, which reflects the unique history, talents, and interests of the people of the Bay Area in partnership with the National Park Service.

Need for Action

Absent the proposed long-term lease, the responsibility for seismic upgrading of the buildings, utility improvements, historic preservation, and restoration of the building exteriors will continue to reside with the NPS. The NPS, due to other priorities and funding limitations, cannot devote the funding or resources necessary to ensure that needed projects for the long-term maintenance and upkeep of FMC are undertaken. The NPS seeks to enter into a lease with FMF to ensure that:

The existing historic structures are restored, preserved and maintained for visitors;

The National Historic Landmark District retains its integrity;

The partnership with the FMF is maintained; and

The visitor experience and recreational, educational, and cultural programs envisioned in its General Management Plan are continued and expanded.

ALTERNATIVES EVALUATION

The NPS and FMF evaluated two project alternatives:

Extension of the existing cooperative agreement only (the No Action Alternative); and

Entering into a new long-term lease for up to 60 years (the Selected Alternative).

NPS and FMF considered three additional alternatives, but dismissed these from further consideration. Proposals for a new cooperative agreement, lease negotiations between NPS and organizations other than FMF, and development of a new park at an alternative site were dismissed from further consideration due to infeasibility or failure to meet project objectives.

No Action Alternative

Under the No Action Alternative, the responsibilities for maintenance, upkeep, and rehabilitation between the NPS and FMF would remain unchanged. NPS would remain responsible for the maintenance and upkeep of historic structures at FMC. As previously mentioned, given the limited budget for activities at Fort Mason, it is not anticipated that NPS would be able to adequately maintain or restore the historic buildings.

Selected Alternative

The Preferred Alternative presented in the EA and the Selected Alternative are the same, without changes or modifications. Under the Selected Alternative, the FMF would continue to manage FMC as it has since 1977. However, the lease term would be longer than the current cooperative agreement, which was for 20 years, and would shift some responsibilities from the NPS to FMF. Most notably, the long-term lease would shift responsibility for parking management and full building maintenance, excluding the substructures of the piers and Building E, from the NPS to FMF and allow FMF to renovate and use Pier One. The seawall/retaining wall is managed as a contributing element to the San Francisco Port of Embarkation National Historic Landmark District, regardless of the outcome of lease negotiations. The final lease term will be determined in the lease negotiation between NPS and FMF and is subject to the approval of NPS' Regional Director. The NPS will announce the signing of the lease, including lease

duration, at the next regularly scheduled GGNRA public meeting following the signing of the lease. The item will be included as part of the Superintendent's report to the public.

The long-term lease would allow FMF to continue operating the FMC and to invest in needed facilities, enable FMF to undertake financing and fund raising, allow the use of Pier One for programs and activities, and ensure that the National Historic Landmark District is protected through the ongoing use and rehabilitation of the structures. More specifically, a long-term lease makes it possible for the FMF to more effectively fundraise in the philanthropic community and borrow money from lending institutions since the lease can be used as an assurance and incentive for donors and as collateral for those providing financial backing. Currently, under the cooperative agreement, the NPS can withdraw the right of FMF to use the FMC buildings at any time. While this is highly unlikely, given the lengthy and positive partnership, it does create a level of uncertainty and would be an unacceptable condition for financial institutions and undesirable for philanthropic entities.

Implementation of the long-term lease agreement makes more feasible the funding of seismic upgrades, building restoration, and utility upgrades identified in a 1999 Campus Assessment. The impacts of these projects were not evaluated in the EA and will be subject to additional environmental analysis. Specific projects that have been identified as a priority when funding becomes available include:

Restoration and rehabilitation of the Pier Two substructure (underway in spring 2003)

Restoration and rehabilitation of the Pier Two shed

Seismic retrofit and structural repair of the substructures of Piers One and Three

Rehabilitation of the Pier One shed

Rehabilitation of the Pier Three shed

Seismic retrofit of Buildings A through D, the Gatehouse, and Guardhouse

Implementation of new facilities standards for interior and exterior improvements

Utility infrastructure upgrading

Implementation of parking management

Ongoing upgrading of venues and resident spaces

In addition to the long-term lease, the Selected Alternative proposes changes to the way that site improvements are reviewed for potential effects on the National Historic Landmark District. Existing regulations and processes established to preserve the historic integrity of the FMC include Section 106 of the National Historic Preservation Act (NHPA), the Secretary of the Interior's Standards for Rehabilitation, and the GGNRA 1992 Section 106 Programmatic Agreement. The 1992 Section 106 Programmatic Agreement lists categorically excluded undertakings that can be reviewed locally by Golden Gate historic preservation professionals without going through full Section 106 (NHPA) consultation. While these Categorical Exclusions provide a broad range of undertakings that can be reviewed internally, they do not provide clear distinction between low impact activities and more complicated rehabilitation efforts. Activities within the Categorical Exclusions of the Section 106 Programmatic Agreement are subject to the same review processes. The Selected Alternative includes streamlining the Section 106

review process under a new Section 106 Programmatic Agreement that would divide undertakings at FMC into three classes:

- 1. Routine, repetitive, or minor maintenance activities, such as repainting the same color, replacing a broken window or graffiti removal
- 2. Occasional more invasive maintenance repair and rehabilitation activities, such as structural stabilization and other rehabilitation for interior tenant improvements
- 3. Major repair and rehabilitation projects, such as seismic upgrades that might include adverse effects or rehabilitation for adaptive use of Pier One

Under the new Section 106 Programmatic Agreement, the first class of activities would require subject matter input from a Golden Gate historic preservation professional on an annual workplan, approved standards, or other program level review but would no longer require the individual, in-park review. The second class, depending on the extent of the maintenance activity, may be subject to the 5X review. The third class of undertakings that have the potential for adverse effects as defined by Section 106 would require additional consultation with the State Historic Preservation Office and the Advisory Council on Historic Preservation and other interested parties at specific points in the project design process.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Definition

The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (Section 101(b)). This alternative would:

Fulfill the responsibilities of each generation as the trustee of the environment for succeeding generations;

Ensure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

Attain the widest range of beneficial uses to the environment without degradation, risk of health or safety, or other undesirable or unintended consequences;

Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;

Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and

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

The NEPA Council on Environmental Quality explains that the environmentally preferred alternative is "the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." According to the NPS NEPA Handbook (DO 12), through identification of the environmentally preferable alternative, the NPS decision-makers and the public are clearly faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in

reaching final decisions. The NPS may also consider the No Action Alternative in identifying the environmentally preferred alternative.

Identification of Environmentally Preferred Alternative

The Selected Alternative is the Environmentally Preferred Alternative. The No Action Alternative would allow limited construction activities at FMC based on its revenues, funds that FMF could raise through grants and other contributions and resources provided by the NPS. Construction-related impacts could occur but are expected to be limited as reported in Chapter 4 of the EA. Historic structures would continue to deteriorate, absent a funding mechanism to remedy deferred maintenance or undertake seismic retrofits. Already some structures are vulnerable, and continued deterioration could make restoration difficult or impossible. The Selected Alternative, by contrast, is more likely to maintain the integrity of the San Francisco Port of Embarkation National Historic Landmark District for the future, by facilitating rehabilitation at FMC including the seismic upgrade of Pier One, the maintenance of historic structures, and utility upgrades. The Selected Alternative would rehabilitate important components of the historic landmark district as well as increase waterfront recreational, educational, and cultural opportunities. The 1980 General Management Plan called for the restoration of the pier sheds to display the cultural diversity of the San Francisco Bay Area's communities, educate the public about the San Francisco Bay marine ecology, and house large special events and community organizations. The Selected Alternative would better achieve the objective of permitting high standards of living and a wide sharing of life's amenities. Based on the NPS NEPA Guidelines, and the policies and principles of Section 101 of NEPA, the Selected Alternative is identified as the environmentally preferred alternative. The Selected Alternative would attain the widest range of beneficial uses of the environment, including historic preservation and visitor experience, without long-term degradation of resources. In addition, it would preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choices."

PUBLIC INVOLVEMENT

FMF, in partnership with the NPS, sought to obtain input from the public, other agencies, and environmental organizations throughout the environmental review process. On March 1, 2003, the NPS sent a scoping notice announcing its intention to prepare an EA for the Fort Mason Center Long-Term Lease and to hold a public scoping meeting to determine the scope of impact topics and alternatives to be addressed in the EA (see Appendix A of the EA). The public meeting, held on March 18, 2003, introduced the proposal and invited comments on the planning and environmental review process. Interested parties were encouraged to provide comment on the project through April 16, 2003. Two members of the public spoke at the scoping meeting in favor of the lease. In addition, two written comments, both from resident organizations of the FMF, were received. Without specifically mentioning the lease, one letter opposed implementation of paid parking at the FMC for both visitors and staff, and a second letter fully supported the Fort Mason Center Long-Term Lease.

NPS staff conducted internal scoping to identify and evaluate potential impacts from the Selected Alternative. The project was presented to the GGNRA Project Review Committee on three occasions to solicit comments and identify impacts.

CONSULTATION

Prior to preparation of the EA, the FMF and NPS sent out eight agency consultation letters to solicit comments regarding the proposed action (see Appendix B of the EA). The agencies were then contacted via telephone to ensure that the letters had been received and to answer questions from agency staff. Agencies were requested to provide written comment by May 24, 2003, and these comments were reflected in the EA. Comment letters were received from the California Department of Fish and Game (CDFG) on May 23, 2003; U.S. Fish and Wildlife Service (FWS) on May 16, 2003; and San Francisco Bay Conservation and Development Commission (BCDC) on June 9, 2003. The comments focused on three topics: (1) consistency of the project with the *San Francisco Bay Plan*, McAteer-Petris Act, and other applicable regulations; (2) effects of the project, namely, potential seismic retrofit of Piers One and Three, on San Francisco Bay water quality; and (3) effects of the project, namely seismic retrofit of Piers One and Three, on marine life in the project vicinity. Other agencies contacted included the San Francisco Regional Water Quality Control Board, California Department of Boating and Waterways, California Coastal Commission, California State Historic Preservation Office, National Marine Fisheries Service, and U.S. Army Corps of Engineers. These agencies did not provide written comment on the EA.

Approximately 140 copies of the EA were mailed to appropriate agencies and interested parties during the public review period (see Appendix C of the EA). Five comment letters on the project were received during the public review period. Letters were received from the San Francisco BCDC (requesting a consistency determination), San Francisco Municipal Railway (providing editorial corrections regarding transit terminology and MUNI transit line descriptions), the State Clearinghouse (no comment), California Department of Transportation (no comment), and Performing Arts Workshop (indicating support for the long-term lease). Alma Robinson, President of the Fort Mason Center Resident Organizations, spoke at the public meeting in favor of the proposed lease but was concerned about the effects of paid parking. In addition to the above efforts to solicit public input, the NPS and the FMF met with the San Francisco BCDC on August 28, 2003. The intent of the meeting was to present the purpose and need for the proposed long-term lease, consistency with BCDC's Bay Plan, and to discuss BCDC's interests. BCDC's preliminary comments received at the meeting were incorporated into their comment letter on the EA. The NPS submitted a consistency determination for the project on October 28, 2003 and requested that the BCDC concur that the proposed project is consistent with the Commission's Amended Management Program for the San Francisco Bay segment of the California coastal zone. On February 10, 2004, BCDC sent the NPS a letter of conditional concurrence for this consistency determination. The Letter of Concurrence contains conditions requiring the NPS to: 1) submit a copy of the final lease agreement with the FMF for Commission staff review for consistency with the lease described in the environmental document and with the consistency determination submitted on October 28, 2003; 2) submit to, and receive approval from, the Commission on a consistency determination for the seismic retrofit of the Pier One substructure and pile-supported pier; 3) maintain public access on all pier aprons during daylight hours; and 4) submit a parking traffic plan to Commission staff for review and comment, and if determined necessary by or on behalf of the Commission, submit a consistency determination for the parking plan. The NPS accepts the conditions listed in the consistency determination and will incorporate them into the project.

PUBLIC REVIEW

The EA was circulated for public review on August 8, 2003 and the public review period for the EA closed on September 22, 2003. Notice of the EA availability and the EA were posted on the National Park Service (NPS) website at http://www.nps.gov/goga/admin/planning/foma-ea.htm and approximately 1,300 mailers were distributed to public agencies, interest groups, organizations and individuals associated with NPS, to announce a public meeting to receive public comments. Approximately 140 copies of the EA were distributed to agencies and individuals. The EA was also sent to the San Francisco Public Library and the J. Paul Leonard Library at San Francisco State University. A public meeting to discuss the EA and accept public comment was held on September 9, 2003. As previously mentioned, in addition to the comments made at the public meeting, five comment letters on the project were received during the public review period.

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

Impacts that may be both Beneficial and Adverse

The Selected Alternative would have effects during construction. Construction projects, such as renovation of Pier One, retrofit of Piers One and Pier Three substructures, and seismic upgrades of other buildings, could disturb air quality, water quality, aquatic life, benthic habitat, historic resources, scenic resources, transportation, hazardous substances, visitor use and experience, and resident organizations and businesses. Moreover, increased activities and events under the Selected Alternative could increase parking and noise impacts on the neighboring Marina District. The intensity and duration of these adverse effects would be mitigated by measures identified previously under "Mitigation Measures." In addition, mitigation measures included in the Pier 2 EA and permit conditions for the Pier Two seismic retrofit may be applicable to the retrofit of Piers One and Three. If the construction method or techniques for the retrofit of Piers One and Three differ substantially from the Pier Two work, such that these measures may not afford the same assurance of reducing adverse effects, then additional NEPA documentation and measures may be warranted.

The Selected Alternative would also have long-term, moderate beneficial effects on the human environment. These beneficial effects include improving public safety (by strengthening Piers One and Three and other FMC structures to resist lateral forces in an earthquake); enhancing visitor experience (by opening Pier One which would create more waterfront recreation venues); preserving the historic integrity of the site (by raising funds to help finance building code compliance and remedy deferred maintenance); and improving vehicular circulation and access (by creating a funding mechanism to finance transportation improvements).

Degree of Effect on Public Health and Safety

The Selected Alternative would have a positive effect on public health and safety, by increasing the likelihood of retrofitting the substructures of Piers One and Three and other FMC structures to withstand the effects of an earthquake. In addition, the entrance area to FMC is complex and can be confusing to motorists unfamiliar with the site. Site lighting, pavement markings, and channelization of the parking lots

are needed to improve circulation and public safety. These circulation and safety recommendations are contained in a Wayfinding and Signage Program commissioned by FMF, but the lack of funds precludes or delays implementation of these recommendations. The Selected Alternative creates a fundraising mechanism that increases the likelihood for these improvements, resulting in a further beneficial public health and safety effect.

Unique Characteristics of the Geographic Area such as Proximity to Historic or Cultural Resources, Park Lands, Prime Farmlands, Wetlands, Wild and Scenic Rivers, or Ecologically Critical Areas

The geographic area of the proposed action, the FMC, and its broader geographic context, the San Francisco Bay, possess a variety of unique characteristics:

The FMC is part of the San Francisco Port of Embarkation National Historic Landmark District; San Francisco Bay supports special-status species and important commercial species; and The FMC is part of the GGNRA.

The Selected Alternative would not diminish the integrity of the National Historic Landmark District, because it provides for improvements that are designed to minimize harm and ensure that the historic integrity is maintained. In addition, the new Section 106 Programmatic Agreement would define specific review timeframes by the historic resource agencies to better ensure historic preservation of the structures, particularly those needing more extensive repair.

As described in the EA, special-status species, their habitat, and Essential Fish Habitat occur in the vicinity of the FMC. At such time as the Piers One and Three substructures may undergo retrofit, the NPS would consult the National Marine Fisheries Service, in compliance with Section 7 of the Endangered Species Act, regarding the proposed action's potential to affect threatened or endangered species, their habitat, or areas designated as Essential Fish Habitat. The conditions specified by the National Marine Fisheries Service as a result of future consultation, as well as specific measures to avoid herring spawning season and to restrict pile driving activities, presented as mitigation measures in the EA, would serve to reduce potential impacts to water quality and marine life to less than significant.

The FMC is a cultural, recreational, and educational facility within the larger GGNRA. By creating a better mechanism for fundraising and financing, the Selected Alternative would enable improvements to be made that would enhance visitor experience. In particular, the Selected Alternative provides for the restoration of Pier One, which would increase the amount of space available for events and community organizations, and increases the likelihood that recommendations in the Wayfinding and Signage Program, which includes an interpretive program element. Both of these changes at the site would enhance the recreational and educational experience for visitors.

Degree to which Effects on the Quality of the Human Environment are Likely to be Highly Controversial

Efforts were made during the scoping and review period to include interested individuals and agencies potentially affected by the project. At a scoping meeting held on March 18, 2003, two individuals spoke

and two letters were received. In addition, NPS sent letters to eight state and federal agencies with jurisdiction over resources that could be affected by the project alternatives. The EA was circulated for public review, with notice of the EA availability posted on the NPS website and about 1,300 mailers distributed to public agencies, interest groups, organizations and individuals associated with the GGNRA, to announce a public meeting to receive public comments. The public meeting for the project was held on September 9, 2003 at the Fort Mason Center. In addition to the comments made at the public meeting, five comment letters on the project were received during the public review period.

Public and agency interest was focused on parking, consistency with the Coastal Zone Management Act, and support for the project. The two primary issues of concern raised are the potential implementation of paid parking at the FMC and the San Francisco Bay Conservation and Development Commission's (BCDC) request for a consistency determination of the proposed action with the state McAteer-Petris Act and the BCDC San Francisco Bay Plan. The NPS and FMF are working with concerned parties to facilitate resolution of the issues. Other comments received at the scoping meeting and during the public review period indicated a support for the long-term lease. Comments did not indicate that effects were controversial.

Plans for implementation of parking fees at FMC have not been finalized and, as stated in the EA and the Transportation Demand Management Plan (Appendix D of the EA), there are many options for structuring a paid parking program and there are options to accommodate short-term visitors and employees without substantially affecting parking supply in the neighboring Marina District. The FMF has stated that plans for imposition of parking fees would not be finalized without further discussions with FMC residents. With respect to the BCDC's request, NPS and FMF have met with the BCDC to discuss the proposed long-term lease and a consistency determination was prepared by the NPS and submitted to BCDC on October 23, 2003.

Degree to which the Possible Effects on the Quality of the Human Environment are Highly Uncertain or Involve Unique or Unknown Risks

The EA identifies the Purpose and Need of the Selected Alternative as enabling the continued viable operation of the FMC for future generations. Over the past 25 years, FMF, in partnership with the NPS, has built an acclaimed recreational and cultural center. A long-term lease would afford FMF a better opportunity to generate revenues, incur debt, and fundraise to preserve, maintain, and operate the Historic Landmark District. The Selected Alternative, thus, provides the NPS and FMF a clear understanding of the future of FMC. Rather than introducing highly uncertain unique or unknown risks, the Selected Alternative would allow greater stability at FMC. Consequently, risks of building failure, spills from ruptured utility lines, pier collapse, and impairment of visitor experience are reduced by the Selected Alternative.

The Selected Alternative increases the likelihood that improvements identified in the 1999 Campus Assessment for FMC will be funded. The EA makes reasonable assumptions about these improvements in order to fully disclose the potential effects. For example, the seismic retrofit for Piers One and Three has been not been designed. The EA states that if the construction method is similar to that currently

being used to retrofit Pier Two, then the nature of impacts and the types of impacts and permit conditions would be comparable to those described in the Pier 2 EA. The Long-Term Lease EA acknowledges that if NPS determines that the renovation of Piers One and Three would be undertaken in a substantially different manner from the Pier Two renovation, additional mitigation measures and/or NEPA documentation may be warranted. For the parking program, the EA indicates that the nature of the impacts would depend on the pricing structure. To disclose potential impacts and reduce the uncertainty about them, the EA describes each of the groups that could be affected by paid parking (i.e., employees, short-term visitors, and long-term visitors) and how the effects vary according to the prices. FMF has indicated its intent to discuss the fee structure with its residents (tenants), and mitigation measures in the EA propose that FMF coordinate such a program with the San Francisco Recreation and Park Department, which manages the adjacent San Francisco Marina and Yacht Harbor, since it is also in the process of considering paid parking and other improvements.

Degree to which the Action May Establish a Precedent for Future Actions with Significant Effects or Represents a Decision in Principal about a Future Consideration

The lease would establish FMF management for a long period at FMC. The Selected Alternative represents a decision that FMF is the right partner for FMC. The Selected Alternative is a long-term lease between the NPS and FMF. It defines a lengthy contractual and financial arrangement between these two entities, meaning that FMF would continue to operate FMC for the foreseeable future, to the exclusion of another party. The benefits of this arrangement are detailed in the EA under the Purpose and Need for the action. Most notably, the Selected Alternative allows the FMF to continue to operate FMC, providing programmatic benefits to the community and making improvements critical for public health and safety and for preservation of the site's historic status. Entering a long-term lease would not establish a precedent for future actions with significant effects. Rather than establishing a precedent, the lease would solidify an existing relationship that has been effective since 1977.

The Selected Alternative represents a decision in principal that signals the NPS's desire to continue the partnership with FMF. Once a long-term lease is negotiated, it would foreclose consideration of a different operating arrangement or a different entity. Both of these options were considered in the EA and determined to be less desirable than the Selected Alternative.

The Selected Alternative enables FMF to fundraise and make improvements at FMC more likely. These future improvements could affect historic and cultural resources, but the improvements would continue to be regulated by a Programmatic Agreement implementing Section 106 of the Historic Preservation Act. The future improvements could affect the use and function of FMC, but they would continue to be governed by the GGNRA General Management Plan. Finally, the future improvements could affect the marine life or water quality, but they would be subject to conditions and permits from other federal resource agencies. Consequently, future improvements that could result from the Selected Alternative would not be expected to cause a significant effect.

Whether the Action is Related to Other Actions with Individually Insignificant but Cumulatively Significant Impacts

The Council on Environmental Quality (CEQ) regulations implementing NEPA defines a cumulative impact as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (CEQ §1508.7).

The EA considered projects and actions that could contribute to the cumulative effects of the Selected Alternative including on-going maintenance activities at Fort Mason, various projects along the northern waterfront of San Francisco but outside Fort Mason, and projects occurring within the San Francisco Bay. These other actions include:

Ongoing capital improvements at the Fort Mason Center;

Long-term disposal of dredged materials in San Francisco Bay;

Long-term sand mining within San Francisco Bay;

Reconstruction of Doyle Drive in San Francisco;

Execution of the Presidio Trust Implementation Plan for the Presidio;

Remodeling of the San Francisco City Yacht Harbor (adjacent to FMC); and

Potential future transit projects, including the extension of the F-Line streetcar service to Fort Mason and development of a ferry terminal at the FMC.

Implementation of the Selected Alternative could contribute to short-term adverse cumulative effects related to air quality, water resources, wildlife and aquatic life, special-status species, hazardous substances, visitor use and experience, noise, traffic, parking, and pedestrian/non-motorized access during construction periods. However, the intensity of these cumulative effects would vary depending on the resource category potentially affected. With mitigation measures for project-specific effects that would reduce the intensity of the cumulative effects, the project's contribution to cumulative effects would be minimal.

Degree to which the Action may Adversely Affect Districts, Sites, Highways, Structures, or Objects Listed on the National Register of Historic Places or May Cause Loss or Destruction of Significant Scientific, Cultural, or Historic Resources

The Selected Alternative would have a beneficial effect on the preservation of the San Francisco Port of Embarkation National Historic Landmark District. The Selected Alternative improves FMF's capability to finance deferred maintenance and major rehabilitation projects. The site is a National Historic Landmark District; modifications to the grounds or structures must receive the review and approval of the cultural resource professionals at NPS. Until the new Section 106 Programmatic Agreement, which is proposed as part of the Selected Alternative, has been signed, the existing 1992 Section 106 Programmatic Agreement would remain in effect. Accordingly, while the new Section 106 Programmatic Agreement is being negotiated, there would be no difference from existing conditions and the current mechanisms to

ensure compliance with Section 106 of the National Historic Preservation Act. The new Section 106 Programmatic Agreement proposes to provide streamlined (and definitive) review times for the class of undertakings that could result in adverse cultural resources impact (e.g., renovation of Pier One and seismic upgrades of Piers One and Three).

Degree to which the Action may Adversely Affect an Endangered or Threatened Species or its Critical Habitat

As described in the EA, special-status species (Chinook salmon, steelhead, double-crested cormorant, California sea lion, harbor seal, and southern sea otter), their critical habitat, and Essential Fish Habitat occur in the vicinity of the FMC. Potential renovation of Piers One and Three could impact marine resources, including species of special concern that could inhabit areas adjacent to the project site. As with the Pier Two seismic retrofit, prior to retrofit of Pier One and/or Pier Three, NPS would be required to initiate an informal Section 7 consultation with National Marine Fisheries Service regarding those projects' potential effect on listed anadromous salmonids and designated critical habitat. In addition, NPS would contact the California Department of Fish and Game to discuss potential impacts to the Pacific herring. Marine resource mitigation measures included in the *Pier 2 at Fort Mason Seismic Retrofit and Structural Repair Project Environmental Assessment*, or equivalent measures developed in consultation with NMFS and the U.S. Fish and Wildlife Service shall be implemented should the renovation of Piers One and/or Three take place during the term of the long-term lease. If the NPS determines that the renovation of Piers One or Three would be undertaken in a substantially different manner from the Pier Two renovation, additional mitigation measures and/or NEPA documentation may be warranted.

Whether the Actions Threatens a Violation of Federal, State, or Local Environmental Protection Law

Implementation of the long-term lease would violate no federal, state or local environmental protection laws. Assessment of the proposed action has been performed pursuant to the National Environmental Policy Act, which requires consideration of environmental protection laws and regulations. Applicable laws have been considered in preparing the EA.

NO IMPAIRMENT OF PARK RESOURCES

The fundamental purpose of the NPS, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. Impairment is defined as an impact that, in the professional judgment of the responsible park manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values. NPS managers must always, to the greatest degree practicable, seek ways to avoid or minimize impairment to park resources and values. As noted in the EA, implementation of the long-term lease would not impair park resources or values. Rather, the Selected Alternative would enable the FMF to repair and restore buildings experiencing deferred maintenance, to restore Pier One, and to maintain and expand programming and interpretive elements, each of which contributes to the vitality and enjoyment of Fort Mason and the GGNRA.

MITIGATION MEASURES

The EA analyzed the environmental consequences of the project alternatives and focused on seven environmental issues: Visitor Experience, Cultural Resources, Traffic, Consistency with Local Land Use Plans, Urban Quality, Water Quality, and Marine Life. Of the seven topics analyzed fully in the EA, adverse impacts warranting identification of mitigation measures were identified for each topic except Consistency with Local Land Use Plans (for which no adverse consequences were found). A summary of the environmental effects and the mitigation measures is presented below.

MITIGATION MEASURES INCLUDED AS PART OF THE SELECTED ALTERNATIVE

Topic	Mitigation Measure	Responsible Party
Visitor Experience, Air Quality	To reduce effects during the short-term construction, mitigation measures from the Pier 2 EA would be applicable to limit impacts to air and would limit dust emissions that can detract from the visitor experience. These measures include:	Contractor and Subcontractors
	• Cover all trucks hauling soil, sand, and other loose materials, or require all haul trucks to maintain at least two feet of freeboard.	
	• Sweep all paved surfaces at the project construction site daily with water sweepers during dust-creating operations and in locations/routes where dust would be generated as a result of project construction.	
	 Prohibit sweeping surface debris into the bay. Except for concrete trucks, restrict trucks in queue or receiving or delivering loads from idling for more than five minutes. 	
	 Run engines used to propel barges only when necessary to operate the barges. Require the general contractor and all subcontractors to register all applicable powered construction equipment under the Statewide Portable Equipment Registration Program. 	
Visitor Experience, Noise	To reduce effects during the short-term construction, mitigation measures from the Pier 2 EA would be applicable and would limit noise that can detract from the visitor experience. A site-specific construction noise plan will be prepared prior to construction activity that shall identify specific noise control measures to reduce the noise level of affected receptors. These following measures could include:	Contractor and Subcontractors
	• Select equipment capable of performing the necessary tasks with the lowest sound level and the lowest acoustic height possible.	
	Operate and maintain construction equipment to minimize noise generation. Keep equipment and vehicles in good repair and fitted with "manufacturer-recommended" mufflers.	
	 Provide enclosures for noise-producing stationary sources such as generators. Identify the proper height, location, and effectiveness of a noise barrier. 	
	Board up the windows at the FMC Landmark Buildings with heavy plywood and seal the edges.	
Cultural Resources	Restrictions on Major Rehabilitation Projects until Adoption of New Section 106 Programmatic Agreement. Until the	NPS and FMF

Topic	Mitigation Measure	Responsible Party
	new Section 106 Programmatic Agreement is adopted, the existing 1992 Section 106 Programmatic Agreement would remain in effect. The 1992 Section 106 Programmatic Agreement covers maintenance and repair activities undertaken by the FMF that would fall into the proposed Class 1 and Class 2 improvements under the new agreement. Under the existing Section 106 Programmatic Agreement, these improvements would continue to undergo the 5X process, which would assure attainment of the historic preservation standards. The Class 3 major rehabilitation projects that would become the responsibility of the FMF under the Selected Alternative are not covered by the existing agreement and require full Section 106 consultation. Major rehabilitation Class 3 projects that could have an adverse effect on an historic resource may not begin until the new Section 106 Programmatic Agreement has been adopted and the Section 106 consultation process for the proposed action completed.	
Cultural Resources	Fundraising and Philanthropic Donations for Historic Preservation. Fundraising efforts by FMF could help defray some of the anticipated costs for upkeep of the Historic Landmark District. The NPS would collaborate with the FMF to maintain an ongoing effort to raise funding in support of correcting deficiencies identified in the 1999 Campus Assessment. Each would be responsible for identifying potential funding sources and grants and jointly establishing an annual workplan for fundraising activities and priorities.	NPS and FMF
Transportation	Enhanced Transportation Demand Management (TDM) Program. FMF operates an effective on-going TDM program. With the eventual growth of activity due to the development of Pier One and the conversion of the FMC parking to pay parking, there is a need to formalize and enhance the TDM program. The FMF has prepared a formal TDM program. The TDM recommendations include a provision of a grace period or an initial period of free parking to accommodate short-term visitors, if parking fees are instituted, in order to reduce the impact of the parking fee on the visitor experience.	Once accepted by the FMF and NPS, the FMF would have responsibility for implementing the recommendations of the TDM program.
Transportation	Parking Lot Improvements. The effectiveness of the existing and future revisions to the TDM program is related to the ability of FMC visitors to easily access the existing FMC parking lots. The existing entrance area and parking lot of FMC should be improved through better signage/wayfinding, roadway and parking lot marking and channelization, and lighting. These improvements should be designed to efficiently serve transit vehicles, pedestrians, bicyclists, and persons with disabilities.	FMF

Topic	Mitigation Measure	Responsible Party
Transportation	Coordination with Other Agencies for Transportation Improvements. Since both the City Yacht Harbor and the Presidio are in the process of considering paid parking and other improvements, the FMF should actively maintain ongoing communication and coordination with these agencies. The implementation of parking pricing at FMC needs to be fully coordinated with these agencies. These agencies should also continue to coordinate their efforts to participate in the upcoming study of the extension of the E/F-line historic trolley and further efforts to develop a ferry passenger service.	FMF
Urban Quality	The construction-related mitigation measures identified to protect visitor experience from dust generation and noise would also reduce effects on Marina District residences and businesses. The Enhanced TDM Program identified to reduce traffic and parking impacts on the Marina District would also help preserve the overall character of the neighborhood. In addition to these measures, the following recommendation would help reduce noise impacts from outdoor activities at FMC.	FMF, Contractor, and Subcontractors
Urban Quality	Restrictions on Amplified Sound Systems. If outdoor events are held with amplified sound systems, the FMF will ensure that the event sponsors direct the speakers to maintain noise levels at the nearest neighbors below 60 dBA.	FMF
Water Quality	Construction Best Management Practices to Control Construction Debris. Effects of construction will be evaluated at the design stage; however, future work will be performed in a manner consistent with the Pier 2 EA mitigation measures, which stipulated that no construction debris enter bay waters, as required by the Regional Water Quality Control Board. The specific means by which this mandate is achieved will be left up to the general contractor with approval and oversight provided by the National Park Service. Means should include best management practices set forth in the California Storm Water Best Management Practices Handbooks, such as the use of vacuum recapture devices during sandblasting and the installation of containment netting, scaffolding, or a false bottom under the pier during demolition activities.	Contractor and NPS
Water Quality	Installation of Barriers to Prevent Surface Runoff. Impermeable barriers or dikes shall be installed at the edge of pier aprons and the adjacent seawall prior to starting construction, to prevent surface runoff from entering bay waters.	FMF

Topic	Mitigation Measure	Responsible Party
Water Quality	Construction Best Management Practices to Control Releases of Water Quality Contaminants. Potential contaminants and erodible materials stockpiled on deck aprons, barges, or within 100 feet of the shoreline shall be covered with tarps during construction, and potential pollutants (e.g., paints, grouting materials, fuels, epoxy resins, etc.) shall be stored with proper containment and outside of areas where contact with stormwater runoff or bay waters could occur.	FMF, Contractor, and Subcontractor
Water Quality	 Required Permits. Prior to construction, the NPS would need to obtain approvals and/or permits from resource agencies, such as the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, the National Marine Fisheries Service, and the San Francisco Bay Conservation and Development Commission. Applicable permits that protect water quality and that would need to be obtained by NPS include: The U.S. Army Corps of Engineers' Nationwide Permit Program, specifically Nationwide Permit No. 3 (Maintenance) under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act; The California Regional Water Quality Control Board, San Francisco Bay Region, related to their Conditional Water Quality Certification and Waiver of Waste Discharge Requirements (Section 401 of the Clean Water Act); The specific conditions of the National Marine Fisheries Service to be set forth as part of the informal Section 7 (Endangered Species Act) consultation process; and The specific conditions of the San Francisco Bay Conservation and Development Commission, based on concurrence with the NPS's Coastal Zone Management Act consistency determination. 	NPS
Marine Life	Monitoring to Avoid Herring Spawning. Consistent with Pier Two rehabilitation, during the spawning season for Pacific Herring (mid-November through March), a biologist with a background in fisheries shall regularly monitor the site for presence of herring. If herring spawning is occurring in the project area, the aquatic biologist shall contact the NPS, and a range of mitigation measures may be taken to avoid impacting the spawning, including stopping work for up to two weeks, continuing work in other areas, or screening the work area to prevent spawning.	FMF and contracted biologist

Topic	Mitigation Measure	Responsible Party
Marine Life	Restrictions on Pile Driving. If pile driving is necessary for construction in the water or pier restoration work, the contractor shall be required to conduct steel pile driving, if any, between June 15 and October 15 in order to avoid impacts to the migration of federally listed salmon and steelhead.	Contractor
Marine Life	Required Permits. Prior to construction, the NPS would need to obtain approvals and/or permits from resource agencies, such as the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the National Marine Fisheries Service. Applicable permits that protect marine life and that would need to be obtained by NPS include: The U.S. Army Corps of Engineers' Nationwide Permit Program, specifically Nationwide Permit No. 3 (Maintenance) under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act; The California Regional Water Quality Control Board, San Francisco Bay Region, related to their Conditional Water Quality Certification and Waiver of Waste Discharge Requirements (Section 401 of the Clean Water Act); and The specific conditions of the National Marine Fisheries Service to be set forth as part of the informal Section 7 (Endangered Species Act) consultation process.	Contractor

CONCLUSION

The Selected Alternative is consistent with the Programmatic Agreement implementing Section 106 of the National Historic Preservation Act at the GGNRA, and would not diminish the integrity of the San Francisco Port of Embarkation National Historic Landmark District. The Selected Alternative is not anticipated to adversely affect federally-listed threatened or endangered species known to occur in the project area or designated critical habitat. The Selected Alternative is not likely to adversely affect Essential Fish Habitat protected under the Magunson-Stevens Fisheries Management and Conservation Act. The Selected Alternative is consistent with the Coastal Zone Management Program, as embodied by the McAteer-Petris Act and the San Francisco Bay Plan. The Selected Alternative will also comply with the various applicable sections of the Clean Water Act.

During the project construction period, the Selected Alternative would have short-term adverse effects, the intensity of which could be reduced with implementation of mitigation measures. The Selected Alternative would also have long-term beneficial effects on the quality of the human environment.

Based on the environmental analysis completed, the capacity of the mitigation measures to reduce or avoid impacts, and with due consideration of the nature of public and agency comments, the NPS has determined that the selected alternative would not be a major federal action having the potential to significantly adversely affect the quality of the environment. Thus, in accordance with the National Environmental Policy Act of 1969, as amended, and the regulations of the Council on Environment Quality, an environmental impact statement is not required and will not be prepared for the project.

Recommended:

[Signed by Brian O'Neill on March 3, 2004] Brian O'Neill, Superintendent Golden Gate National Recreation Area, National Park Service

Approved:

[Signed by George Turnbull on March 9, 2004]

Jonathan B. Jarvis, Regional Director
Pacific West Region, National Park Service

Date

ERRATA

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

The following editorial corrections are made on both pages 27 and 63 of the environmental assessment (EA):

- 1. The word "streetcar" replaces "trolley" in all instances.
- 2. The sentence that begins with "The E/F-Line currently extends from the Castro..." is changed to begin with "The F-Line currently extends from the Castro..."
- 3. Following the above sentence, a new sentence is added as follows: "Muni is planning to initiate an E-Line Historic Streetcar Service in the near future that will extend from Jones Street in Fisherman's Wharf via Jefferson and Beach Streets, and then along The Embarcadero and King Street past PacBell Park to the Caltrain Station."
- 4. The sentence that begins with "For many years it has been proposed that this line be extended to Fort Mason..." is changed to begin with "For many years it has been proposed that the E/F-Line be extended to Fort Mason..."

The above changes to the document reflect comments made by San Francisco Municipal Railway (MUNI).

Public Outreach and Review of the EA

The NPS and FMF sought input from the public, other agencies, and environmental organizations throughout the environmental review process. On March 1, 2003, the NPS sent a scoping notice announcing its intention to prepare an EA for the Fort Mason Center Long-Term Lease and to hold a public scoping meeting to determine the scope of impact topics and alternatives to be addressed in the EA (see Appendix A of the EA). The public meeting, held on March 18, 2003, introduced the proposal and invited comments on a number of topics proposed for possible change and study in the planning and environmental review process. Interested parties were encouraged to provide comment on the project through April 16, 2003. Two members of the public spoke at the scoping meeting (Alma Robinson of California Lawyers for the Arts and Michael Alexander), and two written comments, both from resident organizations of the FMF, were received. Without specifically mentioning the lease, one letter from the SFMOMA Artists Gallery opposed implementation of paid parking at the FMC for both visitors and staff, and a second letter from the Performing Arts Workshop fully supported the Fort Mason Center Long-Term Lease.

The EA was circulated for public review on August 8, 2003 and the public review period for the EA closed on September 22, 2003. Notice of the EA availability was posted on the National Park Service (NPS) website at http://www.nps.gov/goga/admin/planning/foma-ea.htm. In addition, about 1,300 mailers were distributed to public agencies, interest groups, organizations, and individuals associated with

the GGNRA, to announce a public meeting to receive public comments. The public meeting for the project was held on September 9, 2003 at the Fort Mason Center. In addition to the oral testimony at the public meeting, five comment letters on the project were received during the public review period. Comments received on the EA and responses to these comments are provided below.

In addition to the above efforts to solicit public input, the National Park Service and the Fort Mason Foundation met with the San Francisco Bay Conservation and Development Commission (BCDC) on August 28, 2003. The intent of the meeting was to present the purpose and need for the proposed long-term lease, to describe how the EA addresses BCDC's Bay Plan, and to discuss BCDC's interests. BCDC's preliminary comments offered at the meeting were incorporated in a comment letter on the EA (described below).

Responses to Public Comments on the EA

- 1. Andrea Gaut, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission (BCDC). Ms. Gaut offered some initial thoughts about the project during an August 28, 2003 meeting with the National Park Service (NPS) and Fort Mason Foundation (FMF), and restated BCDC's points in a comment letter dated September 26, 2003. The letter makes two major points, summarized below.
 - The BCDC believes that the NPS should submit a consistency determination for the proposed lease and future work that the lease will require NPS to complete. BCDC is particularly concerned about (1) placing fill in the San Francisco Bay (Bay) that could result from modifications to Pier One, and (2) limitations on public access to the Bay or shoreline that could result from the possible implementation of a paid parking program and from installation of a fence around the pier aprons. BCDC commented that the gates should be closed at sunset and opened at sunrise, that public access should be assured through the gates during designated hours, and that the design of the fence and gates should be attractive and inviting to the public. The BCDC stated in its comments that the consistency determination should provide consistency analyses with the McAteer-Petris Act and the San Francisco Bay Plan, even though BCDC stated in its scoping letter to the NPS dated June 9, 2003 that the Coastal Zone Management Act "exempts from the coastal zone federal enclaves and federal lands subject to the exclusive jurisdiction of the federal government."
 - The BCDC believes that the FMF would need to obtain a BCDC permit for rehabilitation of Pier
 One and any other work on pier structures and the seawall.

Response: Regarding the first major point, the EA on pages 72 through 79 describes the McAteer-Petris Act of 1965 and BCDC's San Francisco Bay Plan, key provisions concerning bay fill and public access, and how the proposed lease would be supportive of and consistent with these plans and policies. A more detailed response to BCDC has been prepared by NPS in a letter dated October 23,

2003. The letter provides evidence of the proposed action's consistency with these plans and policies and requests BCDC's to make a consistency determination.

Regarding BCDC's expressed concern that a paid parking program could restrict public access to the shoreline, plans for imposition of parking fees at FMC have not been finalized. The EA (page 69) and the Transportation Demand Management Plan (Appendix D of the EA) explain that there are many options for structuring a paid parking program and that there are options to accommodate short-term visitors and employees without substantially affecting parking supply in the neighboring Marina district. The FMF has stated that plans for imposition of parking fees would not be finalized without further discussions with FMC residents.

Regarding BCDC's comments about the proposed gates on the pier aprons, page 26 of the EA states that gates would be installed along the aprons of the piers for improved safety and security. These gates would be locked during nighttime hours as unauthorized activities, such as fires, occur late at night along the pier sheds. Because locking the security fence would be restricted to late-night hours, it is not expected that this would interfere with public access to the waterfront; the vast majority of visits occur during the daylight hours. Ensuring that the gates would be open during designated hours would be the responsibility of the FMF. Design of the gates will not occur until funding is available and plan drawings have been prepared.

BCDC's second major comment states that FMF should obtain BCDC permits for improvements it proposes. The NPS concurs that BCDC should be consulted on future improvements. However, the project is being proposed by the NPS, a federal agency, within federal lands. Therefore, a consistency determination for future work that the lease will require would not appear to be necessary. Work undertaken at FMC is undertaken under the authority of the NPS and with oversight by NPS. Consequently, future projects should be reviewed using the federal consistency determinations, rather than the permitting process required of non-federal project sponsors. Although FMF is a partner with the NPS and intends to make many of the improvements needed to restore and upgrade FMC, modifications must be performed with approval from the NPS.

There is an unusually high level of NPS scrutiny and oversight over FMF maintenance activities and structural modifications at Fort Mason, because the NPS is charged with maintaining the site's integrity as part of the San Francisco Port of Embarkation National Historic Landmark District and preserving the site's history. Actions undertaken by the NPS and the FMF are governed by Sections 106 and 110 of the National Historic Preservation Act. These sections stipulate the need to assess federal actions for potential effect on properties on or eligible for inclusion in the National Register of Historic Places and to avoid, minimize, or develop mitigation measures in the event that a potential adverse effect may result to the historic resource. In order to ensure the preservation of the site's historic status, the NPS has developed protocols for the conservation and adaptive re-use of the structures and the grounds. Specifically, the NPS, the California Historic Preservation Office, and the

Advisory Council on Historic Preservation entered into a Section 106 Programmatic Agreement in 1992 that details the procedures that must be followed for modifications proposed at FMC.

Finally, from an administrative perspective, the NPS has a variety of agreements with different organizations and groups to operate, maintain, promote, and administer lands and activities within the GGNRA. The NPS manages and monitors its partners to maintain protection of GGNRA resources and permitting is a tool to ensure these organizations and groups are not allowed to operate entirely independently. Under this scenario, the NPS would not be aware of proposals and activities that might mistakenly be pursued to benefit the parklands and cultural resources and in reality conflict with state and/or federal regulations and laws. It is absolutely necessary for the NPS to remain in control and to provide for the necessary coordination with resource and regulatory agencies.

2. Alma Robinson, President/Chairperson, Resident Organizations at Fort Mason Center. Ms. Robinson, representing the resident organizations at FMC, spoke at the public meeting on September 9, 2003. Ms. Robinson stated that she supports the proposed lease because it would provide long-term growth and sustenance of FMC, and because it would require the FMF to be responsible for improvements at FMC. Ms. Robinson expressed concerns regarding the loss of existing free parking, which could, in turn, lead to additional vehicles roaming the streets of the adjacent Marina neighborhood in search of parking spaces. These comments are identical to the points that Ms. Robinson made at the earlier scoping meeting on March 18, 2003.

Response: Page 68 of the EA states that under the long-term lease, FMF would have the ability to impose parking fees in the FMC lot. The imposition of parking fees would have the potential adverse effect of some employees attempting to park in the nearby residential areas in order to avoid the fees, as suggested by the commenter. This effect would be more likely on the weekends, when residential parking restrictions are not in force, rather than on weekdays. FMC employees – who would be the most likely group to want to seek out free parking - are not a large portion of the population at FMC on weekend days (see page 69 of EA).

However, plans for imposition of parking fees within FMC have not been finalized. The EA and the Transportation Demand Management Plan (Appendix D of the EA) explain that there are many options for structuring a paid parking program and that there are options to accommodate short-term visitors and employees without substantially affecting parking supply in the neighboring Marina district. The FMF has stated that plans for imposition of parking fees would not be finalized without further discussions with FMC residents.

3. James Lowe, Transit Planner, San Francisco Municipal Railway (MUNI). Mr. Lowe submitted a comment letter dated September 16, 2003. The letter provides editorial corrections regarding transit terminology and MUNI transit line descriptions.

Response. The editorial corrections suggested by MUNI will be incorporated into the EA as stated in the Errata.

4. Terry Roberts, Director, State Clearinghouse. Mr. Roberts submitted a comment letter dated September 23, 2003. The letter acknowledges that the NPS met the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Enclosed with the State Clearinghouse letter was a comment letter from the Department of Transportation (Caltrans), also submitted directly to the NPS and described as Comment #5 below.

Response: The National Park Service acknowledges the comment. No further response is necessary.

5. Timothy Sable, District Branch Chief, Department of Transportation (Caltrans). Mr. Sable submitted a comment letter dated September 4, 2003. The letter states that Caltrans is "satisfied that the project will not have a significant impact to State highway facilities."

Response: The National Park Service acknowledges the comment. No further response is necessary.

6. Gloria Unti, Founder, Performing Arts Workshop (PAW). Ms. Unti submitted a comment letter dated April 2, 2003. The letter states that PAW "fully supports Fort Mason Foundation's proposal for a long-term lease with the National Park Service to continue its operation of the Fort Mason Center."

Response: The National Park Service acknowledges the comment. No further response is necessary.









FORT MASON LONG-TERM LEASE



ENVIRONMENTAL ASSESSMENT







AUGUST 2003





Fort Mason Center Long-Term Lease Environmental Assessment

Prepared for

Fort Mason Foundation

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FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

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Acronyms

BAAQMD - Bay Area Air Quality Management District

BCDC - San Francisco Bay Conservation and Development Commission

CDFG - California Department of Fish and Game

CNDDB - California Natural Diversity Database

CZMA - Coastal Zone Management Act

CWA - Clean Water Act

EA - Environmental Assessment

ESF - Environmental Screening Form

FMC - Fort Mason Center

FMCLTL - Fort Mason Center Long Term Lease

FMF - Fort Mason Foundation

FWS - U.S. Fish and Wildlife Service

GMP - General Management Plan

Golden Gate NRA - Golden Gate National Recreation Area

LOS - Level of Service

MUNI - San Francisco Municipal Railway

NEPA - National Environmental Policy Act

NPS - National Park Service

NMFS - National Marine Fisheries Service

RMP - Regional Monitoring Program

RWQCB - Regional Water Quality Control Board

SFEI - San Francisco Estuary Institute

SWPPP - Stormwater Pollution Prevention Plan

TDM - Transportation Demand Management

USFWS - United States Fish and Wildlife Service

WTA - Water Transit Authority

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

SUMMARY

Background

Located in northern San Francisco on the San Francisco Bay, Fort Mason is part of the San Francisco Port of Embarkation National Historic Landmark District, a major point of embarkation for American troops bound for the Pacific Theater from the Spanish American war through the Korean conflict. In 1972, the U.S. Army transferred responsibility for its maintenance, restoration, and use of the longtime military base to the National Park Service (NPS) as part of the Golden Gate National Recreation Area (GGNRA). While the transfer was intended to restore the military base and convert to a recreational use, a NPS study determined that the unoccupied structures of Fort Mason were subject to vandalism and deterioration, and the GGNRA lacked the $resources \ to \ restore \ and \ develop \ Fort \ Mason \ in$ a manner that would preserve its historic status. At the same time, nonprofit groups expressed an interest in moving to the lower part of Fort Mason, which is the area directly on the Bay. The pier sheds and warehouse buildings provided open architecture for studios and galleries. The interesting Mission Revival style military architecture and convenient access to central San Francisco were also desirable attributes.

In 1976, the Fort Mason Foundation (FMF), a private nonprofit organization, was created by San Francisco civic and business leaders to negotiate with the NPS on behalf of the

nonprofit community. The following year, FMF provided a plan to manage the warehouses and piers as a low-cost public use space and to assist nonprofit organizations in their efforts to provide cultural, educational, and recreational activities to the public. The NPS and the FMF entered into a cooperative agreement, whereby the NPS provides the buildings rent-free and the FMF renovates and maintains the area, as well as develops and administers the Fort Mason Center (FMC) at the lower part of Fort Mason. In addition, FMF committed to provide cultural, recreational, and educational programs to the public at minimum or no cost in accordance with NPS's GGNRA General Management Plan.

Since that time, FMC has served as a national model for military base conversion. The unique public-private partnership has created a cultural and educational resource for residents of and visitors to San Francisco. FMC supports a diverse range of nonprofit organizations, known as "residents," that focus on the visual and performing arts, humanities, education, ecology, and recreation. FMC houses nearly forty nonprofit organizations and is the setting for more than 15,000 meetings, conferences, performances, and special events attended by 1.6 million visitors each year.

The original agreement between the NPS and FMF expired in 1984 and was replaced by another agreement that expires in March 2004. In order to maintain FMC's cultural,



recreational, and educational focus and to protect the integrity of FMC as part of the San Francisco Port of Embarkation National Historic Landmark District, the GGNRA obtained authorization to negotiate a long-term lease with the FMF based upon its record of success. The conversion of the operating arrangements between the NPS and the FMF is the federal action that is the subject of this environmental document.

Purpose and Need

The purpose of the proposed action is to allow the continued operation of the FMC to meet the objectives identified in FMF's mission statement and the 1980 General Management Plan prepared by the NPS for the GGNRA: to create and preserve a cultural, educational, and recreational center, which reflects the unique history, talents, and interests of the people of the Bay Area in partnership with the National Park Service. Towards this end, FMF and the NPS have:

- Served to educate the public about the historical significance of Fort Mason as the Army's major West Coast point of embarkation for American military personnel in the Pacific,
- Preserved the warehouses and pier sheds that are excellent examples of military architecture, in the Mission Revival style,

- Converted the former military structures into performing and visual arts theaters, museums, lecture halls, classrooms, exhibition halls, and conference facilities,
- Encouraged use of the facilities by nonprofit and for-profit organizations, and
- Created and managed a world-class urban park serving the Bay Area community.

Absent the proposed long-term lease, the responsibility for seismic upgrading of the buildings, utility improvements, historic preservation, and restoration of the building exteriors will continue to reside with the NPS. The NPS, due to other priorities and funding limitations, cannot devote the funding or resourcesnecessary to ensure that these major projects for the long-term maintenance and upkeep of FMC are undertaken. A 1999 campus assessment of Fort Mason evaluated the condition of the buildings, piers, and infrastructure at the FMC. The study indicated that improvements were required in three major areas: seismic and life-safety, deferred maintenance, and long-term remedial improvements. Among the highest priority projects identified in the study were the seismic retrofit and structural repair of Piers One and Two. The seismic retrofit and structural rehabilitation of the Pier Two substructure began in early 2003. The NPS has requested funding for the seismic retrofit of the substructures of Piers One and Three, but has not received funding to date.

FMF can help with various capital improvements at FMC; however, its efforts to raise the funds to make these improvements are hampered, because potential contributors and donors expect to know their contributions will have the intended benefit over the long run. The existing cooperative agreement does not contain the financial and contractual provisions to offer these assurances. In addition, FMF cannot monetize future revenue in order to invest in the preservation and rehabilitation of the projects without a lease, since lenders require the security of a lease. Consequently, the NPS seeks to enter into a lease with FMF to ensure that:

- The existing historic structures are restored, preserved and maintained for visitors;
- The National Historic Landmark District retains its integrity;
- The partnership with the FMF is maintained; and
- The visitor experience and recreational, educational, and cultural programs envisioned in its General Management Plan are continued and expanded.

Project Alternatives

The NPS and FMF are considering two project alternatives:

- Extension of the existing cooperative agreement only (the No Action Alternative), and
- Entering into a new long-term lease for up to 60 years (the Preferred Alternative).

Under the No Action Alternative, the responsibilities for maintenance, upkeep, and rehabilitation between the NPS and FMF would remain unchanged. NPS would remain responsible for the maintenance and upkeep of historic structures at FMC. As previously mentioned, given the limited budget for activities at Fort Mason, it is not anticipated that NPS would be able to adequately maintain or restore the historic buildings.

Under the Preferred Alternative, the FMF would continue to manage FMC as it has since 1977. However, the lease term would be longer than the current cooperative agreement, which was for 20 years, and would shift some responsibilities from the NPS to FMF. Most notably, the long-term lease would shift responsibility for parking management and full building maintenance, excluding the substructures of the piers and Building E, from the NPS to FMF and allow FMF to renovate and use Pier One. Responsibility for the seawall and the retaining wall is being negotiated as part of the lease. The final lease term will be



determined in the lease negotiation between NPS and FMF and is subject to the approval of NPS's Regional Director. Implementation of the lease may be phased, and if the lease implementation is phased, the NPS could permit or license parking control to FMF in advance of lease initiation.

The long-term lease would provide FMF the financial and administrative arrangements needed to continue operating the FMC and to invest in needed facilities, enable FMF to undertake financing and fund raising, allow the use of Pier One for programs and activities, and ensure that the National Historic Landmark District is protected through the ongoing use and rehabilitation of the structures. More specifically, a long-term lease makes it possible for the FMF to more effectively fundraise in the philanthropic community and borrow money from lending institutions since the lease can be used as an assurance and incentive for donors and as collateral for those providing financial backing. Currently, under the cooperative agreement, the NPS can withdraw the right of FMF to use the FMC buildings at any time. While this is highly unlikely, given the lengthy and positive partnership, it does create a level of uncertainty and would be an unacceptable condition for financial institutions.

Implementation of the long-term lease agreement makes more feasible the funding of seismic upgrades, building restoration, and utility upgrades identified in a 1999 Campus Assessment of needed improvements. Specific projects that have been identified by FMF as a priority when funding becomes available include:

- Restoration and rehabilitation of the Pier Two substructure (underway in spring 2003),
- Restoration and rehabilitation of the Pier Two shed,
- Seismic retrofit and structural repair of the substructures of Piers One and Three,
- Rehabilitation of the Pier One shed,
- Rehabilitation of the Pier Three shed,
- Seismic retrofit of Buildings A through D, the Gatehouse, and Guardhouse,
- Implementation of new facilities standards for interior and exterior improvements,
- Utility infrastructure upgrading,
- Implementation of parking management, and
- Ongoing upgrading of venues and resident spaces.

In addition to the long-term lease, the Preferred Alternative proposes changes to the way that site improvements are reviewed for potential effects on the Historic Landmark District. Existing regulations and processes established to preserve the historic integrity of the buildings and the Center include Section 106 of the National Historic Preservation Act (NHPA), the

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Secretary of the Interior's Standards for Rehabilitation, and the GGNRA 1992 Section 106 Programmatic Agreement. The 1992 Section 106 Programmatic Agreement lists categorically excluded undertakings that can be reviewed by Golden Gate historic preservation professionals without going through full Section 106 (NHPA) consultation. While these Categorical Exclusions provide a broad range of undertakings that can be reviewed internally, and thus save a significant amount of review time that would be required for full Section 106 consultation, they do not distinguish between low impact activities and more complicated rehabilitation efforts. Activities within the Categorical Exclusions of the Section 106 Programmatic Agreement are subject to the same review processes. The Preferred Alternative would include streamlining the Section 106 review process under a new Section 106 Programmatic Agreement that would divide undertakings into three classes:

- 1. Routine, repetitive, or minor maintenance activities, such as repainting the same color, replacing a broken window or graffiti removal
- 2. Occasional more invasive maintenance repair and rehabilitation activities, such as structural stabilization and other rehabilitation for interior tenant improvements
- 3. Major repair and rehabilitation projects, such as seismic upgrades that might include adverse effects or rehabilitation for adaptive use of Pier One that might include adverse effects

Under the new Section 106 Programmatic Agreement, the first class of activities would require subject matter input from a Golden Gate historic preservation professional on an annual workplan, approved standards, or other program level review but would no longer require the 5X review. In implementing the provisions of the Section 106 Programmatic Agreement, a "Preservation Assessment (5X) Form" was created to review projects with the potential to affect cultural properties in Golden Gate National Recreation Area. The five signatories to the Preservation Assessment Form (hence, the name "5X" review process) are the Park Archeologist, the Park Curator, the Park Historical Architect, the Park Cultural Landscape Architect, and the Park Historian. Completion of the form is intended to comply with Section 106 documentation requirements to address potential effects and measures to minimize harm.

The second class, depending on the extent of the maintenance activity, may be subject to the 5X review. The final class of undertakings that have the potential for adverse effects as defined by Section 106 would include streamlined or reduced review periods for the State Historic Preservation Office and the Advisory Council on Historic Preservation and other interested parties at specific points in the project design process but would result in less review time than would be required under full Section 106 consultation.



Comparison of Alternatives and Environmental Consequences

Based on a preliminary environmental review of the project alternatives and the input received during the public scoping and agency consultation and outreach effort, the NPS and FMF have prepared this Environmental Assessment (EA), pursuant to the National Environmental Policy Act, that focuses on the following environmental topics:

- Visitor Experience
- Cultural Resources
- Transportation
- Consistency with Local Land Use Plans
- Urban Quality
- Water Quality
- Marine Life

Where necessary, mitigation measures are recommended to address major, long-term adverse effects (these measures are summarized in a chart at the end of this comparison of project alternative impacts).

Other topics, including land use, aesthetics, socio-economics, geology, terrestrial biology, air quality, and noise, were dismissed from discussion in the EA. Highlighted below are some of the key differences between the two project alternatives in terms of their environmental impacts.

■ Visitor Experience

Visitor's experience is likely to suffer short-term adverse effects due to increased construction activities under the Preferred Alternative, while having a beneficial long-term effect due to improved maintenance, restoration, and rehabilitation of public spaces and the consequent improvements in public safety. Conversely, the No Action Alternative is likely to result in moderate long-term adverse impacts on the visitor experience due to gradual deterioration of buildings and the potential associated hazards, as well as loss of access to some public spaces.

■ Cultural Resources

The Preferred Alternative would have a beneficial effect on the preservation of the historic integrity of the site due to FMF's enhanced ability to finance deferred maintenance and major rehabilitation projects. The No Action Alternative, on the other hand, could have adverse effects on this cultural resource due to continuous postponement of maintenance. Under both alternatives, mitigation measures are recommended to maintain efforts to secure donations and grants for purposes of historic restoration.

Until the new Section 106 Programmatic Agreement, which is proposed as part of the Preferred Alternative, has been signed, the existing 1992 Section 106 Programmatic



off-site parking with shuttle service are employed by FMF when necessary. Regardless of the project alternative ultimately selected, FMF would continue to implement its TDM program, although an enhanced TDM program

is recommended as a mitigation measure.

Agreement would remain in effect. Accordingly, while the new Section 106 Programmatic Agreement is being negotiated, there would be no difference from existing conditions and the current mechanisms to ensure compliance with Section 106 of the National Historic Preservation Act. The new Section 106 Programmatic Agreement proposes to provide streamlined (and definitive) review times for the class of undertakings that could result in adverse cultural resources impact (e.g., renovation of Pier One and seismic upgrades of Piers One and Three) rather than reverting (as described in the 1992 Section 106 Programmatic Agreement) to the Federal Regulations governing full Section 106 consultation which would be the process continued under the No Action Alternative. Since there is no timeline under these regulations, it is possible that an adverse effect could require months to years in consultation time under the No Action Alternative. In order to ensure that this potential adverse effect does not occur under the Preferred Alternative, mitigation measures are recommended.

The effectiveness of the TDM program to handle "peak" traffic surges and the parking demand depends on visitors and event-goers being able to easily find their way to FMC. For those unfamiliar with the site, the entryway to FMC is confusing because it requires motorists to pass through a poorly signed intersection and a city parking lot, and then once through the FMC gates, to negotiate an unmarked bus turnaround area. This confusing access would be a problem under both the No Action Alternative and the Preferred Alternative. The No Action Alternative would neither improve nor worsen this condition. By contrast, the Preferred Alternative by attracting more visitors to FMC could increase the number of motorists who may be unfamiliar with the site and thereby increase the confusion and delays as FMC visitors seek to enter or leave. Improvements for wayfinding and signage are recommended as mitigation measures.

Transportation

Under the Preferred Alternative, the potential reuse of Pier One could increase visitor levels, trip generation, and parking demand at FMC by 14.5 percent above current levels. While trip generation would increase and thereby result in additional traffic volumes at nearby intersections, all of the intersections are projected to operate at acceptable levels of service. In terms of parking, an increase in visitors may result in a greater demand for parking spaces and more

Transportation-related concerns evaluated in the EA include local circulation and potential impacts at nearby off-site intersections, on-site circulation and orientation, and parking. Notably, FMF already maintains an effective Transportation Demand Management (TDM) program that serves to handle large crowds, traffic movement, and parking requirements in a manner than minimizes impacts on the surrounding neighborhoods. In particular, TDM techniques such as valet parking and remote,



days when parking demand could exceed onsite supply. This impact is expected to be minor, however, because the FMF would have the financial capacity to implement transportation related improvements and the authority to implement paid parking as a parking management tool and a revenue source under the Preferred Alternative. Under the No Action Alternative, the number and range of events, programs, and classes would not be expected to differ from the current calendar of activities. As a result, this alternative would not result in new impacts to traffic or parking. On the other hand, without another long-term, reliable source of revenues, FMF's ability to preserve and improve facilities, produce programs, and maintain the current quality of transportation and parking services could be jeopardized.

Consistency with Local Land Use Plans

The San Francisco Bay Plan, prepared by the Bay Conservation and Development Commission serves as the local policy document for waterfront development, public access, and fill of bay waters. The City and County of San Francisco General Plan contains local policies on land use, transportation, natural resource protection, and recreation. While the FMC is federal property and therefore exempted from compliance with local policies and regulations, the NPS and FMF seek to be good neighbors and to manage and operate FMC in a manner supportive of local policies. Development at FMC is governed by a 1980 General Management Plan that sets forth the directives for the transformation of the former military

base into a cultural, educational, and recreational urban park. The directives in the General Management Plan in terms of public access, recreational opportunities, and preservation of natural and cultural resources are consistent and supportive of the policies in the San Francisco Bay Plan and the San Francisco General Plan. Consequently, neither the No Action Alternative nor the Preferred Alternative would result in conflicts with local land use plans. That being said, the Preferred Alternative, because it makes the restoration of Pier One more feasible, would better achieve local policies to encourage public access to the waterfront and to restore historic structures.

Urban Quality

The Preferred Alternative could increase impacts on the surrounding Marina District neighborhood due to the greater number of events and venues that become available with the restoration of Pier One. However, the impacts would be negligible because the effects of increased activity would be regulated such that the overall character and livability of the neighborhood would be minimally impacted. The No Action Alternative would not have an effect on the Marina neighborhood, as the current conditions would remain unchanged.

■ Water Quality and Marine Life

The Preferred Alternative would have localized and minor, short-term and cumulative adverse impacts on water quality, due to construction activities, the severity of which would be reduced to negligible with implementation of



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mitigation measures. (The Preferred Alternative would have a minor, short-term adverse effect on fish and wildlife in open waters and a negligible adverse cumulative effect on benthic and open water species due to construction. The Preferred Alternative is not likely to adversely affect special status species.) The No Action Alternative would have a negligible long-term adverse effect on water quality and would contribute to a minor long-term adverse cumulative effect on water quality. The No Action Alternative would have no direct effect and would not contribute to a cumulative effect on wildlife and aquatic life, including specialstatus species. Because the No Action Alternative does not assume that the piers are seismically retrofitted, in the event of a collapse, there would be a major, short-term adverse effect on water quality and a moderate to major, short-term adverse effect as well as a moderate to major, short-term adverse cumulative effect on wildlife and aquatic life. However, pier collapse would not likely adversely affect special-status species.



Summary of Mitigation Measures

Section Name	Miligation Measure
Visitor Experience	No mitigation measures are required for either alternative in terms of long-term effects on visito experience. To reduce effects during the short-term construction periods under either alternative mitigation measures are identified from the Pier Two EA (the environmental document prepared to assess and mitigate, where necessary, impacts related to the seismic retrofit of Pier Two) that are applicable to both alternatives. These measures would limit dust emissions and construction equipment noise that can detract from the visitor experience.
Cultural Resources	Fundraising and Philanthropic Donations for Historic Preservation. Fundraising efforts by FMF could help defray some of the anticipated costs for upkeep of the Historic Landmark District. In 2002, FMI received \$80,000 from ArtHouse through its Emergency Property-Related Subsidies Program enabling upgrades to Cowell Theater. In addition, FMF in partnership with the Golden Gate National Recreation Area was the recipient of a \$341,000 Save America's Treasures Grant. The year 200% also marked the initiation of FMF's Historic Preservation Fund that has raised over \$100,000 to date. The NPS would collaborate with the FMF to maintain an ongoing effort to raise funding in support a correcting deficiencies identified in the 1999 Campus Assessment. The NPS and FMF would each be responsible for identifying potential funding sources and grants and jointly establishing an annual workplan for fundraising activities and priorities.
	2. Restrictions on Major Rehabilitation Projects until Adoption of New Section 106 Programmatic Agreement. Until the new Section 106 Programmatic Agreement is adopted, the existing 1992 Section 106 Programmatic Agreement would remain in effect. The 1992 Section 106 Programmatic Agreement covers maintenance and repair activities undertaken by the FMF that would fall into the proposed Class I and Class 2 improvements under the new agreement. Under the existing Section 100 Programmatic Agreement, these improvements would continue to undergo the 5X process, which would assure attainment of the historic preservation standards. The Class 3 major rehabilitation projects that would become the responsibility of the FMF under the Preferred Alternative are not covered by the existing agreement and require full Section 106 consultation. Any major rehabilitation Class 3 project that could have an adverse effect on an historic resource may not begin until the new Section 100 Programmatic Agreement has been adopted and the Section 106 consultation process for the proposed action completed. This measure would assure that these buildings and other facilities do not enter a review process that is indeterminate, which could cause them to experience further disrepair.
Transportation	1. Parking Lot Improvements. The effectiveness of the existing and future revisions to the TDM program is related to the ability of FMC visitors to easily access the existing FMC parking lots. Towards this end, the existing entrance area and parking lot of FMC should be improved through better signage/wayfinding, roadway and parking lot marking and channelization, and lighting. These improvements should be designed to efficiently serve transit vehicles, pedestrians, bicyclists, and persons with disabilities.
	2. Enhanced TDM Program. FMF operates an effective on-going TDM program. With the eventual growth of activity due to the development of Pier One and the conversion of the FMC parking to pay parking, there is a need to formalize and enhance the TDM program. The FMF has prepared a formal TDM plan, which is provided as Appendix D to this document. Once accepted by the FMF and the NPS, the FMF would have responsibility for implementing the recommendations of the TDM plan. Among these recommendations is the provision of a grace period or an initial period of free parking to accommodate short-term visitors, if parking fees are instituted, in order to reduce the impact of the parking fee on the visitor experience.
	3. Coordination with Other Agencies for Transportation Improvements. Since both the City Yacht Harbo and the Presidio are in the process of implementing paid parking and other improvements, the FMI should actively maintain ongoing communication and coordination with these agencies. The implementation of parking pricing at FMC needs to be fully coordinated with these agencies. These agencies should also continue to coordinate their efforts to participate in the upcoming study of the extension of the E/F-line historic trolley and further efforts to develop a ferry passenger service.
Consistency	As activities conducted under the long-term lease would be consistent with the GMP, the San Francisco Bay Plan, the McAteer-Petris Act, and Regulation Section 10704, no mitigation is required to reduce policy inconsistencies.
Urban Quality	Restrictions on Amplified Sound Systems. If outdoor events are held with amplified sound systems, the FMF ensures that the event sponsors direct the speakers to maintain noise levels at the neares neighbors below 60 dBA.



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Water Quality

- 1. Construction Best Management Practices to Control Construction Debris. Effects of construction will be evaluated at the design stage, however, future work will be consistent with the Pier 2 EA, including that no construction debris enters bay waters, as required by the Regional Water Quality Control Board. The specific means by which this mandate is achieved will be left up to the general contractor with approval and oversight provided by the National Park Service. Means should include best management practices set forth in the California Storm Water Best Management Practices Handbooks, which may include the use of vacuum recapture devises during sandblasting and the installation of containment netting, scaffolding, or a false bottom under the pier during demolition activities.
- Installation of Barriers to Prevent Surface Runoff. Impermeable barriers or dikes shall be installed at the edge of all pier aprons and the adjacent seawall prior to starting construction, to prevent surface runoff from entering bay waters.
- 3. Construction Best Management Practices to Control Releases of Water Quality Contaminants. Potential contaminants and erodible materials stockpiled on deck aprons, barges, or within 100 feet of the shoreline shall be covered with tarps during construction, and potential pollutants (e.g., paints, grouting materials, fuels, epoxy resins, etc.) shall be stored with proper containment and outside of areas where contact with stormwater runoff or bay waters could occur.

In addition, the NPS and FMF would adhere to conditions required by permitting agencies, such as the National Marine Fisheries Service and the U.S. Army Corps of Engineers.

Marine Life

- Monitoring to Avoid Herring Spawning. Also consistent with Pier Two rehabilitation, during the spawning season for Pacific Herring (mid-November through March), a biologist with a background in fisheries shall regularly monitor the site for presence of herring. If herring spawning is occurring in the project area, the aquatic biologist shall contact the NPS, and a range of mitigation measures may be taken to avoid impacting the spawning, including stopping work for up to two weeks, continuing work in other areas, or screening the work area to prevent spawning.
- Restrictions on Pile Driving. If pile driving is necessary for construction in the water or pier restoration work, the contractor shall be required to conduct steel pile driving, if any, between June 15 and October 15 in order to avoid impacts to the migration of federally listed salmon and steelhead.

In addition, the NPS would adhere to all applicable conditions for pier restoration work as required by permitting agencies, compiled in Appendix D of the Pier 2 EA.

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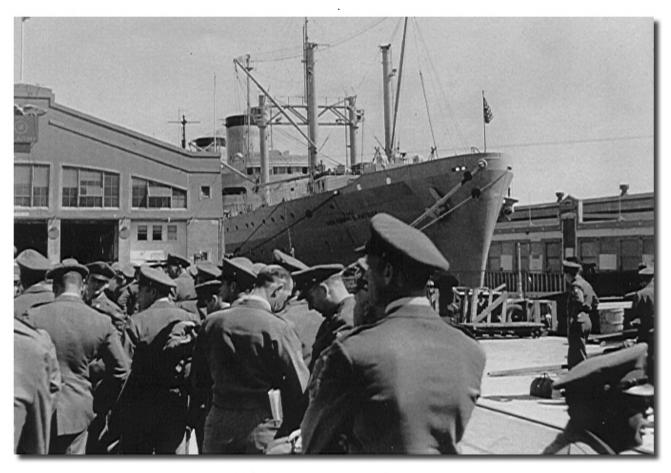
Summary

Chapter 1

INTRODUCTION

Located in northern San Francisco on the San Francisco Bay, Fort Mason is part of the San Francisco Port of Embarkation National Historic Landmark District, a major point of embarkation for American troops bound for the Pacific Theater from the Spanish American war through the Korean conflict, with the greatest activity during World War II. In 1972, the U.S. Army transferred responsibility for its maintenance, restoration, and use of the long-

time military base to the National Park Service (NPS) as part of the Golden Gate National Recreation Area (GGNRA). In 1975, a NPS study determined that the unoccupied structures of Fort Mason were subject to vandalism and deterioration, and the GGNRA lacked the funds and expertise to restore and develop Fort Mason to meet the standards required by the National Historic Preservation Act of 1966 (Hynes, *et al.*, 2000).



U.S. soldiers waiting to ship out of Fort Mason

At the same time, nonprofit groups expressed an interest in moving to the lower part of Fort Mason, which is the area directly on the Bay. The pier sheds and warehouse buildings provided open architecture for studios and galleries. The interesting Mission Revival style military architecture and convenient access to central San Francisco were also desirable attributes.

In 1976, the Fort Mason Foundation (FMF), a private nonprofit organization, was created by San Francisco civic and business leaders to negotiate with the NPS on behalf of the nonprofit community. The following year, FMF provided a plan to manage the warehouses and piers as a low-cost public use space and to assist nonprofit organizations in their efforts to provide cultural, educational, and recreational activities to the public. A cooperative agreement was entered into by the NPS and the FMF, whereby the NPS provides the buildings rent-free and the FMF renovates and maintains the area, as well as develops and administers the Fort Mason Center (FMC) at the lower part of Fort Mason. In addition, FMF committed to provide cultural, recreational, and educational programs to the public at minimum or no cost in accordance with NPS's GGNRA General Management Plan.

Since that time, FMC has served as a national model for military base conversion. The unique public-private partnership has created a cultural and educational resource for residents of and visitors to San Francisco. It supports a diverse range of nonprofit organizations that focus on the visual and performing arts, humanities, education, ecology, and recreation. FMC houses

nearly 40 nonprofit organizations and is the setting for more than 15,000 meetings, conferences, performances, and special events attended by 1.6 million visitors each year. The organizations housed at FMC or its tenants are referred to as "residents."

The original agreement between the NPS and FMF expired in 1984 and was replaced by another agreement that expires in 2004. In order to maintain FMC's cultural, recreational, and educational focus and to protect the integrity of FMC as part of the San Francisco Port of Embarkation National Historic Landmark District, the GGNRA obtained authorization to negotiate a long-term lease for up to 60 years with the FMF based upon its record of success. Implementation of the lease may be phased. The conversion of the operating arrangements between the NPS and the FMF from a cooperative agreement to a long-term lease is the federal action that is the subject of this environmental document. The long-term lease has been identified by the NPS as its Preferred Alternative. The lease will stipulate the terms and conditions for continued operation and maintenance of FMC. Under the current cooperative agreement, FMF has been asked to find residents and to sponsor events in keeping with the 1980 General Management Plan that serves as a blueprint for use of the former military base. Under the new lease agreement, the FMF will continue to perform these functions but also assumes responsibility for the preservation and maintenance of the site, including the seismic upgrading of the historic buildings, except that the NPS will continue to have responsibility for the pier substructures. Responsibility for the seawall and the retaining wall is being negotiated as part of the lease. The lease will provide FMF the financial and administrative arrangements needed to continue operating FMC and to invest in needed facilities, enable FMF to undertake financing and fund raising, allow the use of Pier One for programs and activities, ensure that the Historic Landmark District is protected through the ongoing use and rehabilitation of the structures, and continue a very successful partnership that has benefited the people of the San Francisco Bay Area.

1.1 Purpose

The purpose of the proposed action is to allow the continued operation of the FMC to meet the objectives identified in FMF's mission statement and the 1980 General Management Plan: to create and preserve a cultural, educational, and recreational center, which reflects the unique history, talents, and interests of the people of the Bay Area in partnership with the National Park Service. Towards this end, FMF and the NPS have:

- Served to educate the public about the historical significance of Fort Mason as the Army's major West Coast point of embarkation for American military personnel in the Pacific;
- Preserved the warehouses and pier sheds that are excellent examples of military architecture, in the Mission Revival style;

- Converted the former military structures into performing and visual arts theaters, museums, lecture halls, classrooms, exhibition halls, and conference facilities;
- Encouraged use of the facilities by nonprofit and for-profit organizations; and
- Created and managed a world-class urban park serving the Bay Area community.

The intent of the action is to enable the continued viable operation of the FMC for future generations. The lease (Preferred Alternative) would transfer preservation and maintenance responsibilities from the NPS to FMF and provide a structure that will allow FMF to generate revenues, incur debt, and fundraise as required to preserve, maintain, and operate the Historic Landmark District. It will provide both NPS and FMF a clear understanding of the future of the FMC.

The EA analyzes leasing the FMC to the FMF, because FMF has a single source right to negotiate a new agreement with the NPS for continued occupancy of the FMC. This single source right excludes potential negotiations between the NPS and other organizations. Under the NPS's new leasing regulations, the Department of Interior delegated to the GGNRA the right to lease the facility to FMF on a sole source basis. This decision was based on a 25-year track record of success. Under the existing cooperative agreement, FMF, in partnership

with the NPS, has built an acclaimed cultural center and invested over \$18 million in the preservation of the Historic Landmark District.

1.2 Need

The cooperative agreement between the NPS and FMF expires in March 2004. The proposed action is needed to extend and expand FMF's role in operating the FMC and in preserving and maintaining the Historic Landmark District. Absent the long-term lease, the responsibility for seismic upgrading of the buildings, utility improvements, historic preservation, and restoration of the building exteriors will continue to reside with the NPS. The NPS, due to other priorities and funding limitations, cannot devote the funding or resourcesnecessary to ensure that these major projects for the long-term maintenance and upkeep of FMC are undertaken. A 1999 campus assessment of Fort Mason evaluated the condition of the buildings, piers, and infrastructure at the FMC (TLMS 1999). The study results indicated that improvements were required in three major areas: seismic and life-safety, deferred maintenance, and long-term remedial improvements. Among the highest priority projects identified in the study were the seismic retrofit and structural repair of Piers One and Two. The seismic retrofit and structural rehabilitation of the Pier Two substructure began in early 2003.

FMF can help with various capital improvements; however, its efforts to raise the funds to make these improvements are hampered, because potential contributors and

donors expect to know their contributions will have the intended benefit over the long run, but the cooperative agreement does not contain the financial and contractual provisions to offer these assurances. In addition, FMF cannot monetize future revenue in order to invest in the preservation and rehabilitation of the projects without a lease, since lenders require the security of a lease. Consequently, the NPS seeks to enter into a lease with FMF to ensure that:

- The existing historic structures are restored, preserved and maintained for visitors;
- The National Historic Landmark District retains its integrity;
- The partnership with the FMF is maintained;
- The visitor experience and recreational, educational, and cultural programs envisioned in its General Management Plan are continued and expanded; and
- Funds are secured to make transportation improvements such as improved wayfinding and signage, parking lot improvements, and an enhanced and expanded Transportation Demand Management program.

1.3 Scope of the Environmental Assessment

National Environmental Policy Act

The National Environmental Policy Act (NEPA) requires federal agencies to integrate environmental values into their decision-making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions. The purpose of the National Environmental Policy Act of 1969 (NEPA) is "[t]o declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality."

NEPA is triggered when a federal agency (in this case, the NPS) considers a proposed action that could have impacts on the human and physical environment. Federal actions are defined as projects, activities, or programs funded in whole or in part under the direct or indirect jurisdiction of a federal agency. Federal actions include those carried out by or on behalf of a federal agency, those carried out with federal financial assistance, and those requiring a

federal permit, license, or approval. The NEPA process must be completed before a decision on the proposed action can be made.

If a proposed action is subject to NEPA, one of three types of documents is prepared depending on potential impacts. Generally, if the proposed action clearly has no potential for measurable environmental impact, it is categorically excluded and a short document called a categorical exclusion is prepared. If the proposed action has the potential for significant impact, an environmental impact statement (EIS) is required. If the proposed action would have a measurable impact on the environment, or if it is unclear whether the proposed action has the potential for a significant impact, an environmental assessment (EA) is prepared. If the EA shows the proposed action may have a significant effect on the environment, an EIS is required under normal circumstances. NPS NEPA Guidelines provide guidance on whether an impact should be considered significant, taking into account factors such as the degree to which public safety is affected, potential for controversial impacts, potential for effects on threatened and endangered species, and several other factors. For the FMCLTL, FMF and NPS decided to prepare an EA.

■ Scope of the EA

Consistent with Section 1500.4 of the Council of Environmental Quality's regulations implementing NEPA, issues that are not significant are only addressed briefly in this EA. The NPS uses an Environmental Screening Form from the NPS Director's Order 12 (DO-



12) Handbook to make a preliminary evaluation of those environmental topics that warrant discussion in an EA versus those that can be dismissed. Based on the Environmental Screening Form, the critical topics for discussion in this EA included *visitor experience, urban quality, transportation, and cultural resources*. Topics that have been dismissed from this EA are identified in Section 4.9, with an explanation why they are not being evaluated further in this EA.

NEPA Section 1500.4 also encourages use of a scoping process to "...not only identify significant environmental issues deserving study, but also to de-emphasize insignificant issues, narrowing the scope of the environmental impact statement accordingly." These regulations also apply to the scope and contents of environmental assessments.

Through the scoping process, the FMF, in partnership with the NPS, solicited input from the public, other agencies, and environmental organizations. A public meeting, held on March 18, 2003, introduced the proposal and invited comments on a number of topics proposed for possible change and study in the planning and environmental review process. Interested parties were encouraged to provide comment on the project through April 16, 2003. In addition, the FMF and NPS sent out consultation letters to state and federal agencies with regulatory or review authority over the potentially affected resources to specifically solicit their comments regarding the proposed action. Chapter 5 of this EA describes the scoping response and agency coordination efforts in detail. Three sections were added to the EA in response to the scoping effort: consistency with local land use plans, water quality, and marine life.

Chapter 2

SETTING

For the past 25 years, the Fort Mason Center (FMC) has been a celebration of arts, cultural events, and educational activities located on the City and County of San Francisco's waterfront. Home to nearly 40 nonprofit "residents," or tenants, the FMC hosts approximately 15,000 events a year, produced by over 2,000 different organizations and individuals—events that are a constant reminder of the San Francisco Bay Area's culturally diverse community. Charged with creating and preserving a cultural, educational, and recreational center that reflects the unique history, talents, and interests of the people of the Bay Area, the Fort Mason Foundation (FMF) currently operates the Center under a cooperative agreement with the National Park Service (NPS).

2.1 Fort Mason Center Facilities

Fort Mason, located on the northern waterfront of San Francisco as shown on Figure 2-1, is part of the Golden Gate National Recreation Area (GGNRA), one of the largest and most visited urban national parks. GGNRA encompasses 74,000 acres along 28 miles of coastline in San Francisco, Marin, and San Mateo Counties. The Marina neighborhood of the City and County of San Francisco, along with a waterfront park known as the Marina Green (owned and operated by San Francisco Recreation and Park

Department), and the West and East Harbors separate Fort Mason from the 1,490-acre Presidio of San Francisco to the west.

The 13-acre Fort Mason Center, in the lower area of Fort Mason, is entirely paved and includes landside buildings, three pier-mounted shed buildings on parallel piers, and surrounding surface parking lots and pedestrian circulation areas, as shown on Figure 2-2. Fort Mason is separated by elevation into two areas; upper Fort Mason houses the administrative buildings of the GGNRA, while FMC is occupied by Landmark Buildings A, B, C, D, E, Pier One, Pier Two, Pier Three, the Firehouse, Gatehouse, Guardhouse, and several storage sheds. Table 2-1 provides a building-by-building description of use and total gross square footage. The total developed space at FMC amounts to about 374,310 gross square feet, 302,000 square feet of which is usable. Gross square feet is the total area, including usable area, stairways, and space occupied by the structural elements. Excluding Building E, which is not part of FMF's responsibility, the total developed space managed by FMF is about 331,810 gross square feet.

LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

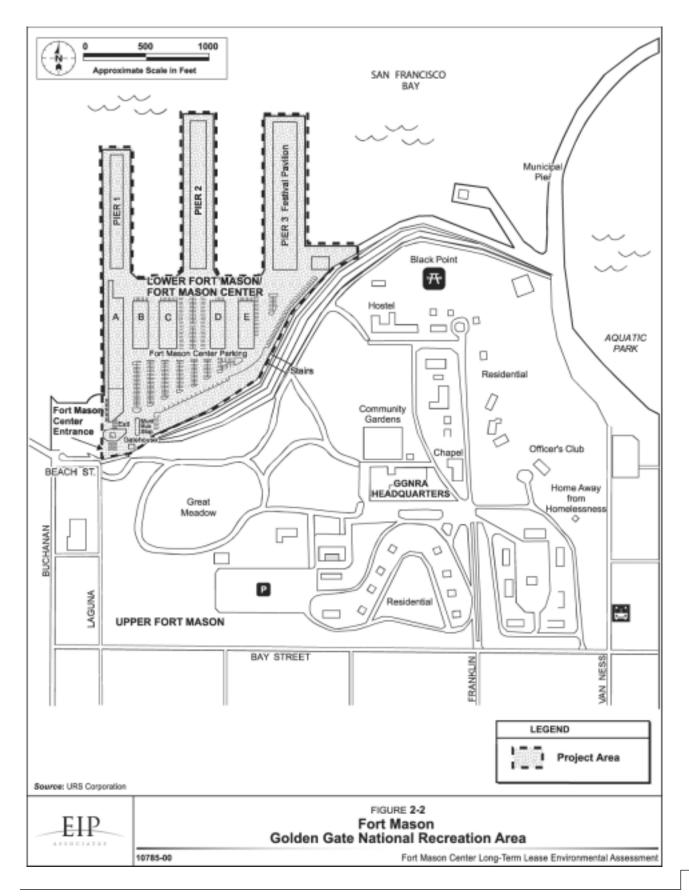




Table 2-1	Fort Mason Center Building Gross Area and Utilization				
Building	Total Gross Area (SF)	Uses			
Gatehouse	736	Classrooms; Meeting and Activity Area.			
Guardhouse	145	Storage.			
Shed Building	1,218	Storage. There is a shed in the middle of the parking lot and a long shed between Greens and Pier One.			
Firehouse	2,680	Event Space; Storage; Toilets.			
Building A	27,668	Event Space; FMF Offices; 2 Galleries; Restaurant.			
Building B	36,514	First Floor: Adult Education Classrooms; Public Corridor; Toilets; Snack bar (Cooks). Second Floor: Adult Education Classrooms; Public Corridor; Toilets. Third Floor: Theatre; 3 Tenant Offices; Meeting Room, Public Corridor; Storage; Toilets.			
Building C	36,680	First Floor: 2 Museums; Children's Art Center; Book Store; Public Corridor Storage; Toilets. Second Floor: 3 Offices; 6 Meeting and Activity Rooms; Public Corridor; Toilets Temporary FMF Box Office/Storage. Third Floor: Theatre; 3 Offices; 3 Meeting and Activity. Rooms; Public Corridors; Storage; Toilets.			
Building D	36,360	First Floor: Museum (includes offices); Public Corridor; Storage; Toilets. Second Floor: 6 Offices; Music School; Public Corridor; Storage; Toilets. Third Floor: 2 Theaters; Public Corridor; Storage; Toilets.			
Building E (note: Building E is excluded from the FMCLTL; square footage is provided for informational purposes only)	42,502	First Floor: Maritime Museum Storage and Archives; Public Corridor; Storage; Toilets. Second Floor: Maritime Museum Offices; 5 Offices; Public Corridor; Storage; Toilets. Third Floor: Maritime Museum Library; Maritime Museum Archives; Public Corridor; Toilets			
Pier One Building	54,700	Vacated NPS Warehouse. Currently used for construction staging. Occasional event support.			
Pier Two Building	60,433	First Floor: 460 Seat Theater at North End; Offices at Theater; Open Exhibition Space at South End; Public Corridor; Storage; Toilets. Second Floor: Theater Offices; Exhibition Offices. Storage			
Pier Three Building	74,736	First Floor: Exhibition Space; Offices; Storage; Toilets; Building Maintenance Shops. Second Floor: Bar Mezzanine; Offices. Third Floor: Offices; Catwalk.			

SF = square feet

Source: Preliminary Site Utilities Investigation for the Fort Mason Campus Assessment, Fort Mason Center, 1999.

In general, Buildings A, B, C, and D house the FMC's nonprofit residents, including the FMF in Building A. FMC also offers a Conference Center in Building A and meeting and activity rooms that are rented to the public in Buildings B and C. Pier One, while not part of the original cooperative agreement, was assigned to FMF

through an amendment to the agreement in July 2002. Previous tenants vacated Pier One in November 2001 so that it could be used as a temporary venue during the rehabilitation of Pier Two. Subsequently, a structural stability study performed in 2001 indicated that Pier One is in need of both seismic and infrastructure

repair. As a result, the majority of Pier One (approximately 80 percent of its square footage) is now vacant and does not house programs or permanent tenants, although it is used for occasional event support. A portion of the pier is used as a construction staging site for the rehabilitation of Pier Two as well as for storage. Pier Two, which is currently undergoing a structural rehabilitation and seismic retrofit of the substructure, houses the Cowell Theater and the Herbst Pavilion. Pier Three houses the Festival Pavilion.



Pier Two

Building E, which is operated and maintained by the San Francisco Maritime Park, is not included in the current cooperative agreement between the NPS and FMF and is excluded from the long-term lease. However, the lease would provide FMF the option to include Building E in its lease if the San Francisco Maritime Park vacates the building.

2.2 Circulation and Parking

A single entrance and exit provides vehicular access to FMC. A signalized intersection at Marina Boulevard and Buchanan Street leads to a parking area for the San Francisco Marina. One block to the east, through the parking lot, is the main entry to FMC. The San Francisco Municipal Railway bus line #28 provides direct transit service to FMC with a bus stop immediately inside the Fort Mason entrance.

Within the gate at the entrance to FMC, there are a total of 450 surface lot parking spaces. With the exception of 13 spaces designated for accessible parking for persons with disabilities, there are no parking restrictions on the use of these spaces and there is no charge for parking. Tenants and visitors to FMC can use the spaces. However, when events that are scheduled are anticipated to create parking demand in excess of the supply, one parking management strategy employed by the FMF is to utilize valet parking to increase parking capacity. The FMF has identified four specific areas for valet parking, and depending on the event size, one or more of these areas are converted to valet parking. In total, these areas provide 230 selfpark spaces or 335 valet spaces. Thus, with the use of valet parking, the parking capacity of the FMC lots can be increased by 105 spaces to a total of 545 spaces.

In addition to valet parking, the FMF currently employs a variety of transportation demand management (TDM) techniques and measures to accommodate tenant and visitor parking demands during the full range of events and



activities that occur throughout the year at Fort Mason. For most days of the year, the self-park parking supply of 450 spaces is sufficient to meet the demand created at FMC. However, there are occasions when large events are hosted at FMC, and alternative parking management strategies are used to avoid adversely affecting the adjacent Marina neighborhood. For large events at FMC, visitors may be asked to use valet parking or to park their vehicles in the neighboring, off-site Yacht Harbor or Gashouse Cove lot (105 spaces), the Marina Green lots (665 spaces), Presidio, and/or the Marina Middle School (500 spaces). Shuttle buses are often used when the Presidio and Marina Middles School off-site lots are utilized.

2.3 Residents and Visitation Levels

FMF is responsible for recruiting and selecting tenants for the FMC. FMC's excellent location and reasonable rents have resulted in high occupancy rates. In fact, there have been few vacancies over the last two decades. FMC currently houses approximately organizations that occupy about 93,548 square feet of building space. Arts and art-related services occupy more than half of the resident square footage, with fine arts and cultural organizations occupying 50 percent, performing arts organizations occupying 29 percent, and legal services relating to the arts utilizing approximately 1 percent of available resident building space. Outdoor recreation, environmental, and animal rights organizations occupy approximately 9 percent of FMC's

residential space, while other services occupy 11 percent of FMC's residential space. "Other services" include two restaurants and several organizations, such as Marine Exchange (which represents the Bay Area maritime community), Book Bay Bookstore, Friends and Foundation of the San Francisco Public Library, and Ploughshares, a peace-focused public grantmaking foundation.



Signage indicating broad range of resident organizations

Approximately 1.6 million visitors per year visit FMC. Most of these visitors are attending events held in the FMC's theater, exhibit halls, or conference center. According to the FMC's Annual Report of Activities for the Fiscal Year ended September 30, 2002, visits to the FMC

during the 2002 fiscal year (FY 2002) totaled 1,693,000, which represents a slight increase over the 2001 fiscal year. During FY 2002, the FMF's daily schedule listed a range of 27 to 45 events on typical days. FMC's six theaters staged over 150 productions during FY 2002, while the FMC's museums and galleries mounted over 50 separate exhibits, attracting an estimated 120,000 visitors. FY 2002 visitors are categorized by facility in Table 2-2, below. Visitors in FY 2003 are expected to decrease, compared to previous years, due to the construction activity associated with the Pier Two Structural Rehabilitation and Seismic Retrofit project that began in March 2003.

2.4 Maintenance and Capital Improvements

FMF is currently responsible for minor maintenance and upkeep of the buildings, and the NPS is responsible for major maintenance, renovations, and seismic upgrades. Generally speaking, FMF maintains the interior of its buildings while NPS maintains the exterior.

Examples of recent maintenance and improvement activities undertaken by the FMF include the renovation of the Firehouse and Conference Center, storm drain repairs, improvements to safety railings, computer upgrades, and the Cowell Theater Capital Improvement Project which included improvements to the heating, ventilation, and air conditioning (HVAC) system, improvements to the configuration of internal stairways, motorization of the curtain and recarpeting of the theater. The NPS is challenged by unmet deferred maintenance needs at the FMC. Adjacent to the San Francisco Bay, the FMC is located in a marine environment that quickly degrades structures. For example, many structures are plagued by spalling concrete (concrete that is breaking off in scales or chips due to rusted rebar underneath) and by degraded utilities. Electrical systems, heating, and ventilation are also in need of extensive upgrades. With the exception of the Firehouse, and the current Pier Two substructure project, the buildings at the FMC have not undergone seismic retrofit.

Table 2-2 Fort Mason Center Total (Including Pi		
Type or Location of Use	Number of Visits	Percentage of Total
Nonresident organization events (Conference Center, Firehouse, Meeting Ro	ooms, Gatehouse) 542,000	32%
Resident organization activities (theatre, museums, classes, conferences, and	meetings) 494,000	29%
Herbst and Festival Pavilions	281,000	17%
Fort Mason Art Center (and extension classes)	165,000	10%
Greens Restaurant	150,000	9%
Cowell Theatre productions	60,000	4%
Total Attendance	1,692,000	101%
Tetal effections assets than 100% due to rounding		

Total attendance greater than 100% due to rounding

Source: Fort Mason Foundation, 2002



To ensure the integrity of the San Francisco Port of Embarkation National Historic Landmark District and to preserve the atmosphere of the FMC's history, the NPS strictly monitors maintenance activities and structural modifications at the FMC. Given the historic nature of FMC, actions undertaken by the NPS and the FMF are governed by Sections 106 and 110 of the National Historic Preservation Act. These sections stipulate the need to assess federal actions for potential effect on properties on or eligible for inclusion in the National Register of Historic Places and to avoid, minimize, or develop mitigation measures in the event that a potential adverse effect may result to the historic resource. In order to ensure the preservation of the site's historic status, the NPS has developed protocols for the conservation and adaptive reuse of the structures and the grounds. Specifically, the NPS, the California Historic Preservation Office, and the Advisory Council on Historic Preservation entered into a Section 106 Programmatic Agreement in 1992 that details the procedures that must be followed for modifications proposed at FMC. All including undertakings, structural modifications, are required to undergo a "5X" review process to further ensure that changes are consistent with the FMC's landmark designation. The 5X review process refers to the five signatures required on Preservation Assessment Forms, which must be filled out for projects that have the potential to affect cultural properties in the GGNRA. Signatures are required from the Park Archeologist, Park Curator, Park Cultural Landscape Architect, Park Historical Architect, and Park Historian.

2.5 Programming and Interpretive Elements

The 1980 NPS General Management Plan identified a grand vision for Fort Mason:

Here the cultural color and diversity of the people of the San Francisco Bay Area will be revealed in theaters, studios, workshops, galleries, and classrooms imaginatively created within one pier building and two or more warehouses. To the Bay Area resident this center will represent one more important source of entertainment and enrichment. To the out-of-towner spilling in from Fisherman's Wharf it could become a convenient place to learn more about one of the Bay Area's prime attractions—its people (NPS 1980).

In 2002, FMC celebrated its twenty-fifth anniversary and local newspaper accounts reflected the successful partnership of FMF and NPS. *The Independent* wrote:

Since 1977, Fort Mason has served as a home to 40 of the city's nonprofit arts, cultural, educational, and recreational organizations, at very low rent...The galleries of Mexican Museum, Museo ItaloAmericano, the San Francisco African American Historical and Cultural Society, and the Museum of Craft and Folk Art collectively form a multicultural showcase for the city's wide range of communities and interests (*The Independent*, September 17, 2002).

A local columnist in the *San Francisco Chronicle* wrote:

...somehow 1.6 million people seem to find the Fort Mason Center each year – because the site offers some of the best views of the bay, has abundant free parking and is home the Greens Restaurant. That helps explain why the Fort Mason Center is considered a national model of adaptive reuse for a former military base and why it has become a major cultural force in a city prides itself on its social and artistic diversity (Garcia, *San Francisco Chronicle*, October 4, 2002).

The number of FMC residents today is about forty and includes a diverse group of theaters, museums, a music school, a maritime library, a radio studio, a gourmet vegetarian restaurant, and a variety of other arts, education, and environmental organizations. The range of approximately 15,000 annual activities—fairs, exhibits, lectures, festivals, performances and symposia, and classes in health, the environment, martial arts, the media, recreation, performing, and visual arts—demonstrates that the original charter when the NPS decided to convert this military base to a cultural showcase has been successfully implemented.

Interpretive elements are present to explain current and historical uses of the FMC to its visitors. Interpretive elements, which serve to educate visitors and present the FMC in understandable terms, include waysides and docent-led tours. Waysides, implemented and maintained by NPS, provide visitors with a sense of history and place. They include historical photographs of Port of Embarkation along with text explaining past uses of the FMC. For example, the wayside shown in Figure 2-3 explains that visitors to the FMC site would have been standing on sand dunes prior to the construction of Piers One, Two, and Three by the U.S. Army. Tours of the FMC, are offered by FMF, focus on present day uses such as the Cowell Theater, the Mexican Museum, and the San Francisco African American Historical and Cultural Society.

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT



Chapter 3

DESCRIPTION OF ALTERNATIVES

This chapter of the EA describes alternatives to achieve the purpose and need presented in Chapter 1. Two alternatives have been identified: continuation of the existing cooperative agreement, defined as the "No Action" Alternative, and a long-term lease with a duration of up to 60 years, identified by the National Park Service (NPS) as the "Preferred" Alternative. Alternatives considered but dismissed from further consideration are identified at the end of this chapter.

3.1 No Action Alternative

Since 1977, the Fort Mason Foundation (FMF) has operated the Fort Mason Center (FMC) under a cooperative agreement with the NPS. In 1977, FMF provided a plan to administer the warehouses and piers as a low-cost public use space and to assist nonprofit organizations in their efforts to provide cultural, educational, and recreational activities to the public. A cooperative agreement was entered into by the NPS and the FMF, where the NPS provides the FMC buildings rent-free in exchange for provision of capital improvements and maintenance activities by FMF. FMF also develops and administers the FMC to provide cultural, recreational, and educational programs to the public at minimum or no cost. The original agreement between the NPS and FMF expired in 1984 and was replaced by another agreement that expires in March 2004. Under the No

Action Alternative, it is assumed that the current cooperative agreement would be extended under the existing agreement conditions.

NPS would remain responsible for the maintenance and upkeep of historic structures at FMC. Given the limited budget for activities at Fort Mason, it is not anticipated that NPS would be able to adequately maintain or restore the historic buildings. For example, although the structures require seismic retrofit, since NPS took responsibility for the FMC in 1972, it has obtained authorization for the funds required to retrofit the substructure of Pier Two. If left to NPS alone, the buildings would likely continue to suffer from deferred maintenance. At present, the rate of deterioration of some facilities is rapidly accelerating, placing certain structures at risk. Although the site is a National Historic Landmark District, the NPS does not have the resources to protect the historic integrity of the structures at the FMC or fund future upgrades that comply with preservation requirements of the National Historic Preservation Act.

Under the No Action Alternative, would remain as-is within the reasonably foreseeable future because the NPS does not have funding to undertake the required seismic upgrade of the pier substructure or the shed. While NPS hopes to obtain authorization for the substructure within the decade, it is most unlikely that it could obtain funding for the shed rehabilitation as well in the foreseeable future. The overlying shed,



vacated because of its poor conditions and likely failure in the event of a major earthquake, would not be programmed for seismic retrofit. The pier would continue to be used primarily as a storage area, occasionally as a construction staging area, and for occasional event support. Consequently, prior studies of expanding FMC's offerings and exhibits spaces would be unrealized, and the number and mix of tenants would be expected to remain the same as under current conditions. Without the rehabilitation of Pier One, no new income would be generated to expand existing programs, add new programs, or preserve and rehabilitate facilities. The visitor levels would likewise be about the same as shown in Table 2-2.

Current parking and traffic conditions would be maintained. The Transportation Demand Management practices are functioning effectively, and substantial refinements to the parking system, such as implementation of paid parking, would not be undertaken.

The range and diversity of programs and activities would continue to represent the talents of the San Francisco Bay Area communities. Tenants of FMC are known as "residents." The current criteria for selecting resident organizations—namely, to foster awareness of the area's cultural and artistic resources and to provide free or low-cost services or activities—would remain unchanged from the original vision articulated in the 1980 General Management Plan.

Under the No Action Alternative, it would be difficult to attract significant development funds

since donors would not have the assurance that their contribution would serve its intended purpose over the long run; additionally, it would not be possible to finance preservation and rehabilitation since lenders require the security of a lease.

3.2 Preferred Alternative, Long-Term Lease and Updated NHPA Section 106 Programmatic Agreement

The Preferred Alternative is a long-term lease of up to 60 years as defined in 36CFR Part 18 (Revised July 1, 2002) between the NPS and FMF for the continued operation of FMC and a related refinement to the 1992 Section 106 Programmatic Agreement that spells out historic preservation procedures and mitigation strategies in conformance with the National Historic Preservation Act. These two elements are discussed below.

■ Long-Term Lease

The FMC is currently operated under a cooperative agreement between the FMF and NPS that expires in March 2004. Under the long-term lease of up to 60 years between the NPS and FMF, the FMF would continue to manage the FMC as it has since 1977. However, the lease term would be longer than the current cooperative agreement, which was for 20 years, and would shift some responsibilities from the NPS to FMF. Most notably, the long-term lease would shift responsibility for parking



management and full building maintenance, excluding the substructures of the piers and Building E, from the NPS to FMF and allow FMF to renovate and use Pier One. Responsibility for the seawall and the retaining wall is being negotiated as part of the lease. The final lease term will be determined in the lease negotiation between NPS and FMF and is subject to the approval of NPS's Regional Director.

Under the Preferred Alternative, FMF would pay Fair Market Value rent for the FMC buildings it occupies with credit given for programmatic benefits and capital investments. The FMF is financially self-sustaining under the terms of the current cooperative agreement. With the new lease, FMF projects that it will become financially self-sustaining again with the added preservation and maintenance responsibilities upon completion of seismic stabilization of the piers and renovation and occupancy of Pier One. FMF would engage in fundraising and private financing to complete necessary capital improvements, using FMC leasehold interest as collateral. Net cash generated by the FMC and rents payable to the NPS would be reinvested into the FMC. Since these funds would be reinvested in the FMC, capital improvements and programmatic benefits would offset rent, at least during the first ten years of the lease. Final terms will be determined through the lease negotiations. Under the cooperative agreement, FMF makes capital investments and programmatic contributions in lieu of rent. While no immediate or dramatic changes to resident lease terms are planned, office rents would continue to migrate toward market rates since FMF would have the

added expense associated with maintenance and preservation. Along-term lease makes it possible for the FMF to more effectively fundraise in the philanthropic community and borrow money from lending institutions since the lease can be used as an assurance and incentive for donors and as collateral for those providing financial backing. Currently, under the cooperative agreement, the NPS can withdraw the right of FMF to use the FMC buildings at any time. While this is highly unlikely, given the lengthy and positive partnership, it does create a level of uncertainty and would be an unacceptable loan term for financial institutions and a deterrent to prospective investors.

Key differences between the Preferred Alternative and the No Action Alternative in terms of responsibilities and possible improvements are enumerated in Table 3-1.

FORT MASON CENTER FACILITIES

Under the Preferred Alternative, FMF anticipates being able to raise funds to pursue the capital improvements and maintenance projects that were identified in a 1999 Campus-Wide Assessment of the FMC's buildings and utilities. To the extent that FMF is successful, there are several priority projects envisioned, the most notable being the restoration and reuse of Pier One and the seismic retrofit and rehabilitation of the Pier Two shed. The renovation of Pier One would enable FMC to offer about 54,700 gross square feet of resident, classroom, and exhibit space. It should be noted that the renovation of Pier One requires NPS to obtain appropriations for the seismic retrofit and structural rehabilitation of the substructure.

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT



Table 3-1 Comparison of Alternatives: No Action (Current Cooperative Agreement) and Preferred Alternative (Proposed Lease Agreement)

(Applies to Buildings A-D, Guardhouse, Gatehouse, and Firehouse, except where noted)

(Applies to Buildings A-D, (ouairaniouse, ou	terrouse, una ra	enouse, except where it	orea,
Responsibility	No Action: Under current cooperative agreement	Preferred Alternative: Under new lease (bold text indicates change under new lease)	Potential improvements Under lease	Phasing for Polentia Improvements (Included as part of the Preferred Alternative)*
REHA	BILITATION AND N	MAINTENANCE OF		
1. Structure (Shed)	NPS	FMF	Stabilize shed, the upgrade to fully serviceable condition ²	Phase 1 and Phase 4
2. Substructure (Pilings, etc.)	NPS	NPS	Seismically upgrade and structurally rehabilitate ³	Phase 4
REHAI	BILITATION AND N	AINTENANCE OF	PIER TWO	
1. Structure (Shed)	NPS	FMF	Upgrade shed to fully serviceable condition ⁴	Phase 1
2. Substructure (Pilings)	NPS	NPS	Seismically upgrade and structurally rehabilitate— in progress	Phase 1
REHAB	ILITATION AND MA	AINTENANCE OF P	PIER THREE	
1. Structure (Shed)	NPS	FMF	Upgrade shed to fully serviceable condition	Phase 5
2. Substructure (Pilings)	NPS	NPS	Seismically upgrade and structurally rehabilitate	Phase 5
	OTHER IM	PROVEMENTS		
1. Parking Control	NPS	FMF	Install equipment required to control parking lot and implement paid parking. Upgrade guardhouse.	Phase 1
 Seismic retrofit and structural rehabilitation of Buildings A–D 	NPS	FMF	Seismically retrofit and rehabilitate.	Phase 2
3. Seismic Retrofit and structural rehabilitation of Building E	NPS	NPS	No change	
4. Wayfinding and Signage	NPS/FMF	FMF	Implement Wayfinding and Signage Master Plan	Phase 3
5. Seawall	NPS	Will be negotlated as part of the lease	Maintain structural integrity	As funding becomes available
6. Retaining Wall	NPS	Will be negotiated as part of the lease	Maintain structural integrity	As funding becomes available
	EXTERIOR UTIL	ITY MAINTENANC	E	
1. Sewage (from building to main)				
Repair Replacement	FMF FMF	FMF FMF	Upgrade system components as required	Phase 6



FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

Table 3-1 Comparison of Alternatives: No Action (Current Cooperative Agreement) and Preferred Alternative (Proposed Lease Agreement)

(Applies to Buildings A-D, Guardhouse, Gatehouse, and Firehouse, except where noted)

Responsibility	No Action: Under current cooperative agreement	Preferred Alternative: Under new losse (bold text indicates change under new lesse)	Potential Improvements Under issse	Phasing for Potential Improvements (Included as part of the Preferred Alternative)!
2. Plumbing				
Repair Replacement	FMF FMF	FMF FMF	Upgrade system components as required	Phase 6
3. Electrical				
Repair Replacement Security lighting	NPS NPS NPS	FMF FMF	Upgrade system components as required	Phase 6
4. Conversion of Utilities				
Installation Repair Replacement	FMF FMF FMF	FMF FMF FMF	Upgrade electrical, water, sewage, and telecommunication systems components as required	Phase 6
5. Natural Gas Systems				
Repair Replacement	FMF FMF	FMF FMF	Upgrade system components as required	Phase 6
	STRUCTURA	L MAINTENANCE		
1. Roofs & Appurtenances				
Repair and maintenance Replacement	FMF NPS	FMF FMF	As needed	Phase 2
2. Gutters and Downspouts				
Repair and maintenance Replacement	FMF NPS	FMF FMF	As needed	Phase 2
3. Fire Escapes				
Maintenance, repair, painting Replacement New installation	FMF NPS FMF	FMF FMF	As needed	Phase 2
4. Exterior Painting				
Removal of graffiti Structural changes Total painting	FMF FMF NPS	FMF FMF	As needed	Phase 2
5. Windows				
Maintenance Replacement	NPS NPS	FMF FMF	As needed	Phase 2
6. Doors				
Maintenance Replacement	FMF NPS	FMF FMF	Repair defective doors	Phase 2

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT



Table 3-1 Comparison of Alternatives: No Action (Current Cooperative Agreement) and Preferred Alternative (Proposed Lease Agreement)

(Applies to Buildings A-D, Guardhouse, Gatehouse, and Firehouse, except where noted)

Responsibility	No Action: Under current cooperative agreement INTERIOR I	Preferred Alternative: Under new lease (bold text indicates change under new lease) MAINTENANCE	Potential Improvements Under lease	Phasing for Potential Improvements (Included as part of the Preferred Alternative)!
Painting, Heating, Plumbing, Electrical, Sewage, Elevators, Fire Protection and Intrusion Alarm Systems, Structural Changes, Flooring and Sub-Flooring, & Janitorial Services	FMF	FMF	Upgrade interiors to conform with FMF standards	Phase 2
	GROUNDS	MAINTENANCE		
1. Litter clean up	NPS	FMF	As needed	On continual basis
2. Provision of trash receptacles	NPS	FMF	As needed	On continual basis
Trash receptacles adjacent to each structure	NPS	FMF	As needed	On continual basis
4. Debris boxes	FMF	FMF	As needed	On continual basis
5. Lawns and plantings	NPS	FMF	Not applicable (No Lawns)	On continual basis
6. Trees	FMF	FMF	Not applicable (No Trees)	On continual basis

- Those activities and improvements scheduled to occur during Phase 1 are likely to happen sooner than those scheduled to occur during Phase 6; however, timing of phasing is not known at this time.
- Includes new roof and seismic collectors at roof, spalling repair, window replacement (including 3 panes of clear glass), painting, and FORT MASON CENTER graphics.
- Upon completion of Pier 1 Substructure Seismic Retrofit and Structural Rehabilitation, upgrade shed to fully serviceable condition. Includes seismic retrofit, new storefront and doors, new interior improvements such as restraoms, event venues, HVAC systems, upgrades required to prepare for tenant improvements, guardrails, utility services, telecommunications, etc.
- Includes seismic retrofit, re-roofing, spalling repair, repair of doors and windows, restroom upgrades, guardrail retrofit, apron repair, etc. To be undertaken upon completion of Pier Two Substructure Seismic Retrofit and Structural Rehabilitation

A number of feasibility studies have been prepared over the years to explore re-use options of Pier One. It is anticipated that Pier One would contain similar uses as the other buildings of the Fort Mason Center, such as meeting space, food service, and gift shops, and museum/cultural space. According to the latest plans, Pier One would contain about 44,000 square feet of

usable space. Since Fort Mason Center currently contains about 302,000 square feet of usable space (this includes Building E, which is used by the San Francisco Maritime National Historic Park and is not operated by the FMC), the opening of Pier One would add about 14.5 percent to the total available square footage. Approximately half of the space in Pier One



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LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

would be visitor oriented and the other half would be leased tenant space. This mix is consistent with the current breakdown of uses at FMC. Thus, with the completion of the Pier One renovations, which are expected to require 7 to 10 years, visitor levels of the total FMC complex could be expected to increase by up to 14.5 percent above current levels, to about 1.9 million annual visitors (see further description below under "Residents and Visitation Levels"). This is a conservative estimate of growth, so the actual increase in visitors may be less. This estimate is conservative because visitor-oriented uses generate more traffic and parking demand than the residents at FMC. However, all of the Pier One floor area has been assumed to contribute trips and parking demand as if the space were entirely used for visitor-oriented venues, even though the visitor-oriented uses would be about half of the total space with residents using the other half of the total space.



Pier One

According to the Preferred Alternative, Building E would continue to be operated by the San Francisco Maritime National Historical Park; however, FMF would have the option to lease Building E upon termination of Maritime Park tenancy. The San Francisco Maritime National Historical Park collects, preserves, and interprets information on maritime history on the Pacific Coast. The Historic Documents Department, located in Building E of the FMC, manages the collection, conservation, and cataloging of the documents, photographs, and vessel plans. The J. Porter Shaw Library, also housed in Building E, is one of the four preeminent libraries of commercial maritime history in the country. Although Building E is not part of the FMCLTL, the Maritime Park's Historic Documents Department and Library were considered in this EA with respect to traffic and visitor circulation impact assessment. At this time, there is no specified date for the termination of the Maritime Park tenancy; however, this could occur during the term of the proposed lease agreement between FMF and NPS. In this event, the Golden Gate National Recreation Area (GGNRA) and FMF would develop a mutually agreeable terms under which the operation, maintenance, and preservation of Building E would be added to the FMF lease.

TRANSPORTATION AND PARKING

Under the proposed lease agreement, FMF would manage parking and traffic. If lease implementation is phased, NPS could permit or license parking control to FMF in advance of lease initiation. It is not expected that the number of parking spaces available at the FMC



would change. The current Transportation Demand Management (TDM) Program was developed based on a 1995 Transportation Management Plan prepared by Wilbur Smith and Associates. Most of the recommendations from the 1995 study were incorporated into the TDM Program, although some, including paid parking, were not implemented. FMF is responsible for developing an updated Traffic Management Plan as part of this EA process, with a flexible structure based on programmatic requirements and the ability to implement paid parking. Paid parking, as noted above, has always been among the array of options for the NPS and FMF to implement; however, it has not been a strategy that was ever employed and one that the NPS alone could not easily implement because of federal restrictions. With FMF assuming greater responsibilities under the Preferred Alternative, the potential to implement this strategy increases in order to ensure adequate parking for visitors and people working at the FMC and to generate revenues for some of the necessary improvements. If the lease is phased, NPS may permit or license FMF to implement paid parking in advance of lease implementation. If paid parking is implemented, income generated from managing the parking lot would be reinvested into the maintenance and rehabilitation of the FMC.

RESIDENTS AND VISITATION LEVELS

Under the Preferred Alternative, FMF would remain responsible for recruiting residents to the FMC. The current general mix and type of FMC residents would not automatically change under the new lease agreement, although potential renovation of Pier One would increase the

number of tenants that could be housed at FMC. Should new tenant space become available subsequent to Pier One renovation, the FMF would accept applications for new tenants. Existing and new applications would be evaluated based on several factors, including how well the applicant complements the current tenant mix and how the FMC would benefit from each applicant's tenancy. Selection factors also include consistency with the goals of the Fort Mason mission statement and the 1980 General Management Plan.

Visitation to the FMC is expected be lower during the FY 2003 than in recent years due to Pier Two renovation. Construction, which began in March 2003, will last for about two years, affecting visitor levels during FYs 2003, 2004, and 2005. Following renovation of Pier Two, visitor numbers should resemble FY 2002, with small, continuous growth, until renovation of Pier One is complete and all three piers are fully open to visitors.

Should Pier One undergo renovation and be used to host events, the number of visitors at FMC would increase. An order-of-magnitude estimate of the increased visitation can be derived by examining the portion of Pier One that could be allocated to visitor-generating uses and comparing that percentage to the overall space assigned to generating visitors at FMC. Based on rough figures provided by FMF, Pier One, if renovated, could increase the visitor-generating space at FMC by approximately 14.5 percent. At approximately 1.6 million annual visitors currently, the Pier One restoration could raise visitor levels by 232,000 or (after rounding) to 1.9 million annually for the entire FMC.

MAINTENANCE AND CAPITAL IMPROVEMENTS

FMF is currently responsible for minor maintenance and upkeep of the buildings, primarily the interior of the buildings (see Table 3-1). Under the Preferred Alternative, FMF would take over responsibility for major maintenance, renovations, and seismic upgrades for the buildings at the FMC, excluding Building E, the pier substructures, and possibly the seawall and the retaining wall, which are being negotiated as part of the lease. Changes made at the FMC would continue to comply with existing regulations, including Section 106 of the National Historic Preservation Act, the Secretary of the Interior's Standards for Rehabilitation, and the GGNRA Section 106 Programmatic Agreement. The agreement in place was executed in 1992, and an updated Section 106 Programmatic Agreement is being negotiated. All undertakings, including structural modifications, would still be required to undergo the Preservation Assessment (5X) review process to further ensure that changes are consistent with the Center's National Historic Landmark District designation.

Implementation of the long-term lease agreement makes more feasible the funding of seismic upgrades, building restoration, and utility upgrades identified in the 1999 Campus-Wide Assessment. Specific projects that have been identified by FMF as a priority include:

 Restoration and rehabilitation of the Pier Two substructure (underway in spring 2003),

- Restoration and rehabilitation of the Pier Two shed,
- Seismic retrofit and structural repair of the substructures of Piers One and Three,
- Rehabilitation of the Pier One shed,
- Rehabilitation of the Pier Three shed,
- Seismic retrofit of Buildings A through D, the Gatehouse, and Guardhouse,
- Implementation of new facilities standards for interior and exterior improvements,
- Utility infrastructure upgrading,
- Implementation of parking management, and
- Ongoing upgrading of venues and resident spaces.

As with Pier Two, currently being seismically upgraded, the Pier One and Three projects would likely involve structural repair of the piers, replacement of their fender piles and existing utility lines, repair and fiber-reinforced polymer wrapping of concrete caissons.



PROGRAMMING AND INTERPRETIVE ELEMENTS

Under the Preferred Alternative, FMF programming would remain consistent with the 1980 GGNRA General Management Plan and the FMF mission statement. General operations would remain consistent with the past 25 years of Fort Mason's operation as a cultural center. However, with increased revenue sources and the ability to finance work, the likelihood is greater that FMF would implement its Wayfinding and Signage Program. Interpretive elements would remain the responsibility of the NPS.

Public access to the waterfront would continue to be available under the new lease, and visitors to and residents of San Francisco would continue to enjoy access to the waterfront from the Center. The waterfront would continue to be accessible via walking, bicycling, rollerblading, and automobile. The one change from current conditions is that gates would be installed along the aprons of the piers for improved safety and security. These gates would be locked during nighttime hours as unauthorized activities, such as fires, occur late at night along the pier sheds. Because locking the security fence would be restricted to late-night hours, it is not expected that this would interfere with public access to the waterfront, as the vast majority of visits occur during the daylight hours.

WATER TRANSIT AND VESSEL MOORING

Under the long-term lease, the NPS and FMF may explore options for waterborne transportation and/or vessel mooring. The

California State legislature has established the Water Transit Authority (WTA) to develop an improved network of ferry services on San Francisco Bay. The implementing legislation that established the WTA (Government Code Section 66540) directs the Authority to increase regional mobility through the development and operation of a comprehensive water transit system and its associated landside facilities and adjunct services. During its efforts to develop a plan for enhanced ferry services for the Bay Area, the WTA considered a ferry service to Fort Mason as an extension of service from Berkeley to the San Francisco Ferry Terminal. That service is part of the current plan that WTA has put forward for environmental review. The most recent draft (June 2003) of the WTA Program EIR for Expansion of Ferry Service on San Francisco Bay includes off-peak and weekend service to Fort Mason as part of the proposed project. The GGNRA is developing a Water Shuttle Access Plan consistent with the longterm transportation strategy outlined in the 1980 GGNRA General Management Plan and with the former Congressionally-mandated Golden Gate Travel Study (GGNRA, 1977). The goals of the Water Shuttle Access Plan include (1) maintain consistency with GGNRA and applicable regional, state and water transit plans; (2) contribute to improving the Bay Area environment and preserve and protect the park's natural and cultural resources associated with accessing the park; (3) enhance the quality of the visitor experience; (4) increase opportunities for diverse visitor populations to access park sites; and (5) provide cost-effective, reliable and safe water shuttle service. The FMC was identified as a terminal in the Final Ferry Shuttle plan (off-peak and weekend service from the Ferry Building) and will be identified as a hub in the GGNRA Water Shuttle Plan.

In addition to water uses such as ferry or water taxi, temporary or permanent moorings of vessels with complementary programmatic use are possible. The environmental effects of water transit service will be analyzed in subsequent NEPA environmental documentation. Currently, the development of ferry service to FMC is in the planning stage. Neither the WTA nor the GGNRA has the funding to implement such service and if and when the service would be implemented is speculative. Although the use of Fort Mason as part of the Water Transit system is unclear, it is possible that other vessels could use the piers for stopovers.

TROLLEY SERVICE EXTENSION

A long-term transportation improvement, unrelated to the proposed action, but one that would improve access to FMC is the potential extension of MUNI E/F-Line Historic Trolley Service to Fort Mason. The E/F-Line currently extends from the Castro District via Market Street and The Embarcadero to Jones Street in the Fisherman's Wharf area. For many years it has been proposed that this line be extended to Fort Mason via the unused tracks through Aquatic Park and the existing railroad tunnel that exists under the hill on which Upper Fort Mason is located. The concept of a further extension to the Presidio has also been discussed. The Presidio Trust is planning to conduct a

feasibility study of this extension in cooperation with MUNI and the NPS. At the present time, however, there is no commitment or timetable to implement this project. If implemented, it would have a positive impact on transportation access to the FMC by potentially reducing the needs for automobile travel to the site.

NHPA Section 106Programmatic Agreement

Existing regulations and processes established to preserve the historic integrity of the buildings and the Center include Section 106 of the National Historic Preservation Act (NHPA), the Secretary of the Interior's Standards for Rehabilitation, and the GGNRA 1992 Section 106 Programmatic Agreement. The 1992 Section 106 Programmatic Agreement lists categorically excluded undertakings that can be reviewed by Golden Gate historic preservation professionals without going through full Section 106 (NHPA) consultation. While these Categorical Exclusions provide a broad range of undertakings that can be reviewed internally, and thus save a significant amount of review time that would be required for full Section 106 consultation, they do not distinguish between low impact activities and more complicated rehabilitation efforts. Activities within the Categorical Exclusions of the Section 106 Programmatic Agreement are subject to the same review processes, as defined in the 5X process. The Preferred Alternative would include streamlining the Section 106 review process under a new Section 106 Programmatic Agreement that would divide undertakings into three classes:



- 1. Routine, repetitive, or minor maintenance activities, such as repainting the same color, replacing a broken window or graffiti removal
- 2. Occasional more invasive maintenance repair and rehabilitation activities, such as structural stabilization and other rehabilitation for interior tenant improvements
- 3. Major repair and rehabilitation projects, such as seismic upgrades that might include adverse effects or rehabilitation for adaptive use of Pier One that might include adverse effects.

Under the new Section 106 Programmatic Agreement, the first class of activities would require subject matter input from a Golden Gate historic preservation professional on an annual workplan, approved standards, or other program level review but would no longer require the 5X review. The second class, depending on the extent of the maintenance activity, may be subject to the 5X review. The final class of undertakings that have the potential for adverse effects as defined by Section 106 would include streamlined or reduced review periods for the State Historic Preservation Office and the Advisory Council on Historic Preservation and other interested parties at specific points in the project design process but would result in less review time than would be required under full Section 106 consultation.

3.3 Environmentally Preferred Alternative

The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (Section 101(b)). This includes alternatives that:

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



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

The NEPA Council on Environmental Quality explains that the environmentally preferred alternative is "the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." According to the NPS NEPA Handbook (DO 12), through identification of the environmentally preferable alternative, the NPS decision-makers and the public are clearly faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in reaching final decisions. The NPS may also consider the No Action Alternative in identifying the environmentally preferred alternative.

The No Action Alternative would allow limited construction activities at FMC based on its revenues, funds that FMF could raise through grants and other contributions and resources provided by the NPS. Thus, construction-related impacts could occur but are expected to be limited as reported in the assessment contained in Chapter 4 of this EA. Historic structures would continue to deteriorate, absent a funding mechanism to remedy deferred maintenance or undertake seismic retrofits. Already some structures are vulnerable, and continued deterioration could make restoration difficult or impossible. The Preferred Alternative, by contrast, is more likely to maintain the integrity of the San Francisco Port of Embarkation

National Historic Landmark District for the future, by facilitating construction at FMC including the seismic upgrade of Pier One, the maintenance of historic structures, and utility upgrades. The Preferred Alternative would rehabilitate important components of the historic landmark district as well as increase waterfront recreational, educational, and cultural opportunities. The 1980 General Management Plan called for the restoration of the piers for displaying the cultural diversity of the San Francisco Bay Area's communities, for educating the public about the San Francisco Bay marine ecology, and for large special events and for community organizations. The Preferred Alternative would thus better achieve the objective of permitting high standards of living and a wide sharing of life's amenities. Based on the NPS NEPA Guidelines, and the policies and principles of Section 101 of NEPA, the Preferred Alternative is identified as the environmentally preferred alternative. The Preferred Alternative would attain the widest range of beneficial uses of the environment, including historic preservation and visitor experience, without long-term degradation of resources. In addition, it would "preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choices."



3.4 Alternatives Considered But Dismissed from Further Consideration

FMF and the NPS enjoy a successful partnership of more than 25 years that has enabled the FMC to become a national model of the concept of "swords to ploughshares" for its military base conversion and for partnership in an urban park. As a result, the range of alternatives in terms of how or what form the existing cooperative agreement could be modified is limited.

Consideration of a New Cooperative Agreement

Although NPS examined the possibility of negotiating a new cooperative agreement it was dismissed from further consideration. A cooperative agreement will not allow FMF to raise the significant development funds or negotiate the financing required for the preservation and rehabilitation of the Center. In addition, since the rate of deterioration of the facilities is accelerating, and since the NPS has obtained authorization for one of the many seismic retrofit projects required to stabilize the FMC's structures, it is not realistic to believe that the facilities can continue to be used for long under a cooperative agreement.

Lease Negotiations between NPS and Other Organizations

It would not be feasible for the NPS to consider leasing the FMC to other organizations, because the FMF has a single source right to negotiate a new agreement with the NPS for continued occupancy of the FMC. This single source right excludes potential negotiations between the NPS and other organizations. Under the NPS's new leasing regulations, the Department of Interior delegated to the GGNRA the right to lease the facility to FMF on a sole source basis. This decision was based on a 25-year track record of success. Under the existing cooperative agreement, FMF, in partnership with the NPS, has built an acclaimed cultural center and invested over \$18 million in the preservation of the Historic Landmark District.

■ Alternative Site

It would not be feasible for the NPS to consider developing a new urban park at an alternate location. Since the NPS and GGNRA have jurisdiction only over other GGNRA lands, development of a facility that would achieve the General Management Plan would need to be located on GGNRA lands. The 1980 General Management Plan evaluated the characteristics and setting of the GGNRA lands and determined that several locations would be suitable to be developed and managed as urban parks: Crissy Field, Fort Mason, Aquatic Park, Alcatraz, and Sutro Heights Park. Each of these locations has been developed in accordance with the General Management Plan and it is infeasible to relocate



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the facilities and venues at FMC to one of the other urban parks. None of the other parks were considered to be appropriate to accommodate arts and crafts, cultural center activities, and special events. The FMC provides amenities necessary to the FMF's successful operation, such as open architecture for studios and galleries, interesting architecture and convenient access to central San Francisco.

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Chapter 4

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

4.1 Impact Evaluation Methodology

The National Environmental Policy Act (NEPA) requires that environmental documents disclose the environmental impacts of the proposed federal action, reasonable alternatives to that action, and adverse environmental effects that cannot be avoided should the proposed action be implemented. This section analyzes the environmental impacts of the No Action Alternative and the Preferred Alternative on Visitor Experience, Cultural Resources, Traffic, Consistency with Local Land Use Plans, Urban Quality, Water Quality, and Marine Life. NEPA requires consideration of context, intensity, and duration of impacts, indirect impacts, cumulative impacts, and measures to mitigate impacts. NPS policy also requires that potential for impairment of park resources and values be evaluated in environmental documents.

The impact analysis and conclusions were based on information available in the literature, data from park studies and records, and information provided by experts with the FMF, NPS, and other organizations.

■ General Definitions

The following definitions were used to evaluate the context, intensity, duration, and cumulative nature of impacts associated with project alternatives:

Context is the setting within which an impact is analyzed, such as the affected region, society as a whole, the affected interests, and/or a locality. In this EA, the intensity of impacts is evaluated within a local (i.e., project area) context, while the intensity of the contribution of effects to cumulative impacts are evaluated in a regional context (i.e., Bay Area), or in the case of special status species, within the context of a species range.

Intensity is the measure of severity of an impact. The intensity of an impact may be any of the following:

Negligible, when the impact is localized and not measurable or at the lowest level of distinction

Minor, when the impact is localized and slight but detectable

Moderate, when the impact is readily apparent and appreciable



Major, when the impact is severely adverse or exceptionally beneficial and highly noticeable

Duration is a measure of the time period over which the effects of an impact persist. The duration of impacts evaluated in the EA may be either of the following:

Short-term, when impacts occur only during construction or for less than two years

Long-term, when impacts last two years or longer

Based on the above definitions, a significant impact is identified in this EA when the severity, or intensity, of the impact is considered major over a long-term period.

Special Status Species Analyses

In accordance with language used to determine effects on threatened and endangered species under the federal Endangered Species Act (USFWS, 1998), potential effects on special status species are categorized as follows:

No effect, when the proposed actions would not affect special status species or critical habitat

Not likely to adversely affect, when effects on special status species are discountable (i.e., extremely unlikely to occur and not able to be meaningfully measured, detected, or evaluated) or completely beneficial

Likely to adversely affect, when any adverse effect to listed species may occur as a direct or indirect result of the proposed actions and the effect is not discountable or completely beneficial

Remaining considerations concerning special status species, including conclusions and evaluation of cumulative impacts, are present in accordance with the general definitions described above.

■ Cultural Resources Analyses

The assessment of impacts on cultural resources and historic properties was made in accordance with regulations of the Advisory Council on Historic Preservation (36 CFR 800) implementing Section 106 of the National Historic Preservation Act. To provide consistency with the requirements of NEPA, the effects on cultural resources are also described in terminology to describe the duration, intensity, and beneficial or adverse nature of potential impacts. Impacts would be of short term, long term, or permanent duration. Analysis of the duration of impacts is required under NEPA; however, duration is not required and is not usually considered in assessing effects in terms of the National Historic Preservation Act. The intensity of impacts is described as follows:

No Effect, when the impact is barely perceptible and is not measurable. Significant character-defining attributes



of historic properties are not appreciably diminished by the undertaking

Effect, when the impact is perceptible and measurable but the overall impact does not diminish the character defining elements that qualify the property for inclusion in the National Register of Historic Places. Typical effects remain localized and confined to a single element contributing to the significance of a larger National Register property/district

Adverse Effect, when the impact results in a substantial and highly noticeable change in character-defining features of historic properties

4.2 Visitor Experience

Introduction

A critical aspect of a natural or urban park is the experience derived by the visitor—Did the park meet expectations? Was the park enjoyable? Did the park provide a respite? Were there signs and directions to orient the visitor and to explain the natural, cultural, or historical features of the park? This section of the EA describes the existing visitor experience at the FMC and how it might differ under an extension of the Cooperative Agreement and under a new long-term lease. Elements of visitor experience addressed in this analysis include wayfinding and signage, parking, and public access to the waterfront.

Setting

The FMC is part of the GGNRA, one of the largest and most visited urban national parks in the country. GGNRA encompasses 74,000 acres along 28 miles of coastline in San Francisco, Marin, and San Mateo Counties. In addition to the FMC, well known elements of the GGNRA include Alcatraz Island, Muir Woods National Monument, the Presidio of San Francisco, the Marin Headlands, Cliff House, and Fort Point National Historic Site.

FMF is responsible for recruiting and selecting tenants for the FMC, known as "residents." As noted in Chapter 2, Setting, FMC currently houses approximately 36 organizations that occupy about 93,548 square feet of building space. Arts and art-related services occupy more than half of the resident square footage, with fine arts and cultural organizations occupying 50 percent, performing arts organizations occupying 29 percent, and legal services relating to the arts utilizing approximately one percent of available building space. Outdoor recreation, environmental, and animal rights organizations occupy approximately nine percent of FMC's residential space, while other services occupy 11 percent of FMC's residential space. "Other services" include two restaurants and several organizations, such as Marine Exchange (which represents the Bay Area maritime community), Book Bay Bookstore, Friends and Foundation of the San Francisco Public Library, and Ploughshares, a peace-focused public grantmaking foundation.



VISITOR USE

Of the approximately 1.6 million visitors per year visit FMC, most attend events held in the FMC's theater, exhibit halls, or conference center. During Fiscal Year 2002 (FY 2002), the FMF's daily schedule listed a range of 27 to 45 events on typical days and averaged approximately 33 events per day. FMC's six theaters staged over 150 productions during FY 2002, while the Center's museums and galleries mounted over 50 separate exhibits, attracting an estimated 120,000 visitors. Visitors in FY 2003 may decrease, compared to previous years, due to reduced activity at Pier Two, where the pier substructure is undergoing seismic retrofit.

The FMC has an on-site Client Services staff Event Coordinator who coordinates with the Sales and Client Services Departments to plan and implement the appropriate traffic control and parking measures for each event. In scheduling and planning each event, FMC considers the expected attendance, the relationship to other planned events at FMC and elsewhere. If the number of attendees is anticipated to exceed the available parking at FMC, even with valet parking, FMC arranges for off-site satellite parking lots to be available and requires event sponsors to provide shuttle service between the satellite lots and FMC. This effort to direct and orient event-goers contributes to the favorable visitor experience at FMC.

WAYFINDING AND SIGNAGE

Current Signage

As many of the visitors to FMC are first time or infrequent visitors, wayfinding and signage is a very important element to visitor experience. Unlike most national park visitors, those coming to the FMC are most often attending events with a set start time; therefore, it is important for them to arrive at the FMC, locate their destination, and park easily and efficiently. Compared to many national park visitors who are on vacation and have built leisure time into their trip, visitors attending special events at the FMC are less likely to have the luxury of circling around the area, unsure of where to go; therefore, inadequate signage would contribute to visitor stress and diminish the visitor experience.

Signage at the FMC is sparse. Many people who visit the FMC are not aware that it is part of the NPS system or that it is a former military facility. Visitors are often uncertain about the distinction between the FMC and upper Fort Mason, and NPS staff in upper Fort Mason often need to assist visitors and redirect them to the FMC and vice versa. Building entrances are not always marked in a clear manner. Currently, signage is in English. Given that the FMC houses a high number of multicultural museums and hosts multicultural events, it is expected that non-English speaking guests may visit the FMC and it would be useful to include signage that accommodates the needs of a wide range of visitors (Biesek Design 2002).



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Example of directional signage at Fort Mason Center

Roadway access to the FMC is via a single access point located at the intersection of Marina Boulevard and Buchanan Street. A relatively small sign mounted on the northeast corner of the intersection guides visitors to Fort Mason. Between the intersection and Fort Mason, motorists drive through a surface parking lot serves the San Francisco Marina, and the actual entrance to Fort Mason is located at the east end of this parking lot. This two-stage approach, the approach on Marina Boulevard and then access to the desired FMC entry, can also be confusing for visitors, especially in a crowded traffic situation such as a large event.

A wide turnaround area exists immediately inside the Fort Mason entrance. Although this area is provided primarily for a bus stop and turnaround, visitors often take this wide loop looking for parking. This loop passes through major pedestrian access zones, creating potential motorist/pedestrian conflicts. This entrance area is complex and can be confusing to motorists unfamiliar with the site.

WAYFINDING AND SIGNAGE PROGRAM

In 2002, FMF commissioned Biesek Design to prepare a Wayfinding and Signage Program for the FMC. As part of program development, Biesek held a Wayfinding and Signage Charrette as well as solicited comments from visitors to assess the current state of wayfinding and signage at the FMC. The program, which would be implemented by FMF, recommends wayfinding signage for motorists traveling to the FMC, including improved signage along entrance roads and a potential banner row along segments of Laguna Street and Marina Boulevard. In addition, the program includes options for internal signage, including signs differentiating the four parking lots to help visitors remember where they parked. Further elements of the program include a large sign painted on the side of Pier One that would say "Fort Mason Center." This sign would be visible from watercraft on San Francisco Bay in the vicinity of the FMC. Specific recommendations for signage design are included, and sign dimensions, materials, fonts, and colors are intended to enhance visitor orientation and to visually unify the 13-acre site.



Signage at the FMC must comply with standards of GGNRA. In addition, the proposed NPS has proposed nationwide signage guidelines that would need to be considered in future efforts to upgrade FMC's wayfinding and signage elements. Finally, specific improvements to the FMC, including painting signs on the outside of buildings, must comply with the site's status as a National Historic Landmark District.

PUBLIC ACCESS TO THE WATERFRONT

The FMC currently provides excellent opportunities for public access to the waterfront for visitors to and residents of San Francisco. Although, as previously described, the FMC is in need of wayfinding improvements, the site is accessible by pedestrians and bicyclists, and is an element of the greenbelt along San Francisco Bay, including the upper part of Fort Mason, Marina Green, Crissy Field, and the Presidio. Visitors experience includes panoramic scenic views of San Francisco Bay, the Golden Gate Bridge, the Marin Headlands, Alcatraz Island, and Angel Island. These views are visible from many of the FMC's facilities, as well as outside access points. Bayside of Buildings Athrough E is a paved area bordering the bay with a seawall, and the deck aprons of Pier Three, which are accessible to pedestrians. Under normal circumstances, Pier Two's deck apron is also accessible to pedestrians; however, it is temporarily closed during seismic retrofit of Pier Two. Pier One's deck apron is closed and will remain closed until Pier One has undergone seismic retrofit. The FMC does not charge an entrance fee, which enhances public access to the site.

A small percentage of visitors to the FMC are not attending events or visiting the offices of one of the nonprofit organizations. Daily visitors (those that may use the site from time to time) include veterans of foreign wars, who may return to the FMC to share stories and relive memories of shipping out from the Port of Embarkation; runners, who exercise on the stairs located at the southern part of the site; and fishers, who utilize the pier deck aprons. In addition, homeless persons use the restrooms at the FMC.



Fishers utilizing the Fort Mason Center

PARKING

Parking is currently free of charge at the FMC. According to the FMF and as described in greater detail in Section 4.4, Transportation, the parking spaces at FMC are adequate to meet the needs of employees and visitors on 82 to 87 percent of the days of the year. On days when parking is anticipated to exceed demand (i.e., "high impact days"), the FMC Event Coordinator and the event sponsor arrange to have off-site parking available. Provision of free



parking is an amenity and contributes positively to the visitor experience and encourages public access to the waterfront at FMC.



Fort Mason Center parking lots

■ Environmental Consequences

NO ACTION ALTERNATIVE

The No Action Alternative would likely result in a moderate, long-term adverse impact on visitor use and experience if the FMC buildings and piers are eventually closed or partially closed. Should a building or pier collapse during an earthquake, there would be a major, long-term adverse effect on visitor use and experience.

In the short term, visitor experience and public access would not change at the FMC under the No Action Alternative. However, deferred maintenance may be placing the FMC's structures at risk. Pier One has already been vacated for this reason and is currently used only for storage and occasional event support. Without seismic retrofit and renovation, other buildings may also need to be closed to the

public. The buildings are in need of rehabilitation and seismic retrofit, except Pier Two, which is currently being seismically retrofitted, and the Firehouse. Over time, the gradual deterioration of FMC buildings would detract from visitor experience and fewer venues may be available for visitor enjoyment. The NPS has a legislative duty to protect historic structures and may seismically retrofit the structures without a long-term lease; however, the NPS does not have sufficient resources to devote to this issue at this time.

Without seismic retrofitting, Piers One and/or Three could collapse, would be more likely to collapse in the event of a major earthquake, which would cut off waterfront access from these structures. While this would be an extreme scenario, potential collapse of the buildings would have a major adverse effect on visitor experience at the FMC. Short of a major earthquake, it is likely that deferred maintenance would cause portions of buildings to be closed to the public due to public safety concerns. Partial closing of buildings would have a minor adverse effect on visitor experience at the FMC.

Under the No Action Alternative, parking would remain free at the FMC. Since NPS has restrictions on paid parking, in the event that the City of San Francisco initiates charges for the adjacent Marina Green parking, the FMC lot is likely to be filled by people avoiding the paid lot. Therefore, the No Action Alternative could have a minor adverse effect on the visitor experience from an access and parking perspective.



With respect to wayfinding and signage, it is unlikely that either NPS or FMF would have the financial resources to implement the Wayfinding and Signage Program under the No Action Alternative. Incremental changes would be made to wayfinding and signage, as funds become available. However, comprehensive implementation of the program would be difficult under the No Action Alternative.

PREFERRED ALTERNATIVE

The Preferred Alternative would have a major short-term adverse effect on visitor experience, primarily related to construction of projects made more feasible under the long-term lease. However, the Preferred Alternative would have a beneficial long-term effect on visitor experience, as the long-term lease would provide funding to improve public safety, expand maintenance and restoration activities, and rehabilitate the buildings and open Pier One for public use.

Primary activities under the long-term lease that may affect visitor experience include seismic retrofit of Pier One and subsequent opening of the Pier for public use, seismic retrofit of Pier Three, construction activities associated with seismic retrofit and structural rehabilitation of other facilities at the FMC, and implementation of paid parking.

Construction Activities. Construction activities would interfere with activities, classrooms, performances, and enjoyment of exhibits. Noise, dust, and construction equipment and vehicular movement would detract from the visitor experience. Nonetheless,

construction activities can be restricted to avoid interrupting major events or performances. Given the sporadic and intermittent nature of construction activities, these effects could have moderate to major effects but would be short term.

Crowds. In the long term, renovation of Pier One could increase visitor levels to the FMC by approximately 14.5 percent annually, an increase of 232,000 visitors per year. When thinking of national parks, most people think of large tracts of parkland located in wilderness areas, such as the Grand Canyon National Park in Arizona, Yosemite National Park in California, or Everglades National Park in Florida. Visitors to these parks expect wilderness experiences, including observation of natural ecosystems and viewing of native plant and animal species. In these parks, increases in visitorship can be perceived negatively because overcrowding can interfere with the enjoyment of nature. However, because the FMC is an urban national park, and visitors do not go to the FMC for an isolated wilderness experience, an increase in visitors of this magnitude would not adversely affect visitor experience with respect to overcrowding. The majority of visitors go to the FMC to attend events, such as fairs and concerts, where large numbers of people are part of the visitor experience. In addition, the FMF is responsible for scheduling events such that they do not cause overcrowding at the FMC. Thus, the increase in visitor levels and activities expected under the Preferred Alternative would not be negatively perceived by other visitors at FMC.



Parking Fees. The imposition of parking fees is more likely to affect FMC employees (employees of FMF and resident organizations) and would have a lesser effect on visitors to FMC (see Section 4.4, Transportation, of this EA for an explanation). Fort Mason is one of only a few remaining visitor-oriented venues in San Francisco that does not charge a parking fee and, although most NPS sites nationwide do not charge for parking, many charge an entrance fee.

Certain visitors are more likely than other visitors to be affected by the implementation of paid parking. The most likely group of parkers to be affected would be persons who park at FMC for purposes other than visiting facilities or events at FMC. These parkers include weekday commuters who park at FMC to access public transit or use the FMC as a staging point for carpooling, and persons who park in the area to visit other nearby uses. The loss of free parking for this use is not considered an adverse effect to FMC visitor experience. Implementation of parking fees would discourage parking by persons not visiting the FMC.

In contrast, visitors who are attending events or classes at FMC would be affected if they had to pay for their stay. The significance of the impact depends largely on the specifics of the paid parking arrangement. For example, if rates for short-term parking are relatively steep, visitors may be inconvenienced, thereby detracting from their experience. On the other hand, if short-term parkers are allowed to visit for free, then this fee structure would have minimal effect on the daily visitors. Another potential

arrangement would be for FMF to charge parking fees for large events only. Visitors to large events such as concerts and fairs generally expect to pay for parking, and likewise would not be significantly affected by the implementation of paid parking.

Overall, parkers most affected by paid parking at FMC are individuals who do not visit the FMC but take advantage of the free parking. The loss of free parking for this group would not detract from the park visitors' experience, since this group does not use the park. Parkers who attend events or performances would be inconvenienced, but this group is accustomed to being charged for parking, since most other visitor-oriented venues impose parking charges. As a result, the impact of paid parking on this group would be considered negligible to moderate. Parkers who attend short duration classes or lectures or a just visiting to reminisce may or may not be affected, depending on how the parking rates are negotiated. Given these groups of parkers and the fact that the majority of visitors to FMC enjoy programs that would charge for parking if held at other venues, the effect of paid parking on the visitor experience would be noticeable, but not considered a major impact.

Wayfinding and Signage. Under the Preferred Alternative, FMF would remain responsible for implementing the Wayfinding and Signage Program. The long-term lease, as noted previously, would bolster the FMF's fundraising and financing potential and better enable FMF to implement the improvements recommended in the Wayfinding and Signage Program. This increased likelihood of



implementing the Wayfinding and Signage Program is a beneficial effect of the Preferred Alternative.

Public Access. The Preferred Alternative would not propose substantial changes to public access to the waterfront. Fishers, recreationalists, visitors wishing to take in breathtaking views, and educational groups would continue to be able to come to FMC to enjoy the waterfront, except during those periods when construction may be occurring. The potential seismic retrofit of Piers One and Three, which becomes more feasible with the long-term lease, would attract even greater numbers of visitors to the waterfront. The Preferred Alternative would restrict waterfront access during the late night hours with the installation of fencing around the aprons of the piers. This proposal is being considered for security reasons, as unauthorized activities, such as fires, occur late at night along the pier sheds. Because locking the security fence would be restricted to late-night hours, it is not expected that this would interfere with public access to the waterfront, as the vast majority of visits occur during daylight hours. The benefits of preserving the park for recreational, cultural, and educational purposes, enhancing wayfinding and signage, and reusing Pier One under the Preferred Alternative far outweigh the restrictions imposed late at night for security reasons. As a result, the long-term lease would have a beneficial effect on public access and continue to promote a positive visitor experience at FMC.

Overall, the Preferred Alternative would enable the FMF to pursue improvements at FMC that would enhance visitor experience, a long-term beneficial consequence.

Mitigation Measures

No mitigation measures are required for either alternative in terms of long-term effects on visitor experience. To reduce effects during the short-term construction periods under either alternative, Pier 2 EA mitigation measures identified in the Environmental Screening Form are applicable to both alternatives. These mitigation measures, which would limit dust emissions and construction equipment noise that can detract from the visitor experience, are included as Appendix E, Pier 2 Mitigation Measures, of this EA.

Cumulative Impacts

Future projects at the FMC include seismic strengthening of structures and upgrading various life safety systems. Some of these activities may have overlapping construction schedules, which would cause a minor short-term cumulative impact related to the visitor experience. This impact could be mitigated to some extent with careful project planning and proper notification of resident organizations, businesses, employees, and visitors.

■ Impairment of Park Resources

Neither the No Action Alternative nor the Preferred Alternative would impair park resources and values in a manner that would adversely affect visitor experience. Over time,



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however, the inability of the NPS under the No Action Alternative to arrest the gradual deterioration of the exteriors of the FMC buildings and of the utility systems would result in buildings being closed off to public access for safety reasons. The loss of these buildings and areas and the visible disrepair of other facilities could slowly lead to an impairment of park resources. By contrast, the Preferred Alternative would enable the FMF to repair and restore buildings experiencing deferred maintenance, and consequently unlike the No Action Alternative, would not be expected to result in an impairment of park resources.

4.3 Cultural Resources

■ Introduction

This section of the EA addresses potential cultural resources issues. The project site is part of a National Historic Landmark District, and, as such, alterations or improvements to the site are subject to close scrutiny to ensure that the modifications are consistent with the characterdefining elements and preservation standards and guidelines that govern the Fort Mason complex. The setting discussion provides an overview to the historical significance of the site and to past efforts to preserve the grounds and facilities at the former military base. In addition, a review of the existing protocols, standards, and review processes that are in place to protect cultural resources is presented. Future changes to the FMC that may occur as a result of the NPS and FMF entering into a long-term lease are then evaluated for their effects on the cultural resources at the site. Such changes may include seismic retrofit of existing structures, renovation, and reuse of Pier One, and utility upgrades. The determination of potential cultural resource effects from these changes is based on Sections 106 and 110 of the National Historic Preservation Act, which also calls for avoiding and/or minimizing impacts, or formulating mitigation measures for consequences considered to be an adverse effect.

■ Setting

HISTORICAL OVERVIEW

Fort Mason is an important national cultural resource, as recognized by its inclusion in the National Register of Historic Places and by its designation as a National Historic Landmark District. Prior to becoming Fort Mason in 1882, the site served as the "Post at Point San Jose," a fortified military base established in 1863 to defend against a Confederate attack. In the aftermath of the Civil War, the post became the headquarters of the 9th Infantry Regiment, a nonartillery role. During the 1906 San Francisco earthquake, the fort became a refugee camp and Army Relief Headquarters for survivors of the quake.





Soldiers departing from Fort Mason

U.S. MILITARY HISTORY AND USE

The FMC was developed originally as a U.S. Army facility known as the San Francisco Port of Embarkation. Between 1910 and 1915, the U.S. Army filled in the shallow cove along the site's waterfront and constructed three large piers that extend into San Francisco Bay and four concrete, two-story warehouses. Designed by the architectural firm of Rankin, Kellogg, and Crane of Philadelphia, the warehouses and pier sheds were among the first army structures in the San Francisco Bay Area built in the Mission Revival style and are considered excellent examples of military architecture of national importance. The San Francisco Port of Embarkation was established at Fort Mason in 1932. The entire site is recognized for its significant contribution to local and U.S. history:

The Fort Mason military reservation is significant as a historic district. Commencing in 1797 and lasting through the Spanish and Mexican administrations of Alta California, Fort Mason was one of two sites in San Francisco Bay that was armed with artillery for defense of the harbor. For more than forty years under the American administration, it played a role in the coastal defense of the bay for the Civil War to post-Spanish-American War. From the Spanish-American War to the Korean Conflict, Fort Mason's role as the headquarters of the San Francisco Port of Embarkation was of national significance. Through it moved millions of men and millions of tons of supplies, providing evidence of the United States' expansion and growing interests in the Pacific (NPS, Historic Structure Report 1991).



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Historic view of Pier One

In summary, from 1910 until its abandonment by the Army in 1963, Fort Mason served as the Army's major West Coast point of embarkation for American military personnel in the Pacific during both wartime and peacetime.

URBAN NATIONAL PARK

Following the conclusion of World War II and the Korean conflict, the advent of air transport made the function of Fort Mason obsolete and because of neglect and disrepair, the grounds and structures began to deteriorate. Partially in recognition of the need to protect the site from further disuse, Congress passed legislation in 1972 creating one of the first urban national parks, the GGNRA, which includes Fort Mason and the 13-acre FMC. While recognizing its historic and scenic value, a 1975 NPS study determined that the unoccupied structures of the FMC area were subject to vandalism and deterioration. Moreover, the GGNRA lacked both the funds and the expertise to restore and develop the FMC facilities to the standards required by the National Historic Preservation Act of 1966.

In response to the need to protect the buildings and to fulfill the 1972 legislative mandate, the FMF was created in 1976 to convert the former military buildings into a cultural and recreational resource for the San Francisco Bay Area. FMF assumed responsibility for the administration, development, interior maintenance, and renovation of FMC, while the GGNRA retained responsibility for exterior maintenance and security. The partnership between the GGNRA and FMF provided a way for the NPS to address the deterioration of the buildings without increasing funding or staffing at the GGNRA. In January 1977, FMC opened a broad range of activities to the public, from performing and visual arts to environmental concerns and wilderness adventures.

To assure that future development and recreational pursuits at the GGNRA remained consistent with the spirit intended by Congress when it created the park, the NPS prepared and adopted a General Management Plan in 1980 for the GGNRA. The overriding management objectives defined by the NPS were:

- Preservation and restoration of natural resources,
- Preservation and restoration of cultural resources,
- Making the recreation area readily available to the broadest variety of park users,



- Provision of a broad variety of park experiences, and
- Consideration of park neighbors.

Specific to FMC, the General Management Plan promotes the pier and warehouse area as the center of attention in acknowledgment of "the obvious appeal of the bayshore, the imposing stature of the buildings, and the attractive programs they will contain...Here the cultural color and diversity of the people of the San Francisco Bay Area will be revealed -in theaters, studios, workshops, galleries, and classrooms imaginatively created within one pier building and two or more warehouses" (NPS 1980). The other pier structures were envisioned to house programs concerning San Francisco Bay marine ecology and a multipurpose facility for large special events or community organizations for indoor recreational activities.

The programs, organizations, and events sponsored and managed by FMF have honored and respected the management objectives and development concepts articulated in the General Management Plan. As well, the cooperative agreement, under which FMF currently administers FMC, speaks directly to the mandates of fulfilling the legislative purpose of Golden Gate National Recreation Area and of preserving the area's historic, natural, and recreational qualities (NPS 1984).

HISTORIC RECOGNITION

In recognition of Fort Mason's role in U.S. history and the Mission Revival architecture of the warehouses, the site was nominated for

inclusion in the National Register of Historic Places in 1985. The National Register Nomination Form (NPS, 1985) recommending inclusion of Fort Mason provides details on the site's historical significance:

During the early months after the United States entered World War II, the U.S. Army's San Francisco Port of Embarkation (SFPE) shipped more military supplies than all other military the ports in United States combined...Between December 1941 and August 1945, 1,745,000 personnel embarked at San Francisco. In addition, more than half a million veterans of the war debarked at San Francisco during the same period. An equal number came home through the Golden Gate after the conclusion of hostilities. All American dead being returned to the United States from the Pacific were returned through the Port. Japanese and German prisoners-of-war were processed through its facilities. More than 5 million measurement tons of cargo were shipped through San Francisco.

Fort Mason was designated a National Historic Landmark on February 4, 1985 (National Register No. 85002433). The National Historic Landmarks program is administered by the NPS.

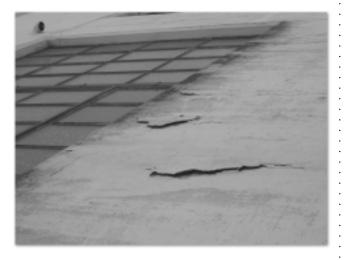
EXISTING PHYSICAL CONDITIONS

In 1999, the NPS and FMF funded a Campus Assessment, the purpose of which was to evaluate the conditions of the exterior, structure,



systems, and common public areas of buildings, piers, and infrastructure at the FMC. While creation of the GGNRA and the appointment of FMC as the facilities manager, in particular, was instrumental in staving off the disuse and disrepair besetting many of the structures, there still are ongoing maintenance and upkeep concerns. The principal concerns and the focus of the Campus Assessment were:

- The need for seismic improvements to buildings and piers,
- Issues related to compliance with Americans with Disabilities Act and with building codes,
- General deferred maintenance problems, and
- Utility systems upgrades.



Spalling concrete on Fort Mason Center building exterior



Another example of spalling concrete on Fort Mason Center building exterior

The assessment concluded that the physical conditions at FMC are relatively good. The recommended improvements "primarily have to do with sustaining the Fort Mason Center as a historic landmark and public amenity well into the future, consistent with the length of the Cooperative Agreement" (Tanner Leddy Maytum Stacy Architects 1999). Improvements to Buildings A through E, the three piers, the Firehouse, Gatehouse, Guardhouse, Shed Building, utilities, and site work were divided into four categories: near-term priority nonseismic, seismic upgrade of piers, seismic upgrade of nonpier buildings, and long-term priority improvements. The Campus Assessment is noteworthy with respect to historic



preservation in that a wide range of maintenance and improvement projects were identified, many of which could affect the historic integrity of the National Historic Landmark.

Since 1999, the NPS and the FMF have initiated work on the seismic upgrade of Pier Two. In addition, FMC was awarded in 2002 a prestigious and highly competitive matching grant from Save America's Treasures, targeted for nationally significant properties, to weatherproof the Pier One building.

ARCHEOLOGICAL RESOURCES

As described in the Pier 2 Seismic Retrofit and Structural Repair Project Environmental Assessment, San Francisco Bay is known to contain a variety of submerged archeological resources, including scuttled ships and other ships that ran aground and became shipwrecked. As noted earlier, the small cove just off FMC was filled by the U.S. Army in the early 1900s. Prehistoric archeological resources are not expected in the project area, because the scouring of the bedrock formation during the inundation of San Francisco Bay would have likely erased evidence of the aboriginal use of the area. Furthermore, no evidence of submerged cultural resources, based on a record search of the State Land's Commission's Online Database Shipwrecks (http:// shipwrecks.slc.ca.gov), an assessment of GGNRA and other federal holdings (Delgado and Haller 1989), and archival review of the San Francisco Maritime Museum.

HISTORIC PRESERVATION STRATEGIES AND PROTOCOLS

Given the historic nature of FMC, actions undertaken by the NPS and the FMF are governed by Sections 106 and 110 of the National Historic Preservation Act. These sections stipulate the need to assess federal actions for potential effect on properties on or eligible for inclusion in the National Register of Historic Places and to avoid and/or minimize impacts, or develop mitigation measures in the event that a potential adverse effect may result to the historic resource. The entire site is part of the San Francisco Port of Embarkation National Historic Landmark District, and changes to the site or to the buildings must be consistent with the maritime function of the site. In order to ensure the preservation of the site's historic status, the NPS has developed protocols for the conservation and adaptive re-use of the structures and the grounds. Specifically, the NPS, the California Historic Preservation Office, and the Advisory Council on Historic Preservation entered into a Section 106 Programmatic Agreement in 1992 that details the procedures that must be followed for modifications proposed at FMC. A new Section 106 Programmatic Agreement is being negotiated concurrently with this EA and the lease negotiations.

In implementing the provisions of the Section 106 Programmatic Agreement, a "Preservation Assessment (5X) Form" was created to review projects with the potential to affect cultural properties in Golden Gate National Recreation Area. The form requires:



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- Supporting documentation about the proposed modifications,
- The cultural resource potentially affected,
- The reasons for undertaking the modification,
- The measures planned to minimize effects, the standards and guidelines to be followed in completing the work (e.g., the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings), and
- Certification by appropriate cultural resource specialists that the proposed modification is consistent with NPS management policies or U.S. Department of Interior standards and guidelines and incorporates measures to avoid adverse impacts.

The five signatories to the Preservation Assessment Form (hence, the name "5X" review process) are the Park Archeologist, the Park Curator, the Park Historical Architect, the Park Cultural Landscape Architect, and the Park Historian. Completion of the form is intended to comply with Section 106 documentation requirements to address potential effects and measures to minimize harm.

The 1992 Section 106 Programmatic Agreement has a list of categorically excluded undertakings

that can be reviewed by Golden Gate historic preservation professional without going through full Section 106 consultation. While these Categorical Exclusions provide a broad range of undertakings that can be reviewed internally, and thus save a significant amount of review time that would be required for full Section 106 consultation, they do not distinguish between low impact activities and more complicated rehabilitation efforts. All activities in the Categorical Exclusions portion of the Section 106 Programmatic Agreement are subject to the same review processes, as defined in the 5X process.

■ Environmental Consequences

NO ACTION ALTERNATIVE

The No Action Alternative could jeopardize the historic integrity of the Fort Mason Historic Landmark District through continued deferral of necessary maintenance. Failure to provide the necessary upkeep of the historic structures and grounds could have an adverse effect on this significant cultural resource.

Under the existing Cooperative Agreement, changes to FMF with any potential to affect cultural resources would continue to be governed by the 1992 Section 106 Programmatic Agreement among the NPS, the California Historic Preservation Office, and the Advisory Council on Historic Preservation. As a result, potential improvements or modifications to the interior spaces, building or pier exteriors, or to the site would be subject to the 5X process, and consequently, cultural resources at FMC would be protected.



The above notwithstanding, the 1999 Campus Assessment identified a number of long-term priority improvements, as well as costly seismic upgrades to the piers. The existing Cooperative Agreement is due to expire in 2004, at which time it is assumed under this alternative that the NPS would extend the agreement if another arrangement is not in place. Under the Cooperative Agreement, the NPS would retain responsibility for upkeep of the structures; however, given the limited budget for activities at Fort Mason, it is not anticipated that NPS would be able to adequately maintain or restore the historic buildings. As a result, the buildings would likely continue to suffer from deferred maintenance. At present, the rate of deterioration of some facilities is rapidly accelerating, placing certain structure at risk. It is reasonable to expect that some of the nearterm priority improvements and some of the more costly pier retrofits identified in the 1999 Campus Assessment would continue to be deferred. While the overall physical status of the Fort Mason National Historic Landmark is "satisfactory," deferred maintenance would eventually begin to jeopardize that status. Thus, the No Action Alternative could have an adverse effect on cultural resources at the FMC due to inaction, known as benign neglect, rather than due to a potential alteration or upgrade, which would be governed by the 5X process and ensure compliance with Section 106 of the National Historic Preservation Act.

Under the No Action Alternative, the existing 1992 Section 106 Programmatic Agreement for the FMC would remain in effect and continue to stipulate the required review procedures for various alterations to the site and the need for

measures to minimize harm should any of the proposed alterations result in an adverse effect to the FMC's historic character. Those alterations that qualify as Categorical Exclusions would still be subject to the same review processes, as defined in the 5X process, regardless of whether they were routine, maintenance activities or more complicated rehabilitation projects. Undertakings that have an Adverse Effect would continue to remain outside of the Section 106 Programmatic Agreement and require full Section 106 consultation.

PREFERRED ALTERNATIVE (LONG-TERM LEASE)

The Preferred Alternative would have the beneficial effect of enabling FMF to initiate fundraising and development activities that, in turn, would help finance building code compliance and deferred maintenance. This investment in the physical plant of FMC would have a beneficial effect on preserving the historic integrity of the site. The new Section 106 Programmatic Agreement proposed by the NPS would define specific review timeframes by the historic resource agencies for major rehabilitation projects, which currently do not exist. This revision to the Section 106 Programmatic Agreement would have a beneficial effect because buildings at risk would be acted upon within a defined timeframe rather than left to an indeterminate review process.

A long-term lease would replace the existing cooperative agreement between the NPS and FMF under the Preferred Alternative. The lease would shift responsibility for maintenance of building exteriors and the site to FMF from the NPS (except that the NPS would retain



responsibility for the pier substructures. As previously noted, responsibility for the seawall and the retaining wall is being negotiated as part of the lease). While the lease, thus, places a greater financial burden on FMF, the lease would also provide FMF with the financial and administrative means to continue operating FMC and to invest in needed facilities and capital improvements, including utility system upgrades. As a result, the principal concerns identified in the 1999 Campus Assessment are more likely to be addressed under the proposed lease. Problems of deferred maintenance, building code compliance, seismic retrofit, and utility improvements are more readily remedied because of the increased revenue, fundraising, and financing opportunities that are possible with the long-term lease. The improvements have the potential to adversely affect the Historic Landmark District, but the existing Section 106 Programmatic Agreement or the proposed new Section 106 Programmatic Agreement and the implementing 5X review process would safeguard against this potential effect. Given the requirement to complete the 5X review process and assure compliance with Section 106, these improvements made to the physical conditions of the buildings and site at FMC would have a beneficial effect on maintaining and preserving the historic integrity of the individual buildings and the site.

The Preferred Alternative includes a new Section 106 Programmatic Agreement to supersede the 1992 Section 106 Programmatic Agreement. Currently, virtually any interior or exterior alteration to FMC is required to undergo 5X review. Thus, a routine, repetitive maintenance

activity such as painting warrants the same level of review as a major one-time rehabilitation project. The 1992 Section 106 Programmatic Agreement has a list of categorically excluded undertakings that can be reviewed by Golden Gate historic preservation professionals without going through full Section 106 consultation. While these Categorical Exclusions provide a broad range of undertakings that can be reviewed internally, and thus save a significant amount of review time that would be required for full Section 106 consultation, they do not distinguish between low impact activities and more complicated rehabilitation efforts. All activities under the Categorical Exclusion list would still be subject to the same review processes, as defined in the 5X process. Undertakings that may have an Adverse Effect fall outside of the Section 106 Programmatic Agreement and revert to full Section 106 consultation. The proposed action would include streamlining the Section 106 review process under a new Section 106 Programmatic Agreement that would divide undertakings into three classes:

- Routine, repetitive, or minor maintenance activities, such as painting the same color, replacing a broken window or graffiti removal
- Occasional more invasive maintenance repair and rehabilitation activities, such as structural stabilization and rehabilitation for interior tenant improvements



Major repair and rehabilitation project, such as a seismic upgrade that may have an adverse effect or rehabilitation for adaptive use of Pier One that might include adverse effects

Under the proposed action, the first class of activities would require subject matter input from a Golden Gate historic preservation professional on an annual workplan or other program-level review but would no longer require the 5X review. The second class, depending on the extent of the maintenance activity, would continue to be subject to the 5X review. The final class would include streamlined or reduced review periods for the State Historic Preservation Office and the Advisory Council on Historic Preservation and other interested parties at specific points in the project design process but would result in less review time than would be required under full Section 106 consultation.

In the absence of 5X review for the first class, or "lesser" impact activities, one consequence may be that some improvements could be made that are not consistent with the historic character and status of FMC. This potential effect, however, would not likely occur, because a Golden Gate historic preservation professional would review "program" level workplans and because changes to the facilities or the grounds would still be governed by the Secretary of the Interior's Standards for Rehabilitation, the Park Partners Handbook, the Project Managers Handbook, the Presidio Tenant Standards, the Historic Structures Report, Guidelines for Outdoor Furniture, and the FMF's own interior

standards. All of these guidelines and standards exist to protect the FMC as a national treasure and are consistent with the Secretary's Standards.

Until the new Section 106 Programmatic Agreement has been signed, the existing Section 106 Programmatic Agreement would remain in effect. Accordingly, while the new Section 106 Programmatic Agreement is being negotiated, there would be no difference from existing conditions and the current mechanisms to ensure compliance with Section 106 of the National Historic Preservation Act. The new Section 106 Programmatic Agreement proposes to provide streamlined (and definitive) review times for the class of undertakings that could result in adverse cultural resources impacts (i.e., renovation of Pier One and seismic upgrades of Piers One and Three), rather than reverting (as described in the 1992 Section 106 Programmatic Agreement) to the Federal Regulations governing full Section 106 consultation. Since there is no timeline under these regulations, it is possible that an adverse effect could require months to years in consultation time. The new Section 106 Programmatic Agreement has the potential effect of limiting this consequence.

MITIGATION MEASURES

The deferral of maintenance activities at FMC would over time jeopardize the structures and the features that contribute to their designation as a National Historic Landmark. The following mitigation measures would help reduce the deterioration of the historic structures due to deferred maintenance under both alternatives.



The feasibility and success of the first measure is greater, however, under the Preferred Alternative. The absence of a long-term lease under the No Action Alternative creates a sense of uncertainty among financial lending institutions and the philanthropic community. Thus, the ability to raise substantial funds to address maintenance issues identified in the 1999 Campus Assessment and protect the cultural resources under the No Action Alternative is more speculative.

Mitigation Measure 1

Fundraising and Philanthropic Donations for Historic Preservation. Fundraising efforts by FMF could help defray some of the anticipated costs for upkeep of the Historic Landmark District. In 2002, FMF received \$80,000 from ArtHouse through its Emergency Property-Related Subsidies Program, enabling upgrades to Cowell Theater. In addition, FMF in partnership with the Golden Gate National Recreation Area was the recipient of a \$341,000 Save America's Treasures Grant. The year 2002 also marked the initiation of FMF's Historic Preservation Fund that has raised over \$100,000 to date. The NPS would collaborate with the FMF to maintain an ongoing effort to raise funding in support of correcting deficiencies identified in the 1999 Campus Assessment. The NPS and FMF would each be responsible for identifying potential funding sources and grants and jointly establishing an annual workplan for fundraising activities and priorities.

Mitigation Measure 2

Restrictions on Major Rehabilitation Projects until Adoption of New Section 106 Programmatic Agreement. *Until the* Section 106 Programmatic Agreement is adopted, the existing 1992 Section 106 Programmatic Agreement would remain in effect. The 1992 Section 106 Programmatic Agreement covers maintenance and repair activities undertaken by the FMF that would fall into the proposed Class I and Class 2 improvements under the new agreement. Under the existing Section 106 Programmatic Agreement, improvements would continue to undergo the 5X process, which would assure attainment of the historic preservation standards. The Class 3 major rehabilitation projects that would become the responsibility of the FMF under the Preferred Alternative are not covered by the existing agreement and require full Section 106 consultation. Major rehabilitation Class 3 projects that could have an adverse effect on an historic resource may not begin until the new Section 106 Programmatic Agreement has been adopted and the Section 106 consultation process for the proposed action completed. This measure would assure that these buildings and other facilities do not enter a review process that is indeterminate, which could cause them to experience further disrepair.



CUMULATIVE EFFECTS

None of the projected projects would adversely affect historic resources within the San Francisco Port of Embarkation National Historic Landmark District. Historic Resources are protected under Section 106 of the Historic Preservation Act and the Section 106 Programmatic Agreement. This alternative would not therefore contribute to a cumulative effect on historic resources.



Historic view of Fort Mason Center Piers

■ Impairment of Park Resources

The No Action Alternative has the potential to impair park resources because it would not provide a reliable mechanism to enable the NPS to maintain the historic buildings at FMC. Benign neglect over time could lead to the loss of the integrity of the historic district, which could lead to an impairment of important resources at the GGNRA. Continued deferred maintenance of the Historic Landmark District buildings could threaten their integrity. By contrast, the Preferred Alternative would enable

the NPS through the FMF to finance the necessary improvements that would avoid impairing park resources.

4.4 Transportation

■ Introduction

This section of the EA addresses access, circulation, and parking at FMC. Potential onsite and off-site transportation and parking impacts of the No Action Alternative and the Preferred Alternative are discussed. With the Fort Mason Center Long-Term Lease (the Preferred Alternative), two potential improvements, the renovation of Pier One and the implementation of parking fees, would have noticeable changes to access and parking at FMC. The issues related to the development of Pier One include the transportation impacts of an increased resident population and an increase in the number of visitor-oriented events. These changes could result in increased traffic and parking demands in the area, which may affect visitor experience and disturb the adjacent Marina residential neighborhood. The FMC has an existing Transportation Demand Management (TDM) Program that has proven effective in controlling the impacts of the broad range of visitor events. Under the Preferred Alternative, the TDM could be expanded to include the implementation of paid parking as both a parking management tool and a source of revenues. Paid parking may financially affect the residents (tenant organizations) and visitors of the FMC and may create off-site parking impacts.

Setting

TRANSPORTATION

Vehicular Access

FMC is located along the northern bay front of San Francisco between the Fisherman's Wharf/ Aquatic Park area and the Presidio. To access FMC from the North Bay, drivers can use the Golden Gate Bridge and Doyle Drive to the Marina Exit and Marina Boulevard. From the South Bay, drivers can use US 101 to the Ninth Street Exit or the Mission Street Exit and travel north on Franklin Street or Van Ness Avenue to Bay Street, Buchanan Street, and Marina Boulevard. From the East Bay, drivers can use the San Francisco-Oakland Bay Bridge to the Fremont Street Exit and travel east on Howard Street and north on The Embarcadero to Bay Street, Buchanan Street, and Marina Boulevard, or use the Ninth Street Exit and travel north on Franklin Street to Bay Street, Buchanan Street, and Marina Boulevard.



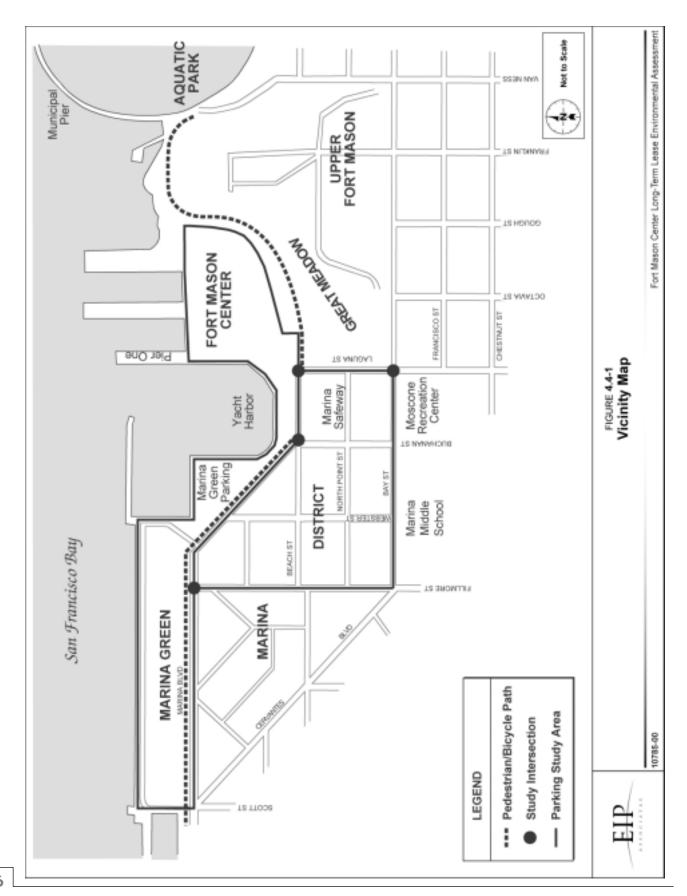
Intersection outside Fort Mason Center entrance (facing west on Marina Boulevard)

Primary access to the FMC is provided by Marina Boulevard to the west, Franklin Street and Van Ness Avenue to the south, and Bay Street to the east (see Figure 4.4-1). Roadway access to FMC is via a single access point located at the intersection of Marina Boulevard and Buchanan Street. At this location a single entrance and exit is provided for vehicular access at the northern leg of the intersection of Marina Boulevard and Buchanan Street, opposite the Marina Safeway store. The intersection is controlled by traffic signals. A relatively small sign mounted on the northeast corner of the intersection guides visitors to FMC. Between the intersection and FMC, motorists drive through a surface parking lot that is owned and maintained by the City of San Francisco and serves the city yacht harbor.

The actual entrance to Fort Mason is located at the east end of this parking lot. The entrance provides a single travel lane that is separated from the single-lane exit by approximately 40 feet. Within this separation are a wall and a gatehouse structure. As shown in Figure 4.4-1, a wide turnaround area is provided immediately inside the FMC entrance. This area is provided primarily for a bus stop and turnaround serving the City of San Francisco MUNI line number 28. This entrance area is complex and can be confusing to motorists unfamiliar with the site. FMC staff reported that there is also a need to improve the lighting, pavement markings, and channelization of the parking lots at FMC. To help address these issues, FMF had a consultant prepare a Wayfinding and Signage Program, but funds are not available at this time to implement the program.

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT







FORT MASON CENTER

LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT



Bus turnaround at Fort Mason Center

Typically, intersection operating conditions are evaluated for the weekday P.M. peak hour. However, the peak activity at the FMC traditionally occurs on weekends. To account for both scenarios, both weekday and Saturday peak hour traffic conditions were evaluated. Traffic counts were conducted on a weekday afternoon and on a Saturday afternoon. The data from these counts were analyzed to determine the peak hour for traffic flow during these time periods. The intersection operating conditions were evaluated for the weekday P.M. peak hour (generally between 5:15 and 6:15 P.M.) and the Saturday midday peak hour (generally between 12:30 and 1:30 P.M.).

Four intersections were selected for evaluation during both time periods: Marina/Fillmore, Marina/Beach/Buchanan, Beach/Laguna and Bay/Laguna. These intersections were considered to be most likely to be affected by vehicles destined to and from FMC and include the intersections adjacent to the project site, plus those along the major access routes.

Operating characteristics of intersections are described by the concept of Level of Service (LOS). Intersection LOS is a qualitative description of an intersection's performance, based on the average delay per vehicle. Intersection levels of service range from LOS A, which indicates free-flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. Within San Francisco, LOS A through D are considered acceptable, and LOS E and F are considered unacceptable.

The intersection operating conditions were evaluated using the 2000 Highway Capacity Manual methodology, which is the standard analysis methodology for the San Francisco Planning Department. For signalized intersections, this methodology determines the capacity for each lane group approaching the intersection. The level of service is based on the average delay (in seconds per vehicle) for the various movements within the intersection. A combined weighted average delay and LOS is presented for the intersection.



Table 4.4-1 presents the results of the intersection LOS analysis for the existing weekday P.M. peak hour and Saturday midday peak hour conditions. Currently, the four study intersections operate at LOS B or C, except the intersection of Bay/Laguna, which operates at LOS D during the weekday P.M. peak hour.

PARKING

Inside the FMC entry gate, there are a total of 450 surface lot parking spaces. With the exception of 13 spaces designated for accessible parking for persons with disabilities, there are no parking restrictions on the use of these spaces and there is no charge for parking. Resident organizations and visitors to the FMC can use the spaces. However, when events are scheduled that are anticipated to create parking demand in excess of the supply, one parking management strategy employed by the FMF is to utilize valet parking to increase parking capacity. The FMF has identified four specific

on-site areas for valet parking, and depending on the event size, one or more of these areas are converted to valet parking. In total, these areas provide 230 self-park spaces or 335 valet spaces. Thus, with the use of valet parking the parking capacity at the FMC lots can be increased by 105 spaces to a total of 555 spaces. The valet parking area is shown on Figure 4.4-2.

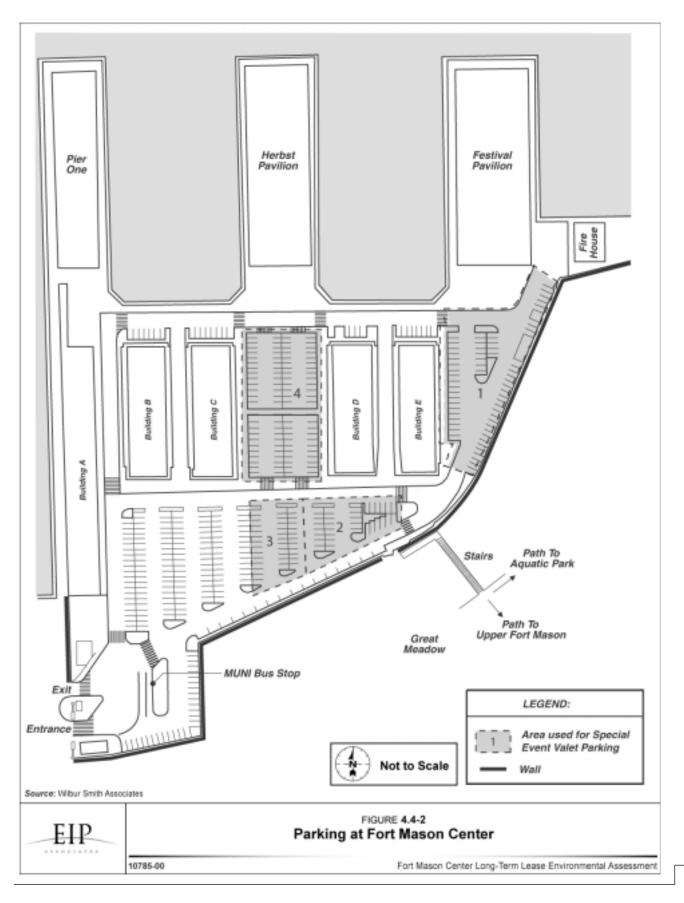
In addition to valet parking, FMF currently employs a variety of TDM techniques and measures to accommodate tenant and visitor parking demands during the full range of events and activities that occur throughout the year at FMC. This TDM program is discussed in more detail below. Depending on the size and nature of the events occurring at FMC, visitors may be asked to use valet parking, or to park their vehicles in the nearby Yacht Harbor or Gashouse Cove lot (105 spaces), the Marina Green lots (665 spaces), the Presidio, and/or the Marina Middle School (500 spaces). Shuttle buses are often employed when these off-site lots are utilized.

Table 4.4-1	Existing Intersection Operating Conditions—		
	Weekday P.M. Peak Hour / Saturday Midday Peak Hour		

	Existing		
Time Period/Intersection	LOS	Delay	
Weekday P.M. Peak Hour			
Marina/Fillmore	С	25.3	
Marina/Beach/Buchanan	В	14.8	
Beach/Laguna	С	30.2	
Bay/Laguna	D	41.3	
Saturday Midday Peak Hour			
Marina/Fillmore	В	15.8	
Marina/Beach/Buchanan	С	21.0	
Beach/Laguna	С	23.4	
Bay/Laguna	С	21.5	
Delay presented in average delay per vehicle.	•		

Source: Wilbur Smith Associates June 2003

LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT





Currently, the FMF staff schedules events throughout the year. Days in which at least 100 people are expected to attend events are categorized as "activity days." It is important to note that certain visitor oriented venues such as the restaurants and the theaters operate virtually everyday of the year and that that activity day visitor activity is activity that occurs in addition to the visitors generated by these everyday venues. Days in which at least 1000 people are expected to attend events at the FMC are categorized as "high impact." Table 4.4-2 below presents information summarized from this calendar for the years 2001–2003. For the three-year period, the number of high impact days ranged from 46 to 67, or 13 to 18 percent of the time. Activity at Fort Mason varies considerably from one year to the next, and appears to be influenced by the economy and the availability of competing venues.

On high parking impact days, there is the potential for parkers destined to the FMC to park on street in the nearby residential neighborhoods. On weekdays, this is difficult, because the areas are protected by a residential

permit parking program, which limits vehicles not displaying a residential permit parking sticker to two hours parking. On weekends, these restrictions do not apply, and parking in the residential areas is possible although not as convenient as parking in the Gashouse Cove lot or the Marina Green lot for most visitors.

Parking conditions were determined at the existing on-street and off-street parking facilities in the vicinity of FMC. The on-street study area was bound by Fillmore Street to the west, Marina Boulevard and Beach Street to the north, Laguna Street to the east, and Bay Street to the south, whereas the off-street study area included the parking lots at the Marina Green, Gashouse and Fort Mason Center. In addition, the existing parking conditions at the adjacent Marina Safeway and the Marina Middle School (where visitors to Fort Mason can park during large events) were determined. The parking conditions were evaluated for the weekday late afternoon/early evening (between 4:30 and 6:30 P.M.) and the Saturday afternoon (between 12:00 and 2:00 р.м.).¹

Table 4.4-2 A	Annual Summary of Event Days and High-Impact Days Fort Mason Center				
Year		Activity Days!	High Impact Days ²		
2001		188	67		
2002		85	46		
2003		161	58		

^{1.} Activity Days-days in which at least 100 people are expected to attend events or performances at Fort Mason Center

Source: Fort Mason Center

^{2.} High-Impact Days - Days in which at least 1000 people are expected to attend events or performances at Fort Mason Center

¹ Parking occupancy counts were conducted on Wednesday, June 4, 2003, and on Saturday, June 7, 2003. Parking supply was based on data from the Fort Mason Transportation Study – Final Report, December 1995.



Table 4.4-3 presents the overall parking occupancy for the existing weekday afternoon and Saturday midday conditions. Currently, onstreet parking spaces in the study area total about 445, the FMC lot likewise contains about 445 parking spaces, the Gashouse lot contains about 105 parking spaces, and the Marina Green lot contains about 655 parking spaces. During the weekday afternoon, the on-street parking is about 73 percent occupied, whereas the three off-street lots have a combined occupancy of about 44 percent. During Saturday afternoon, on-street parking is about 88 percent occupied, whereas the three off-street lots have a combined occupancy of about 75 percent.

TRANSIT

Transit service to Fort Mason is provided by the San Francisco Municipal Railway (MUNI). The only transit line serving Fort Mason directly is MUNI route #28, a bus route that travels between Fort Mason and the Daly City BART Station via Lombard Street, the Presidio, and 19th Avenue. Seven other MUNI bus routes run near Fort Mason, but require walking three to four blocks to Van Ness Avenue, Fillmore Street, or Chestnut Street. These routes provide linkages to most of San Francisco and to the regional transit network nodes located along Market Street and at the Transbay Terminal in downtown San Francisco. While transit access

Table 4.4-3	Existing Parking Conditions—Weekday Afternoon / Saturday Midday							
		Weekday Afternoon		Saturday Midday				
Location	Supply	# Occupancy	% Occupancy	# Occupancy	% Occupancy			
Fort Mason Center Lot	445	199	45%	276	62%			
Gashouse Lot	105	76	72%	96	91%			
Marina Greet Lot	655	252	38%	535	82%			
Study Area On-Street	445	324	73%	392	88%			
Total	1,650	851	52%	1,299	79%			

In addition to the above public parking areas, the parking lot for the Marina Safeway contains about 180 parking spaces, which was about 61 percent occupied during the weekday afternoon and 79 percent occupied during the Saturday midday. The Marina Middle School contains about 440 parking spaces, which was about 70 percent occupied during the Saturday midday.

to FMC is high, the majority of visitors tend to use their private automobiles to attend events and performances. Some visitors, such as those who take classes, and resident organization employees are more likely to take transit to FMC, although there are no known statistics to indicate how many drive versus ride transit, bicycle, or walk.



NONMOTORIZED TRANSPORTATION

Fort Mason is located on a recreational trail for pedestrians and bicyclists that extends from Fisherman's Wharf to Fort Point under the Golden Gate Bridge via Aquatic Park, the Marina Green, and Crissy Field in the Presidio. A set of stairs that links FMC with Upper Fort Mason connects to this path, and it can also be accessed in the vicinity of the Gatehouse at the FMC entrance.

TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM

The FMF has an existing, well-developed TDM program, which is designed to accommodate the traffic and parking demands of the broad range of events and activities without creating adverse parking and traffic impacts in the nearby Marina District residential areas. The focus of the program is on traffic and parking management and its intent is not on compliance with the Americans with Disability Act or enhancement of nonmotorized or transit access to FMC. The FMF has on staff an Event Coordinator who is responsible for the ongoing administration of the TDM program. The Event Coordinator works closely with the Sales and Client Services Departments to plan and implement the appropriate TDM measures for each event. During the process of scheduling and planning each event, the following factors are assessed:

- Type and nature of the event,
- Expected Attendance,

- Duration of the event,
- Relationship to other planned events at FMC and elsewhere, and
- Past experience with this event or similar events.

The parking needs for most activities can be accommodated by the existing parking facilities at FMC. Some events require the use of valet parking, and others warrant use of one or more of the remote parking facilities. The largest events can involve use of remote parking in the Presidio. When remote lots are used, the FMC often requires that the client (the event sponsor) pay for the costs of shuttle bus services. Shuttle bus operations are overseen by the FMF, and shuttle buses are restricted from operating on residential streets in accordance with the City of San Francisco requirements.

The FMF maintains a calendar of events and a parking impact report. The parking impact report indicates the expected size of the event and the TDM measures which will be implemented to accommodate the event. The FMF sends out the parking impact forecasts and special notices for large events to a variety of groups including its residents, GGNRA, SF Parks and Recreation, SF Maritime National Historic Park, NPS Police dispatch and Special Events, and the Presidio Fire Department.

The FMF utilizes its own staff to manage the actual operations during an event and regularly employs a private parking operations firm when valet parking is needed. For large events, the FMF has the option of requesting the

assistance of United States Park Police officers to direct traffic, enforce parking restrictions, and provide security.

The TDM program also includes special consideration for the parking of oversized vehicles at FMC for the staging of events. The NPS has stipulated that up to 10 oversized vehicles can be staged overnight for up to five days. Special approval is needed for additional vehicles or a longer duration. Arrangements are sometimes made to park oversized vehicles at the Presidio.

LONG-TERM TRANSPORTATION IMPROVEMENTS

Two significant transportation improvement projects that would improve access to Fort Mason are under consideration by other public agencies. The first is the potential extension of the MUNI E/F-Line Historic Trolley Service to Fort Mason. The E/F-Line currently extends from the Castro District via Market Street and The Embarcadero to Jones Street in the Fisherman's Wharf area. For many years, it has been proposed that this line be extended to Fort Mason via the unused tracks through Aquatic Park and the existing railroad tunnel that exists under the hill on which Upper Fort Mason is located. The concept of a further extension to the Presidio has also been discussed. The Presidio Trust is planning to conduct a feasibility study of this extension in cooperation with MUNI and the NPS. At the present time, however, there is no commitment or timetable to implement this project. If implemented, it would have a positive impact on transportation access to the FMC by potentially reducing the needs for automobile travel to the site.

consideration is the potential implementation of waterborne passenger ferry service to Fort Mason. The California State legislature has established the Water Transit Authority (WTA) to develop an improved network of ferry services on San Francisco Bay. The implementing legislation that established the WTA (Government Code Section 66540) directs the WTA to increase regional mobility through the development and operation of a comprehensive water transit system and its associated landside facilities and adjunct services. During its efforts to develop a plan for enhanced ferry services for the Bay Area, the WTA considered a ferry service to Fort Mason as an extension of service from Berkeley to the San Francisco Ferry Terminal. That service is part of the current plan that WTA has put forward for environmental review. The most recent draft (June 2003) of the WTA Program EIR for Expansion of Ferry Service on San Francisco Bay includes off-peak and weekend service to Fort Mason as part of the proposed project. The GGNRA is developing a Water Shuttle Access Plan consistent with the long-term transportation strategy outlined in the 1980 GGNRA General Management Plan (NPS 1980) and the former Congressionallymandated Golden Gate Travel Study (GGNRA 1977). The goals of the Water Shuttle Access Plan include (1) maintaining consistency with GGNRA and applicable regional, state and water transit plans; (2) contributing to improving the Bay Area environment and preserving and protecting the park's natural and cultural resources associated with accessing the park; (3) enhancing the quality of the visitor experience; (4) increasing opportunities for diverse visitor populations to access park sites;

The second transportation improvement under



and (5) providing cost-effective, reliable and safe water shuttle service. FMC was identified as a terminal in the Final Ferry Shuttle plan (off-peak and weekend service from the Ferry Building) and will be identified as a hub in the GGNRA Water Shuttle Plan.

The development of ferry service to FMC is in the planning stage. Neither the WTA nor the GGNRA has the funding to implement such service, and it is uncertain if and when the service would be implemented. Although the outcome of ferry service at Fort Mason as part of the Water Transit system is still speculative, it is possible that other vessels could use the piers for stopovers. In addition to water uses such as ferry or water taxi, temporary or permanent moorings of vessels with complementary programmatic uses are possible. The environmental effects of such water transit services will be analyzed in subsequent NEPA environmental documents.

■ Environmental Consequences

NO ACTION ALTERNATIVE

FMC has an effective TDM program that accommodates the travel and parking demands of the multiple activities and events held at the Center, without major effects on the surrounding uses. The No Action Alternative, however, could jeopardize the ability of the Center to maintain the current quality of transportation services and to address current transportation needs of the FMF due to funding limitations. In addition, FMF would not have new opportunities to generate revenues to fund new transportation programs.

Under the No Action Alternative (continuation of the Cooperative Agreement), FMC would continue to operate as it does currently with its annual calendar of events, classes, and performances. The number of programs and visitor levels would be expected to be comparable to current levels, with some increase once the Pier Two seismic retrofit is completed. As a result, the traffic generated by activities at FMC and the parking demand would not be expected to change to an appreciable degree from current levels. The No Action Alternative would, therefore, have negligible effects on area access, circulation, and parking.

By the same token, the No Action Alternative would not create any new opportunities for either the NPS or FMF to initiate transportationrelated improvements or programs, beyond the existing TDM program. The current somewhat confusing entrance from the signalized intersection of Buchanan Street and Marina Boulevard and the large undefined MUNI turnaround space would remain unimproved. Under the existing Cooperative Agreement, FMF would not be able to implement parking pricing, which is one of the most effective tools for parking management. Under the current agreement, the NPS would continue to be the lead agency in terms of implementing paid parking.

The potential inability of the FMF to generate the finances needed to fund transportation programs under the current agreement could delay or prevent needed transportation improvements such as the Wayfinding and Signage Program, parking lot improvements, and parking management—all of which could improve the transportation.

PREFERRED ALTERNATIVE (LONG-TERM LEASE)

The Preferred Alternative would have the beneficial effect of enabling the FMF to initiate fundraising and development activities that, in turn, would help finance transportation-related improvements. Although development of Pier One would result in increased parking and traffic demand at the FMC, the long-term lease would also enable FMF to institute paid parking that would help offset some of the effects of Pier One development.

Vehicular Circulation and Access. The rehabilitation and occupancy of Pier One is probably the only component of the project that is likely to result in additional vehicular activity at FMC. The other changes to FMC that would be more likely under the Preferred Alternative include seismic upgrades to existing buildings and substructures that are at risk, parking control, utility improvements, and maintenance and upkeep activities. These activities would not increase the usable square footage at FMC or increase the population of employees and visitors. As a result, these activities would have a minimal effect on transportation-related conditions. To determine the effect of the project on the local transportation network, the travel demands associated with Pier One were estimated, and the existing and existing plus project conditions were assessed for the nearby intersections and on- and off-street parking facilities.

It is anticipated that Pier One would contain similar uses as the other buildings of the FMC, such as meeting/exhibition space, restaurants and gift shops, and museum/cultural space. Pier One would contain about 44,000 square feet of usable space. Since FMC currently contains about 302,000 square feet of usable space (this includes Building E, which is used by the Maritime Museum and is not operated by the FMC), the opening of Pier One would add about 14.5 percent to the total available square footage. Approximately half of the space in Pier One would be visitor oriented and the other half would be leased tenant space. This space allocation is consistent with the current mix of uses at FMC and adheres to the 1980 General Management Plan. Thus, with the completion of the Pier One renovations, which is expected to require 7 to 10 years, the traffic and parking demands of the total FMC complex could be expected to increase by up to 14.5 percent of the current demand levels. This is a conservative estimate of growth, because it is the visitororiented uses that generate more traffic and parking demand than the residents at FMC and yet all of the Pier One floor area has been assumed to contribute trips and parking demand as if the space were entirely used for visitor-oriented venues, even though the visitororiented uses would be about half of the total space.

To estimate the increase in vehicular activity on a typical weekday and weekend day with Pier One, the existing vehicular counts at the main driveway into the Gashouse Lot and FMC were used. During the weekday P.M. peak hour, there are currently 155 vehicles entering the lot and 158 vehicles exiting the lot; during the Saturday



midday peak hour, there are currently 186 vehicles entering the lot and 143 vehicles exiting the lot. Assuming that new visitors to FMC with Pier One renovated would have the same travel characteristics as existing visitors, the entering and exiting traffic volumes were increased by 14.5 percent to account for the increase in square footage associated with Pier One. The rehabilitation of Pier One would result in an additional 46 vehicle trips during the weekday P.M. peak hour (23 entering and 23 exiting) and 48 vehicle trips during the Saturday midday peak hour (27 entering and 21 exiting).

With the additional travel demand associated with the project (an additional 46 vehicles during the weekday P.M. peak hour and 48 vehicles during the Saturday midday peak hour), there would be a minor increase in the average delay per vehicle at the study intersections. However, study intersections would continue to operate at acceptable conditions (LOS D or better) during both analysis periods (see Table 4.4-4).

As such, the project would result in minor impacts to the local intersections and would not have a perceivable effect on operating conditions. The traffic entering and exiting the FMC site may not represent all the traffic generation of the FMC, but it is certainly representative of the activity on an average or typical day. Although some of the visitors that enter and exit the Gashouse Cove parking lot are not associated with FMC, other visitors to FMC park on street or within other parking facilities in the surrounding neighborhood. The approach used in this analysis provides a general understanding of the travel demand and parking demand associated with FMC and the rehabilitation of Pier One.

This analysis focuses on the impacts of the development of Pier One on a typical day. It is important to consider the impact of the increased floor area on the number and size of events at FMC. The added visitor-oriented space would allow FMC to schedule more activities

Table 4.4-4 Existing and Exist Weekday	ing Plus Projec P.M. Peak Hou			_	
		Existing		Existing plus Project	
Time Period/Intersection	L	OS	Delay	LOS	Delay

Time Period/Intersection	LOS	Delay	LOS	Delay
Weekday P.M. Peak Hour				
Marina/Fillmore	С	25.3	С	26.0
Marina/Beach/Buchanan	В	14.8	В	15.1
Beach/Laguna	С	30.2	С	31.1
Bay/Laguna	D	41.3	D	42.1
Saturday Midday Peak Hour				
Marina/Fillmore	В	15.8	В	16.0
Marina/Beach/Buchanan	С	21.0	С	21.9
Beach/Laguna	С	23.4	С	23.8
Bay/Laguna	С	21.5	С	21.6

Delay presented in average delay per vehicle

Source: Wilbur Smith Associates, June 2003.



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and events and to accommodate more visitors on a given day. This expansion of activities could potentially have two impacts:

- An increase in the number of days per year termed "high impact" days when the parking supply at FMC would not be adequate to serve the demand, and
- An increase in the number of visitors attending events on a given day.

It is difficult to quantify the implications on areawide traffic of these two types of events. On days when the parking capacity at FMC is not exceeded, the impacts on traffic would be similar to those presented in the above analysis at the study intersections. When a "high impact" day occurs many motorists will be directed to park in the designated remote locations. As a result, traffic traveling to and from these larger events tends to be dispersed over a larger area than on days when all the parking is contained at FMC. The traffic volumes in and out of FMC using the Buchanan Avenue and Marina Boulevard intersection represent a small percentage of the total traffic using this intersection. The expected growth in traffic due to the development of Pier One would therefore have a negligible effect on traffic conditions at this location. The impacts would even be less at the other study intersections, which are more remote from the site.

One other impact of the increased number of visitors is the greater confusion at the entry-exit of the FMC parking area. Because signage is poor and the bus turnaround immediately past

the FMC entry gate is not well defined, additional motorists/parkers in this area would further aggravate the poor orientation for park visitors.

Parking. Two factors would most affect future parking demand at FMC-development of Pier One and paid parking.

Pier One. Development of Pier One would add 44,000 net usable square feet of floor area to the FMC. This expansion represents an increase of 14.5 percent in the total leasable floor area at the FMC (this includes Building E, which is used by the Maritime Museum) and, a concomitant increase in parking demand. During the weekday afternoon, observations conducted as part of this analysis indicated that there were currently 199 vehicles parked at FMC; during the Saturday midday, there are currently 276 vehicles parked at FMC. The Preferred Alternative would result in an additional parking demand for 29 spaces during the weekday afternoon and 40 spaces during the Saturday midday.

This increase would result in a greater number of days of the year being classified as high parking impact days. A 14.5 percent increase in demand would suggest that the previous observed high of 67 high impact days per year experienced in the year 2001 could increase to as many as 77 days per year. On these days FMC must implement TDM measures to increase the parking supply through valet parking on the FMC site and/or the use of remote lots. On these days, there is also the potential for some intrusion of parkers into the nearby residential areas, especially on weekends, when



neighborhood residential parking permit restrictions are not in force. The majority of the high parking impact days occur on weekend days. The observations of parking activity for both weekday and weekend conditions conducted as part of this analysis indicated that the TDM measures used by FMF are successful in limiting the amount of parking that spills over into the neighborhoods. Development of Pier One would increase the demand for on-street parking in the Marina District, but it would not result in an increase so great that the current TDM program could not address it. Nevertheless, the current TDM program should be improved to assure that it would mitigate the moderate parking impact from development of Pier One.

Parking Pricing. Under the Preferred Alternative, FMF would have the ability to impose parking fees in the FMC lot. Parking fees represent a powerful parking management tool and could encourage employees and visitors to seek out and use alternative transportation modes such as public transit and carpools, rather than drive to and park at FMC. Parking fees would also discourage use of the FMC parking by commuters to other areas of San Francisco and by other parkers not destined for the FMC. Both the FMF and the City Yacht Harbor are considering imposing parking pricing as a means of parking management and as a source of revenue. Because of the proximity of the two parking lots, it would not be practical or advisable to impose paid parking in one lot without paid parking in the other lot also. Otherwise, parkers would seek out the free parking lot first and avoid the pay lot. The

following assessment of the impacts of parking pricing assumes that both lots would become pay lots at the same time.

There are a number of different strategies to implement a paid parking scheme. Based on Wilbur Smith Associates' experience with such programs, a hypothetical, but feasible, mechanism is described here for analytical purposes. Paid parking could be implemented at the FMC lot by installing automated entry and exit gates with a cashier booth in the gatehouse area to control the parking. Parking for employees could be controlled through the use of card keys to allow automatic entry and exit for a monthly fee. Others would be charged for parking on an hourly basis or on a per event fee basis. Payment would be collected on exiting the parking area. When major events are scheduled, fees could be collected on entry to avoid long queues of cars forming at the exit gates.

The imposition of parking fees has the effect of reducing parking demand. In particular, employee parking demands are likely to decline because some employees would decide to carpool, take transit, or walk/bike to FMC. General experience from other pricing studies is that the imposition of employee parking fees reduce employee parking demand by 10 to 15 percent, depending on the amount of the fee and whether the employer or the employee actually is the one paying the fee. A tenant survey conducted in 1999 by Walker Parking Consultants for FMC indicated that weekday employee parking needs are approximately 200 spaces, and weekend day employee parking



needs were reported as 90 spaces on Saturday and 40 on Sunday (walker parking consultants, 1999).

The potential adverse affect of parking fees would be that some employees would attempt to park in the nearby residential areas in order to avoid the fees. During weekdays, when the residential permit parking restrictions are in force, this type of parking abuse would not be prevalent. On weekend days, however, some parking intrusion into the residential areas would be more likely. Nonetheless, employees—who would be the most likely group to want to seek out free parking—are not a large portion of the population at FMC on weekend days.

A group that would be affected by parking fees would be short-term visitors to the area who wish to park at FMC. These are persons who are using the FMC parking lot in order to gain short-term access to the waterfront and the nearby park areas of Upper Fort Mason. This group could also include persons stopping at FMC just to see what is available or to conduct short-term business. The fact that they would have to pay a fee for such a short visit may discourage some short-term visitors from coming to FMC. A parking fee grace period that would allow short-term visitors to park for free for a limited period would help accommodate the needs of the short-term visitor.

The imposition of parking fees would have a lesser effect on long-term visitors to FMC. Fort Mason is one of only a few remaining visitor-oriented venues in San Francisco that does not charge a parking fee. In general, parking fees in the range of a \$1.00 per hour and \$4.00 to

\$10.00 for event parking are very common and would not alter the behavior of most parkers. The most likely group of parkers to be affected would be persons who park at FMC for purposes other than visiting facilities or events at FMC. This group includes weekday commuters who park at FMC to board transit to reach their workplace in downtown San Francisco, and persons who park in the area to visit other nearby uses. This type of parking would be discouraged by parking fees.

While the parking area at Upper Fort Mason is quite a distance from the FMC and requires walking over hilly terrain, charging fees for parking at FMC may result in some parkers making the decision to park at Upper Fort Mason rather than FMC. This shift in parking demand could tax the limited parking at Upper Fort Mason and require the NPS to implement measures to limit the use of the parking to employees and visitors of Upper Fort Mason. FMF's existing TDM program has proven that proper event planning can accommodate the parking demands generated by the range of events and activities at FMC. Paid parking is one more TDM tool that would assist in the management and operation of the parking resources available to the FMC.

Transit. The development of Pier One and the imposition of parking fees at Fort Mason would have the positive effect of increasing transit usage. No adverse impacts on existing transit operations have been identified. The increased transit demand may help justify improvements in the available transit services, such as E/F-Line extension, which are limited at this time.



Nonmotorized Transportation. The development of Pier One and the imposition of parking fees at Fort Mason would have a minor impact on the use of the existing pedestrian and bicycle facilities in the area. Paid parking would encourage some employees and visitors to use alternative modes. The eventual increase in vehicular activity at the Marina/Buchanan intersection would somewhat increase conflicts between vehicles and pedestrians/bicyclists using the bayfront recreational path in this area. The San Francisco County Transportation Authority has submitted an application for a grant to conduct a Northern Waterfront Pedestrian/Bicycle Study. The FMF has agreed to be a participant in the study.

CUMULATIVE EFFECTS

The major projects that could have a cumulative effect on transportation in this area of San Francisco are the planned reconstruction of the Doyle Drive and the Presidio Trust Implementation Plan (PTIP) for the Presidio. The Doyle Drive project involves the reconstruction of the Doyle Drive viaduct to address seismic and structural deficiencies. It would also enhance the aesthetics of the facility and its interaction with the Presidio. The project is not intended to provide additional traffic capacity and for that reason would not result in increased traffic in the vicinity of Fort Mason. The PTIP does call for an increase in the total land uses and the amount of employee and visitor activity at the Presidio. It would generate increased traffic on the roadways in the vicinity of Fort Mason. However, the traffic analysis for the PTIP EIS indicates that the two study intersections that are closest to Fort Mason (i.e.,

the intersection of Doyle Drive with Marina Boulevard and Lyon Street and the intersection of Marina Boulevard with Lyon and Mason Streets) would not experience a change in the traffic levels of service with the PTIP, compared to existing year 2000 conditions (Wilbur Smith Associates, 2001). Thus, suggesting that neither of these projects would have substantial effect on traffic in the vicinity of Fort Mason.

MITIGATION MEASURES

The following mitigation measures would help reduce the confusion at the entry-exit to FMC and offset the increased demand for parking with changes in activities at FMC. The first measure addressing parking lot improvements is applicable to both the No Action Alternative and the Preferred Alternative. In contrast, the next two mitigation measures would be appropriate only for the Preferred Alternative

Mitigation Measure 1

Parking Lot Improvements. The effectiveness of the existing and future revisions to the TDM program is related to the ability of FMC visitors to easily access the existing FMC parking lots. Towards this end, the existing entrance area and parking lot of FMC should be improved through better wayfinding/signage, roadway and parking lot marking and channelization, and lighting. These improvements should be designed to efficiently serve transit vehicles, pedestrians, bicyclists, and persons with disabilities.

Mitigation Measure 2

Enhanced TDM Program. FMF operates an effective ongoing TDM program. With the eventual growth of activity due to the development of Pier One and the conversion of the FMC parking to paid parking, there is a need to formalize and enhance the TDM program. The FMF has prepared a formal TDM plan, which is provided as Appendix D to this document. Key objectives and features of this plan include:

- Continuing to promote carpooling,
- Continuing to provide event-specific parking information,
- Implementation of paid parking in consultation with other public agencies,
- Continuing to encourage use of transit by staff/employees, as well as visitors, and
- Providing incentives to staff/ employees to ride bicycles.

Once accepted by the FMF and the NPS, the FMF would have responsibility for implementing the recommendations of the TDM plan. Among these recommendations is the provision of a grace period or an initial period of free parking to accommodate short-term visitors, if parking fees are instituted, in order to reduce the impact of the parking fee on the visitor experience.

Mitigation Measure 3

Coordination with Other Agencies for Transportation Improvements. Since both the City Yacht Harbor and the Presidio are in the process of implementing paid parking and other improvements and the GGNRA is studying implementation of paid parking at selected park sites, the FMF should maintain actively ongoing communication and coordination with these agencies. The implementation of parking pricing at FMC needs to be fully coordinated with these agencies. These agencies should also continue to coordinate their efforts to participate in the upcoming study of the extension of the E/F-line historic trolley and further efforts to develop a ferry passenger service.

4.5 Consistency with Local Land Use Plans

■ Introduction

The function and intent of the FMC is defined by the NPS 1980 General Management Plan/Environmental Analysis. The environmental review portion of that document identified a number of local planning and regulatory agencies that were consulted in the plan preparation and environmental documentation in accordance with the National Environmental Policy Act. Two regional planning agencies are specifically mentioned: the California Coastal Zone Commission and the San Francisco Bay



Conservation and Development Commission (BCDC). Both of these agencies have produced policies and guidelines for the proper use and development along the shoreline. The environmental document notes that "generally, policies of both commissions support recreational use as a priority for shoreline areas and do not appear to be in conflict with National Park Service policies" (NPS 1980). In response to a scoping letter distributed for this EA, the BCDC has requested an analysis of the Fort Mason Center Long-Term Lease's consistency with the San Francisco Bay Plan, the McAteer-Petris Act, and Regulation Section 10704.

The City and County of San Francisco also has local land use plans and policies that are influenced by activities at the FMC. The project alternatives only address lands owned by the NPS and do not directly affect lands under the jurisdiction of the City and County of San Francisco. Accordingly, this section of the EA does not consider the project's consequence on the city's General Plan, although background from the plan is provided for informational purposes. This notwithstanding, Section 4.6, Urban Quality, does address the project's effect on the surrounding neighborhood.

Setting

COASTAL ZONE MANAGEMENT ACT

The federal Coastal Zone Management Act of 1972 (CZMA) encourages state conservation of natural resources such as beaches, tidal marshes, and coral reefs, through provision of incentives for states to implement

comprehensive land use plans for the coastal zone. Participation in the program, which entails development of a coastal zone management program, is voluntary and determined at the state level. The CZMA requires federal agencies or licensees to carry out their activities in such a way that they conform to the maximum extent practicable with a state's coastal zone management program. Within the State of California, the California Coastal Act, which serves as California's coastal zone management program, grants the California Coastal Commission jurisdiction over California's coastal zone. However, the San Francisco Bay Conservation and Development Commission (BCDC) issues federal consistency determinations under the Coastal Zone Management Act for areas within its jurisdiction, which includes a majority of the San Francisco Bay shoreline.

It should be noted that, according to the abovementioned scoping letter sent by BCDC, the federal CZMA "exempts from the coastal zone federal enclaves and federal lands subject to the exclusive jurisdiction of the federal government. The [BCDC's] federally approved management program for the San Francisco Bay segment of the California coastal zone acknowledges that this exemption applies to all federally-owned and federally leased lands." Fort Mason is owned by the NPS and is therefore exempt from BCDC jurisdiction. However, FMF and NPS acknowledge the San Francisco Bay Plan and McAteer-Petris Act, as described below, and the management objectives established for FMC are consistent with BCDC's plans and regulations.

MCATEER-PETRIS ACT/SAN FRANCISCO BAY PLAN

The McAteer-Petris Act of 1965 established the BCDC as an agency to prepare an enforceable plan to guide the future protection and use of San Francisco Bay and its shoreline, currently known as the San Francisco Bay Plan. This Act also designated the BCDC as the agency responsible for maintaining and carrying out the provisions of the Bay Plan in order to protect the Bay' natural resources and to develop the Bay's shoreline while minimizing Bay fill. In August 1969, the McAteer-Petris Act was amended to make BCDC a permanent agency and to incorporate the policies of the Bay Plan into state law. To date, the McAteer-Petris Act has served as the key legal provision under California state law to preserve San Francisco Bay from indiscriminate, or haphazard, filling.

The San Francisco Bay Plan was completed and adopted by BCDC in 1968 and submitted to the California Legislature and Governor in January 1969. The Bay Plan describes the values associated with the Bay, establishes policies to guide future uses of the Bay and shoreline, and provides maps that apply these policies to the present Bay and its shoreline (BCDC 2002). Since its adoption, the Bay Plan has been amended periodically and BCDC continues to systematically review the Bay Plan to keep it current. The date of the most recent amendment adopted by the Commission is printed at the end of any amended policy section. Although the water quality element of the Bay Plan was recently updated, the National Oceanic and Atmospheric Administration (NOAA) has not yet approved this update. NOAA has authority

in approving the water quality portion of the Bay Plan because NOAA houses the National Marine Fisheries Service, which has jurisdiction over most endangered and threatened marine species, including fish and marine mammals (BCDC 2003).

The ongoing operation, maintenance, and development of FMC have an important influence on the activities that occur along the San Francisco Bay waterfront and thus are directly relevant to implementation of the San Francisco Bay Plan. The 1980 General Management Plan that provides a blueprint for FMC seeks to promote access to the bayshore, in addition to adaptively reusing the historic structures for a variety of cultural, recreational, and educational programs. The evolution of FMC in adhering to these goals has also helped fulfill the mission of BCDC.

PUBLIC ACCESS POLICIES OF THE SAN FRANCISCO BAY PLAN AND SECTION 66602 OF THE MCATEER-PETRIS ACT

Section 66602 of the McAteer-Petris Act states, in part, that "existing public access to the shoreline and waters of the San Francisco Bay is inadequate and that maximum public feasible public access, consistent with the proposed project, should be provided..." The San Francisco Bay Plan policies on public access further state that "maximum feasible public access should be provided in and through every new development in the Bay or on the shoreline...this access should be permanently guaranteed...should be consistent with the physical environment, including protection of natural resources...provide for the public's



safety and convenience...an built to encourage diverse Bay related activities and movement to and along the shoreline..." These policies are relevant to the FMC, because the FMC and the entire GGNRA create opportunities for the public to appreciate, enjoy, and access the waterfront. Future development of FMC can further enhance or detract from public access to the shoreline.

SECTION 66605 OF THE MCATEER-PETRIS ACT

Section 66605 of the McAteer-Petris Act, "Findings and Declarations as to Benefits, Purposes and Manner of Filling," requires that fill in the Bay should only be authorized under certain circumstances. This regulation states that fill should only be authorized when:

- 1. The public benefits from the fill clearly exceed public detriment from loss of the water areas,
- 2. The fill is limited to water-oriented uses or minor fill to improve shoreline appearance or public access,
- 3. There is no alternative upland location,
- 4. The fill is the minimum amount necessary,
- 5. The fill minimizes harmful effects to the bay, such as the reduction or impairment of the volume, surface area, or circulation of water, water quality, fertility of marshes or fish and wildlife resources, and
- 6. The fill will, to the maximum extent feasible, establish a permanent shoreline.

The proposed alternatives (continuation of the existing Cooperative Agreement and a new long-term lease) in and of themselves would have little relevance to potential fill of the San Francisco Bay and, thus, Section 66605 of the McAteer-Petris Act. However, there are capital improvements being considered by NPS, FMF, and other public agencies at FMC that could be implemented within the timeframe of the project alternatives and result in fill of San Francisco Bay. These projects include the pier substructure retrofit, the pier shed renovation, and the implementation of water transit service or vessel moorings.

REGULATION SECTION 10704

According to the BCDC, Regulation Section 10704 may be relevant to the project alternatives. If current uses of the piers are not necessarily water-oriented, Regulation 10704 states, in part, that "[t]he Commission may approve fill as necessary to the welfare of the public in the entire Bay Area to protect historic structures..." The regulation identifies eight specific tests that must be satisfied in order for BCDC to approve the fill. The regulation would appear to be relevant since the intended uses for Pier One would not all be water-oriented, as defined in Section 66605(a) of the McAteer-Petris Act; however, the piers are part of a National Historic Landmark District and the vacation of Pier One and its current use for storage and construction staging was necessitated because of a seismic safety report indicating that continued use of the pier as a public venue would be unsafe because of the poor seismic integrity of the facilities. Prior to

its recent vacation, Pier One was used for many years by NPS as a maintenance shed and by FMF for occupancy by several of its tenants and continues in use for construction staging, storage and special use.

CITY AND COUNTY OF SAN FRANCISCO GENERAL PLAN

The FMC is under exclusive federal jurisdiction; therefore, it is not directly subject to state and local land use plans, policies, or regulations. Lacking jurisdiction, the City has not developed site-specific plans for the FMC property. The NPS seeks to minimize possible conflicts between NPS activities and City policies, and consults with the City to achieve consistency wherever possible. The San Francisco General Plan contains general land use policies and objectives for San Francisco, including housing, transportation, commercial, and recreation and open space policies. Objective 3 of the Recreation and Open Space Element of the General Plan encourages provision of continuous public open space along the shoreline. Discussion of Objective 3 states, "Significant progress has been made in opening the shoreline to the public. With the advent of the Golden Gate National Recreation Area the shoreline of the Presidio and Fort Mason has been made available to the public." Although not subject to the provisions of the General Plan, FMC land uses are consistent with the goals and policies of that document.



Public access to the waterfront at the Fort Mason Center

TRIBAL LAND USE PLANS OR POLICIES

As the FMC is not within jurisdiction of any Native American tribes, no tribal land use plans or policies apply to the FMC.

■ Environmental Consequences

NO ACTION ALTERNATIVE

The No Action Alternative could reduce public access to the waterfront at Fort Mason Center, thereby reducing conformance with the San Francisco Bay Plan and Section 66602 of the McAteer-Petris Act. This effect would be negligible when taking into account extensive



public access opportunities in the area. The No Action Alternative would have no effect on consistency with any other agency or tribal land use plans or policies.

Under the Cooperative Agreement, the NPS would retain responsibility for upkeep of the structures; however, given the limited budget for activities at Fort Mason, it is not anticipated that NPS would be able to adequately maintain or restore the historic buildings, including Piers One and Three. As a result, the buildings would likely continue to suffer from deferred maintenance. Without renovations of these structures, the FMF and NPS may be forced to close some structures or portions of structures to public access due to safety concerns. Closing these structures, particularly Pier Three, would reduce public access to the waterfront, thereby diminishing the site's conformance with the San Francisco Bay Plan and Section 66602 of the McAteer-Petris Act. For further information on public access at the FMC under the Preferred Alternative and the No Action Alternative, refer to Section 4.2, Visitor Experience.

PREFERRED ALTERNATIVE

The Preferred Alternative would not conflict with land use plans or policies. As activities conducted under the long-term lease would be consistent with the NPS General Management Plan, the San Francisco Bay Plan, the McAteer-Petris Act, and Regulation Section 10704, the project is not anticipated to contribute to policy inconsistencies, cumulatively or individually. The Preferred Alternative would not conflict with any tribal land use plans or policies, as none apply to the site.

SECTION 66602—PUBLIC ACCESS

Section 66602 seeks to maximize public access to the shoreline and waters of the San Francisco Bay. FMC was created specifically with the purpose of enhancing public access to the waterfront, from its historic military use. The 1980 General Management Plan and development of FMC over the past 25 years has fulfilled this original mission. The Preferred Alternative would better enable the restoration of Pier One and the provision of another public venue on the waterfront; other existing opportunities to access the waterfront would remain unchanged under the Preferred Alternative. Specific public access policies identified in Section 66602 and FMC's fulfillment of those policies are enumerated below:

Current Public Access. As discussed in Section 4.2, Visitor Experience, the FMC currently provides excellent waterfront access for San Francisco visitors and residents. The residents housed at the FMC encourage a diverse array of Bay-related activities, including the Yacht Racing Association of San Francisco Bay, the Oceanic Society, which provides environmental education and research through naturalist-led trips (such as whale watching), Sailing Education Adventures, a nonprofit communitybased sailing program with a special concern for the health of the Bay and ocean, and the Marine Exchange, who represents the Bay Area maritime community. Past activities held at FMC include a wide range of cultural, musical, and artistic events that are dependent on



locations such as the FMC: an ideal venue that is affordable, centrally located, and large enough to house attendees. During the past decade, events at FMC have included

- Poetry by Allen Ginsberg, Robert Hass, Ken Kesey, & Isabel Allende
- Baseball Memorabilia Show
- Balinese Shadow Puppets
- Swami Satchadananda
- Magic Johnson, Elizabeth Taylor & Tina Turner at Macy's Passport '97
- Senator Eugene McCarthy reading his poetry at the Bayfront Theater
- "The Buffalo Soldiers" at the San Francisco African American Historical and Cultural Society
- Funk Music Festival
- Russian-American Book Exchange
- Orchid Festival
- Lines Contemporary Ballet
- Exhibitions and trade shows from Israel, Japan, Vietnam, Tibet, and Sweden

The array of activities at FMC increases public access to the waterfront by attracting a large number of diverse visitors.

Preservation of Public Access. The existing Cooperative Agreement does not limit public access to the waterfront. The Preferred Alternative would not change this provision; rather it would enhance public access by making more feasible the restoration and renovations of Piers One and Three and by facilitating the implementation of FMF's Wayfinding and Signage Program. However,

it should be noted that, due to security concerns, the pier aprons would be closed at night. Thus, the Preferred Alternative would restrict some public access that is currently available; however, the restrictions would be during the nighttime and for security and protection of the Historic Landmark District.

SECTION 66605—FILL OF THE BAY

The seismic retrofit of Piers One and Three substructures, excluding the pier deck apron surfaces and sheds would remain the responsibility of the NPS and completion of this work would be subject to federally appropriated funding. The preservation of the pier deck apron surfaces and sheds would become the responsibility of FMF under the Preferred Alternative. Although these projects would require a minimum of fill (namely, placement of new pile structures or the strengthening of existing ones), it is the position of the California Attorney General's office that any modifications to pier structures beyond routine maintenance that would increase the utility or life expectancy of the pier structure would be treated as 'further filling' of the Bay within the meaning of Section 66605 of the McAteer-Petris Act. This regulation applies even though the piers were constructed prior to 1965, the date that BCDC obtained jurisdiction over activities that occur in San Francisco Bay.

Seismic retrofit of the substructures of Piers One and Three would be undertaken to preserve public access to San Francisco Bay via the pier structures and to preserve a historic resource. In accordance with Section 404 of the federal



Clean Water Act and Section 66605 of the McAteer-Petris Act, FMF and NPS would develop site-specific plans at the time pier restoration becomes feasible and, as part of that effort, would identify the amount of fill required for the project. The intent of the pier restoration would be to ensure public safety and to restore use of the pier sheds in a manner consistent with the NPS 1980 General Management Plan. The protection of public safety and the enhancement of the waterfront for cultural, recreational, and educational purposes would be weighed against the need to fill the bay. The loss of bay is expected to be minimal if the future projects are conducted similarly to the restoration of Pier Two. Regarding the other criterion for consideration, there is no alternative upland location to implement the project. Given the public recreational intent of the Preferred Alternative and the need to comply with federal laws regarding the minimal fill of waters of the U.S., the Preferred Alternative would conform to Section 66605 of the McAteer-Petris Act.

REGULATION SECTION 10704

According to the BCDC, Regulation Section 10704 requires that, before a project can be approved under this section, it must meet a number of other qualifications, namely:

1. The fill would be necessary to repair, maintain, or rehabilitate a structure that has been listed on the National Register of Historic Places or as a California Registered Landmark. The FMC is part of the San Francisco Port of Embarkation National Historic Landmark District.

2. The repair, maintenance, or rehabilitation project would be limited to the site of the historic structure and would not result in significant increase in Bay coverage. Seismic retrofit of Piers One and Three would replace existing fill. Any potential new fill would be used to ensure seismic stability of the structures.

Activities that could potentially involve fill under the Preferred Alternative would be limited to seismic retrofit of Piers One and Three, which would be undertaken to improve public safety and preserve public access to the waterfront.

- 3. The fill is necessary because it is physically impractical to repair, maintain, or rehabilitate the structure without filling.
 - This is true—it is physically impractical to seismically retrofit the piers without filling.
- 4. The amount and type of fill is the minimum necessary and the least detrimental to accomplish the repair, maintenance, or rehabilitation of the structure.
 - Increased Bay coverage would be minimal, but there are no specific drawings or proposals at this stage.
- The repair, maintenance, or rehabilitation of the structure would not alter the structure's historical designation.
 - These activities would also be undertaken to preserve the historic



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structures and would undergo proper review (the 5x process as described in Section 4.3, Cultural Resources) and oversight to ensure consistency with historic preservation policies and to ensure that the structures' historical designation is not adversely affected.

- 6. The repair, maintenance, or rehabilitation, including all fill associated with the project, would not adversely affect the present or future uses of the area for water-oriented priority land uses.
 - Seismic retrofit of Piers One and Three would not adversely affect the present or future uses of the area for water-oriented priority land use; rather, the projects would increase for both present and future wateroriented land uses.
- 7. Maximum feasible public access would be provided as part of the repair, maintenance, or rehabilitation project.
 - The project would maintain public access and prevent pier closures from deferred maintenance. There would, however, be some restrictions during the nighttime when the pier aprons are proposed to be closed for security reasons.
- 8. The repair, maintenance, or rehabilitation project, including all fill associated with the project, would comply with the provisions of Regulation Sections 66661 et seq. and the San Francisco Bay Plan, except

those policies limiting fill to wateroriented uses.

The project would comply with the provisions of Regulation Sections 66661 *et seq*.

As described above, the Preferred Alternative fulfills each of these criteria. These projects would likely involve replacement of old piles and may include installation of new piles to improve seismic stability. The FMF and NPS would develop their plans in recognition of this goal, which would also be the goal of Section 404 of the federal Clean Water Act, with which the projects must also conform. This analysis indicates that the Preferred Alternative would be consistent with Regulation Section 10704.

CITY AND COUNTY OF SAN FRANCISCO GENERAL PLAN

The Preferred Alternative would preserve and improve waterfront public access at the FMC, which is consistent with Objective 3 or the General Plan's Recreation and Open Space Element. Although the site is not under the City's jurisdiction, FMF and NPS would continue to implement programs in a manner that is generally supportive of the General Plan objectives.

Mitigation Measures

Because activities conducted under the project alternatives would be consistent with the General Management Plan, the San Francisco Bay Plan, the McAteer-Petris Act, and Regulation Section 10704, no mitigation is required to reduce policy inconsistencies.



Cumulative Effects

No current or anticipated projects would impact consistency with local land use plans at the FMC. The Preferred Alternative would not contribute to a cumulative impact.

4.6 Urban Quality

Introduction

This section of the EA addresses potential offsite impacts resulting from the proposed Fort Mason Center Long-Term Lease (FMCLTL) that could affect the character of surrounding land uses, as well as the quality of life for those living in the neighboring Marina District community. Evaluations of a project's influence on urban quality depend on the location of the park. For national parks located in wilderness areas, gateway communities often develop around the park and exist primarily to provide services for visitors (e.g., restaurants, hotels, and gas stations). In these cases, the park exerts a constant influence on its surrounding community. However, the FMC is located in an urban area and is surrounded by a number of differing land uses that are not directly linked to the FMC. It is important to evaluate how changes at the FMC will affect the surrounding community to ensure that FMC activities do not interfere with or disturb the surrounding community.

The setting discussion provides an overview of the site's surrounding land uses, which include the Marina neighborhood, the Pacific Ocean, and Upper Fort Mason, which houses NPS headquarters for the GGNRA. Future changes to the FMC that may result from the long-term lease are then evaluated for their effects on the surrounding land uses. The primary potential change to the FMC is the renovation and reuse of Pier One and the potential environmental impacts resulting from the related increases in traffic and noise. Potential implementation of paid parking at the FMC is also discussed, although for details on traffic and parking, please refer to Section 4.4, Transportation, of this EA. Over past 25 years, the FMF has created a cultural, educational, and recreational hub that reflects the diverse cultures and interests of the Bay Area community while seeking to minimize effects on the surrounding neighborhood.

Setting

SURROUNDING LAND USES

The Marina District

The Marina neighborhood, located immediately adjacent to Fort Mason Center, is a primarily residential area interspersed with neighborhood commercial strips. The Marina District is situated east of the Presidio, east of Main Post, Crissy Field, and Letterman Planning Districts. Located immediately west of the Fort Mason Center, the Marina District is a combination of single-family homes, two-family homes, and three-family homes. Residential mixed-use districts exist a few blocks farther south. A vibrant shopping area, the Marina District also includes neighborhood commercial land uses in the vicinity of the Fort Mason Center, generally along Chestnut Street, Lombard Street, and Union Street (EIP Associates 2002).



Marina district neighborhood near Fort Mason Center (along Marina Boulevard)

The San Francisco Marina Yacht Harbor

The San Francisco Marina (Marina) is located on the Northern Waterfront of the City of San Francisco, between the Presidio and Fort Mason Center. It is approximately one and one-half miles east of Golden Gate Bridge and directly west of and adjacent to Fort Mason.

The Marina is composed of two harbors, the East Harbor and West Harbor, which are separated by the Marina Green, a large City park bordering San Francisco Bay. The Marina Green provides open space highly utilized for both passive and active recreational use. Part of the Marina facility, the Marina Green is situated between the East Harbor, West Harbor, and Marina Boulevard, and includes restrooms, a concession stand, and four parking lots. The East Harbor, also known as Gashouse Cove, is next to the western boundary of Fort Mason. The East Harbor consists of 343 boat slips, the City Yacht boat sales, parklands, a restroom, and two parking lots. The West Harbor includes the West Harbor marina area, the Saint Francis and Golden Gate Yacht Clubs, the Harbormaster's Building, and the Marina



Green. There are also 343 boats slips in the West Harbor area, bringing the total number of boat slips in the Marina to 676 (source: http://www.parks.sf.gov.org; accessed June 25, 2003). The Marina does not have a permit for liveaboard boats at this time, and boat owners are not allowed to live full-time on their boats (Personal Communication with Park Lee, San Francisco Marina, June 25, 2003).

Currently, the Marina's six parking lots offer free parking. However, the City is considering implementing paid parking as a means of generating additional revenues. This change in parking policy as well as other improvements at the Marina is the subject of an environmental document being prepared pursuant to the California Environmental Quality Act. The study is underway and the City's proposal and the environmental review are not expected to be completed until 2004.

Upper Fort Mason

Fort Mason is divided into two distinct areas. The Fort Mason Center (FMC) faces onto the waterfront and occupies Lower Fort Mason, while the upper part of Fort Mason is located above the waterfront and houses the



Gashouse cove (east harbor) at the San Francisco Marina



administrative buildings for the GGNRA. The FMC is the subject of the proposed action, while the upper part of Fort Mason is essentially the FMC's southerly and easterly neighbor, although the National Park Service owns both parts of Fort Mason. Figure 2-2 in Chapter 2, Setting, delineates Fort Mason's two areas.



Upper Fort Mason

The following organizations utilize upper Fort Mason:

- Golden Gate National Recreation Area (GGNRA) Headquarters
- Golden Gate National Parks Conservancy
- Home Away from Homelessness (Building 9)
- San Francisco Maritime National Park Association (Building 35)
- San Francisco Conservation Corps (Building 111)

- Fort Mason Community Gardens (Building 201)
- Hostelling International/Fisherman's Wharf (Building 240)

In addition to these administrative uses, Fort Mason Officers' Club is located in Building 1. The club is currently closed to the public as improvements are being planned.

Also in Upper Fort Mason is the Fort Mason Historic Leasing, which includes 20 rental housing units that are leased out to the public. This housing, which is currently at 100 percent occupancy, consists of single-family homes and duplex units that historically housed the Fort Mason Commanding General, Colonel's post, and officer's post.

CURRENT IMPACTS OF ACTIVITIES AT THE FMF ON SURROUNDING LAND USES

Approximately 1.6 million visitors visit the FMC each year. Most visitors attend events held in the Center's theater, conference center, or exhibit halls. During these events, the primary concerns affecting FMC's neighbors include parking, traffic, and occasionally noise.

Since 1977, the FMF has provided numerous cultural, educational, and recreational opportunities to the people of the Bay Area. Forty different organizations are currently tenants or "residents' of FMC, and with about 1.6 million annual visitors and events scheduled on 200 to 300 days per year, there is a high level





Upper Fort Mason

of activity at FMC. The FMF Director of Facilities and Client Services is responsible for Traffic Management. FMF has on staff an Event Coordinator who is responsible for the ongoing administration of a Transportation Demand Management program, the purpose of which is to regulate traffic and parking to reduce impacts at FMC and the neighboring community. The Event Coordinator coordinates with the Sales and Client Services Departments to plan and implement the appropriate traffic control and parking measures for each event. In scheduling and planning each event, FMC considers the expected attendance, the relationship to other planned events at FMC and elsewhere. If the number of attendees is anticipated to exceed the available parking at FMC, even with valet parking, FMC arranges for off-site satellite parking lots to be available and requires event sponsors to provide shuttle service between the satellite lots and FMC. The FMC sends out the parking impact forecasts and the special notices for large events to the adjacent neighborhood associations and groups.

FMC is located within a bustling area, with most noise generating from onsite vehicular circulation. FMF schedules events such that concurrent activities do not cause unreasonably large crowds or excessive traffic. FMF imposes restrictions on how late events extend into the evening to avoid disturbing nearby neighbors, and has been so effective in implementing these restrictions that the FMF has not received a noise complaint during its 25 years of operation. Piers One, Two, and Three experience ambient noise typical of a port setting, including foghorns, boat horns, and wave wash. Because the site is part of a National Park Service Unit, it must comply with NPS policy on protecting the natural soundscape.

RELEVANT POLICIES

As stated in the NPS's Golden Gate National Recreation Area General Management Plan (1980), the overriding management objectives defined by the NPS were:

- Preservation and restoration of natural resources,
- Preservation and restoration of cultural resources,

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- Making the recreation area readily available to the broadest variety of park users,
- Provision of a broad variety of park experiences, and
- Consideration of park neighbors (emphasis added).

Over the past quarter century, the programs, residents, and events sponsored and managed by FMF have honored and fulfilled the management objectives and development concepts articulated in the General Management Plan.



Marina district near Fort Mason Center

■ Environmental Consequences

NO ACTION ALTERNATIVE

Under the No Action Alternative, there would be little or no changes to existing land uses at FMC with little resultant effect on the Marina District. The FMF would continue to ensure that FMC

remains a cultural, recreational, and educational asset within the community, and that it enriches cultural and artistic life within the Bay Area. The FMF would continue to minimize negative impacts to the surrounding community if and when they occur.

Under the No Action Alternative, it is assumed that the current cooperative agreement would be extended under the existing agreement conditions. Thus, the same TDM controls and hours limitations to minimize traffic, parking, and noise impacts on the Marina District, the Marina Yacht Harbor, and upper Fort Mason would continue to be employed.

Under the No Action Alternative, renovation of Pier One would not likely occur within the foreseeable future because the NPS does not have necessary funding available. The pier would continue to be used primarily as a storage area and occasionally as a construction staging area. Visitor levels would not change substantially and would be similar to the numbers shown in Table 2-2. Because visitor levels would not change substantially, the adjacent land areas would not experience an increase in traffic or spillover parking related to FMF activities.

PARKING

Under the No Action alternative, parking would remain under control of the NPS and would likely remain free of charge, although not necessarily so. Under the No Action alternative, several parking scenarios are possible:



- Parking remains free of charge at the FMC and at the adjacent City Yacht Harbor
 - This scenario would be the least likely to have an impact on the surrounding neighborhood. There would be no change from current conditions.
- Parking remains free of charge at the FMC and the City Yacht Harbor begins charging

This scenario could occur under the No Action Alternative, although as described Section Transportation, it is unlikely that one agency would begin to implement paid parking without coordinated response from the other. The mitigation measure in Section 4.4 recommends that the City Yacht Harbor, the Presidio, and the FMF should set up an active mechanism for maintaining ongoing communication and coordination regarding the implementation of parking pricing. If this scenario did materialize, the demand for parking at FMC would increase and overflow parking into the surrounding neighborhood would occur, particularly on weekends when the permit parking restrictions are not applicable. Thus, this scenario would have some impact on the neighborhood, but the impact would result from an action by the City Yacht Harbor and not one initiated by FMF.

3. Paid parking is implemented at both the FMC and the City Yacht Harbor This scenario is possible under No Action Alternative, but is more likely to occur under the Preferred Alternative. This scenario is the one most likely to affect the neighborhood. This option is discussed below under "Preferred Alternative."

NOISE

Noise levels would not change dramatically as there would be little or no increase in construction activities. Events would continue to be regulated by FMF and hour limitations would be imposed. There is no housing at FMC and FMC is not directly bordered by any permanent housing. In addition, the hilly topography of upper Fort Mason to the east and south blocks noise transmission to the neighborhoods further to the south. Without increased utilization of FMC facilities, the number of visitors would not change substantially and traffic associated with visitors would not increase significantly enough to change perceptibly the ambient noise levels. The No Action alternative would result in a similar level of noise to current levels.

Preferred Alternative (Long-Term Lease)

The FMF would continue to ensure that FMC remains a cultural, recreational, and educational asset to the community. The increase of events and venues that can occur under the Preferred Alternative could increase impacts on the neighboring Marina District, but these effects

would be regulated such that the overall character and livability of the neighborhood would be minimally affected.

PARKING

Under the Preferred Alternative, two primary factors may affect the character and livability of the surrounding land uses: the development of Pier One and the implementation of paid parking.

First, Pier One may undergo seismic retrofit and be opened to the public. The renovation of Pier One would increase available square footage for residents and events at the FMC that would increase visitor levels by approximately 14.5 percent annually over current visitation levels. As discussed in Section 4.4, the use of Pier One has the potential to increase the number of "parking impact days," or days when the parking supply at FMC is fully utilized and offsite parking solutions are warranted. On these days there is also the potential for some intrusion of parkers into the nearby residential areas. This is particularly true on weekends, when neighborhood residential parking permit restrictions are not in force. The majority of the high parking impact days occur on weekend days. The observations of parking activity for both weekday and weekend conditions, conducted as part of the transportation analysis in this document indicate that the TDM measures used by the FMC are successful in limiting the amount of parking that overspills into the neighborhoods. Under the Preferred Alternative, FMC would continue to employ an Event Coordinator to manage the traffic implications of large events on FMC's neighbors.

Second, if paid parking is implemented as proposed under the Preferred Alternative in order to raise revenues, it could result in an increase in the number of vehicles parking on surrounding side streets. Paid parking is most likely to be implemented under the Preferred Alternative but could occur under the No Action Alternative. The impact would not be particularly noticeable during the weekdays when permit parking restrictions are in effect. These restrictions limit the number of hours that parkers may park on the streets, unless they have a permit. The permits can only be obtained by those that live in the neighborhood. On weekends, when the parking restrictions are not in effect, the on-street parking demand would be greater. In particular, some employees at the FMC may attempt to park in the nearby residential areas in order to avoid the fees. During weekdays, when the neighborhood permit parking restrictions are in force, this type of parking abuse would not be prevalent. On weekend days some parking intrusion into surrounding neighborhoods would be more likely. However, employees—who would be the most likely group to want to seek out free parking—are not a large portion of the population at FMC on weekend days.

NOISE

As discussed in Section 4.9, Topics Dismissed from Further Review, under the No Action Alternative, noise levels would not increase dramatically as a result of the Preferred Alternative. Although this topic was dismissed from further review, the following discussion explains why the Preferred Alternative would not affect urban quality with respect to noise.



Indirect noise increase could potentially occur from three kinds of activities: construction, increased activity at the FMC, and increased traffic on the surrounding streets. Although construction is anticipated under the Preferred Alternative, typical construction equipment and activity would be temporary and intermittent, and neighbors that could be disturbed by such activities are relatively distant from FMC. Additionally, construction-related noise would be subject to best management practices, including hour limitations, including the mitigation measures outlined in the Pier 2 EA, included in this document as Appendix E.

Aside from temporary impacts such as short periods of loud noise and periods when general construction would raise ambient noise levels for several hours at a time, excessive noise exposure would not be expected in adjacent neighborhoods, other than in the short term. Future construction activities and events would likely be controlled in the same manner already undertaken for the renovation of Pier Two. To date, after more than four months of construction, there have been no problems with noise effecting neighboring land uses and no significant problems at the FMC. Similar effects would be expected should Piers One and Three undergo seismic retrofit.

The opening of Pier One has the potential to increase visitor levels and events approximately 14.5 percent over current levels. Most events, classes, and exhibits occur indoors, so that noise effects on the surrounding neighbors are minimal. To the extent that more events are programmed as outdoor events, there could be an increase in noise levels for the duration of

the outdoor event. Increased visitor levels would also result in greater traffic volumes on the streets leading to FMC. Based on the traffic analysis of the Preferred Alternative as presented in Section 4.4 of this EA, traffic volumes would not increase by a magnitude sufficient to cause a change in the in ambient noise environment from vehicular trips.

Under both alternatives, the FMC would continue to comply with the General Management Plan's stated objective of being considerate of park neighbors.

MITIGATION MEASURES

Restrictions on Amplified Sound Systems. If outdoor events are held with amplified sound systems, the FMF ensures that the event sponsors direct the speakers to maintain noise levels at the nearest neighbors below 60 dBA.

Cumulative Effects

As discussed in Section 4.4, two major projects could have a cumulative effect on traffic in the FMC's neighboring areas: the planned reconstruction of the Doyle Drive and the Presidio Trust Implementation Plan for the Presidio. Neither of these projects would have any substantial effect on traffic in the vicinity of Fort Mason; therefore, the Preferred Alternative would not contribute to a cumulative effect.

■ Impairment of Park Resources and Values

Park resources and values related to urban quality would not be impaired under the Preferred Alternative, nor would they be impacted under the No Action Alternative.

4.7 Water Quality

■ Introduction

This section discusses current water quality in the San Francisco Bay, as well as applicable standards and policies related to water quality. Water quality impacts from construction and operation of activities outlined in the Fort Mason Center Long-Term Lease are discussed. The proposed federal action is a long-term lease, which would not trigger changes to the natural or human environments. Nevertheless, the lease would enable FMF to pursue funding for certain capital improvements, which then become more feasible. Accordingly, the Fort Mason Center Long-Term Lease could indirectly affect water quality through possible improvements at FMC such as the seismic retrofit of Piers One and Three, the renovation and seismic strengthening of other structures, and utility upgrades.

The NPS received one scoping comment letter related to water quality from the California



Foreground: San Francisco Marina Midground: Fort Mason Center Background: Downtown San Francisco



Department of Fish and Game, which requested that the EA discuss potential for pollution from construction activities (e.g., use of petroleum products, cleaning agents, etc.). The letter also requested that the EA discuss whether the rehabilitation of historic structures at Fort Mason, a set of activities that could occur under the Fort Mason Center Long-Term Lease, may include the use of materials that are deleterious to aquatic and terrestrial species. Potential impacts from hazardous materials and the regulations governing use and transport of hazardous materials are addressed in the Fort Mason Center Long-Term Lease Environmental Screening Form, summarized in Section 4.9 of this document. Information on the potential removal of creosote-treated fender piles is included in Section 4.8, Marine Life, of this EA. Most of the information in this section was derived from the Water Resources sections of the Pier 2 EA, as water quality impacts from the seismic retrofit of Piers One and Three would be similar to the impacts to water quality from the Pier Two project. Other sources of information included the American Fisheries Society and the San Francisco Estuary Institute, Regional Monitoring Program. Full reference information is included in Chapter 7.0, References. It should be noted that the Pier 2 EA project description was revised to reflect resource agency concerns regarding pile driving. Although the seismic retrofit of Piers One and Three may not include batter pile driving, given that the project specifications are unknown, pile driving impacts are discussed below.

Setting

This section discusses the tides and currents in the Bay, water depth, and water quality, including suspended solids and pollutants. San Francisco Bay is generally divided into three different areas: North Bay, South Bay, and Central Bay. The piers at Fort Mason extend into the portion of San Francisco Bay known as Central Bay.

REGULATORY FRAMEWORK

The California Water Resources Control Board and its regional offices (RWQCB) are responsible for enforcing water quality standards within the State, and FMC is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board. As mandated by Section 303(d) of the federal Clean Water Act (CWA), the RWQCB maintains and updates a list of "impaired waterbodies" that do not meet State and federal water quality standards. The Central Bay is listed as an impaired waterbody because of several pollutants, as discussed further below. The RWQCB also establishes priority rankings for waters on the list, and develops action plans, called Total Maximum Daily Loads (TMDL), to improve water quality. The list of impaired water bodies is revised periodically (typically every two years), and the San Francisco 2002 Revised 303(d) list was adopted by the State Water Resources Control Board on February 4, 2003. The revised list is now undergoing review by the U.S. Environmental Protection Agency. In addition, the RWQCB is required to develop, adopt, and implement a Water Quality Control Plan (Basin Plan) for the San Francisco Bay



region. The Basin Plan is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the San Francisco Bay region. The Basin Plan, first adopted in 1968, was most recently updated in 1995. As required, the Basin Plan includes a statement of beneficial water uses that the Regional Board will protect, the water quality objectives needed to protect the designated beneficial water uses, and the implementation plans for achieving the water quality objectives through its regulatory programs.

TIDES AND CURRENTS

According to background information provided in the Pier 2 EA, tides in San Francisco Bay are mixed semi-diurnally, with two highs and two lows of different elevation each lunar day. The tidal range in the project vicinity is approximately 6 feet, from approximately 3 feet above mean sea level to 3 feet below mean sea level (URS 2002).

Water flow, or circulation in the project area, and in San Francisco Bay in general, is primarily tidally driven. This flow may be an order of magnitude lower than tidal circulation. Maximum tidal current velocities near the Golden Gate Bridge range from approximately 4.9 feet/second on a flood (incoming) tide to 6.5 feet/second on an ebb (outgoing) tide. Average tidal velocities in the channel would be much lower, and near-shore velocities (e.g., near Piers One and Three) would be lower still as current

speeds decrease at shallower near-shore depths. Circulation beneath the piers is limited somewhat by the fender piles that surround the pier, and the existing caissons (URS 2002).

WATER DEPTH

Water depths below Pier Two range from approximately 20 feet below mean lower low water (MLLW) at the near shore end of the pier, to approximately 30 feet below MLLW at the offshore end of the pier. The pier is located on a relatively shallow shelf along the northern tip of the San Francisco peninsula. Water depths bayward from the end of the pier drop steeply from about 30 feet upwards of 100 feet in the channel area between Alcatraz Island and the Golden Gate Bridge (URS 2002). It can be assumed that, given the proximity of Piers One and Three to Pier Two, water depths would be very similar for the three piers.

WATER QUALITY

The San Francisco Estuary Institute (SFEI) administers a Regional Monitoring Program (RMP) on behalf of the San Francisco Regional Water Quality Control Board (RWQCB) and a group of Bay Area dischargers. The RMP has been monitoring surface water quality throughout the Bay since 1993. Program funding is provided by dischargers and State and federal government organizations. RMP stations closest to the project include Yerba Buena Island and Richardson Bay. The RMP also includes sampling near the southern terminus of the Golden Gate Bridge (SFEI, 2001). These Central Bay monitoring stations



tend to report lower concentrations of contaminants than do other parts of the Bay, particularly the Southern Bay.

SUSPENDED SOLIDS

Presence of suspended solids in the water column reduces the penetration of light into the water, which has numerous harmful effects on aquatic ecosystems. Reduced light transmission can reduce photosynthesis of submerged plants, which can have negative consequences all the way up the food chain. In addition, suspended solids can be detrimental to bottom-dwelling filter feeders and impair the ability of visual feeders to find their prey. Suspended solids can clog fish gills and other respiratory membranes and smother embryos by coating them with particles (AFS 2003).

There are currently no numerical water quality objectives in San Francisco Bay for suspended sediment concentrations; however, the narrative objective in the Basin Plan states that "waters shall not contain suspended materials in concentrations that cause nuisance or adversely affect beneficial uses." As previously described, effects of increased suspended sediments, such as gill lacerations and decreased oxygen consumption in fish, are usually apparent at very high concentrations (e.g., 1,500 mg/L) associated with dredging activities (URS 2002). According to the SFEI RMP, suspended solids concentrations tend to be lower in the Central Bay than in other parts of San Francisco Bay. Total suspended solids in the Central Bay ranged from about 2 milligrams per liter (mg/ L) to 15 mg/L measured at Yerba Buena Island and the Golden Gate RMP stations (URS 2002).

The Central Bay is not on the 2002 CWA Section 303(d) list of impaired waterbodies for suspended solids (SFB RWQCB 2003), and suspended solids are not currently a major issue of concern in the Central Bay.

POLLUTANTS

Trace inorganic elements, such as metals, occur naturally in the Bay but levels are increased by industrial and municipal discharges and from stormwater runoff. Stormwater runoff appears to be the largest source of these pollutants to the Bay. Some metals are toxic to organisms or bioaccumulate organisms. can in Concentrations of several inorganic elements commonly exceed water quality objectives in the North and South Bay areas but rarely exceed water quality objectives in the Central Bay. However, the Central Bay is on the CWA 303(d) list of impaired waterbodies for eleven pollutants. Of these pollutants, two are considered to be high priority by the RWQCB for developing TMDLs that would ultimately reduce pollutant impacts. These are mercury and non dioxin-like PCBs. Of medium priority are exotic species, which alter the natural food chain and species composition of the Bay. Of low priority are chlordane, DDT, diazinon, dieldrin, dioxin compounds, furan compounds, dioxin-like PCBs, and selenium.

As part of the RMP, pollutant concentrations in San Francisco Bay are routinely collected, including inorganic metals and organic compounds such as pesticides, polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), and petroleum hydrocarbons. RMP monitoring results support

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the SWRCB's prioritization of TMDL development in the Central Bay; namely, the RMP has recorded Central Bay failures to meet water quality objective for PCBs and mercury. The Golden Gate monitoring station reported levels that were above the guideline for mercury in July 2001 (SFEI 2001), while the RMP has measured occasional exceedances of the PCB objective (0.00017 parts per billion) during the period from 1996 to 1999 at all San Francisco Bay RMP stations, including Central Bay stations (URS 2002). Although the Yerba Buena and Golden Gate RMP sampling locations have reported above-guideline concentrations of PCBs, PCB concentrations tend to be lower in the Central Bay than other Baywide locations.

FORT MASON CENTER INFRASTRUCTURE

Storm drainage and sewerage at the FMC is provided through two systems, both of which have the potential to affect water quality in the San Francisco Bay. First, a Combined Gravity (CG) Sanitary and Storm Drainage System services all FMC buildings, in addition to runoff from the catch basins along the east and west sides of the site. The CG system collects and discharges sanitary sewage and storm drainage into a City Combined Box Sewer located in the southwest corner of the FMC. Secondly, a Storm Water Drainage (SD) only system services the stormwater catch basins within the central portion of the site. The SD system discharges into the Bay via a 48-inch concrete pipe outfall. Stormwater catch basins along and between the piers discharge directly into the Bay (Rutherford & Chekene 1999).

While currently functioning effectively, the CG system and the SD system are at least 40 years old, and a site utilities investigation performed by Rutherford & Chekene Consulting Engineers in 1999 recommended that a long-term maintenance and replacement plan be implemented over the next 5 to 15 years (2004–2014). "Due to the proximity of the site to San Francisco Bay, sections of the CG system showing potential for serious leakage should receive first priority attention and be replaced within the next 5 to 10 years" (2004–2009). The report also provided recommendations for the continued operation and rehabilitation of the SD system.

■ Environmental Consequences

NO ACTION ALTERNATIVE

The No Action Alternative would have a negligible, long-term adverse effect on water quality, and would contribute to a minor, long-term adverse cumulative effect on water quality. Because this alternative assumes that the seismic retrofit of Piers One and Three may not occur as quickly as under the Preferred Alternative, the No Action Alternative could lead to a major, short-term adverse effect on water quality in the event of a pier collapse. Long-term deferred maintenance could also lead to the degradation of the utilities and the potential for impacts.

WATER CIRCULATION AND QUALITY

The No Action Alternative would have no effect on water circulation or water quality related to continued operation of FMC under the cooperative agreement or from construction activities that FMF might undertake. Currently,



the NPS is responsible for the upkeep and maintenance of the substructure of Piers One and Three, while FMF is responsible for the structures atop the piers. The NPS has no scheduled improvements to either of the substructures, despite a structural assessment indicating that the present lateral system for the pier structure do not comply with the practice observed by NPS (described in FEMA 178, a federal document identifying seismic safety standards) and would not perform well when subjected to ground motion (Rutherford & Chekene 1999). Consequently, continued deterioration of the structural elements of Piers One and Three (fender piles, concrete, etc.) would be expected, and this gradual deterioration would have a localized, long-term effect on water quality due to increased turbidity. Without seismic retrofit of Piers One and Three, the piers would continue to deteriorate. In the event of a major earthquake, Piers One and Three in could collapse resulting in potential water quality impacts to the Bay. The nature and severity of potential impacts would depend on the types of materials on the piers during such an event and potential discharges to the Bay resulting from spills or broken sewer lines. It is more likely under the No Action Alternative that an earthquake would lead to sewage spills; in an earthquake pipes could break even without pier collapse and deferred maintenance could lead to degraded utilities that are more likely to leak.

In addition, under the No Action Alternative, it is less likely that upgrades to existing systems recommended in the 1999 Site Utilities Investigation, namely to storm drainage and sewer systems, would occur. Given the age of

the current systems, they would continue to deteriorate and may reach a point where they no longer function effectively. Failures of these systems, particularly the sewer lines, would have a major, localized, short-term effect on water quality in the near-shore environment.

CUMULATIVE IMPACTS

The No Action Alternative would contribute to a minor, long-term adverse effect on water quality when considered along with other in-Bay construction projects. If a major earthquake occurred and the unreinforced pier collapsed, it is expected that local water resources would be adversely affected by other in-Bay structure failures, resulting in a major, short-term, adverse cumulative effect on water quality.

Preferred Alternative

The Preferred Alternative would have localized and minor, short-term and cumulative adverse impacts on water quality, the severity of which would be reduced to negligible with implementation of mitigation measures.

The NPS has requested funding for the seismic retrofit of the substructures of Piers One and Three, but has not received funding to date. Detailed project plans have not been developed; however, the project may be similar to the ongoing Pier Two retrofit. The Pier Two retrofit will inform the retrofit of Piers One and Three; that is, lessons learned from the Pier Two retrofit will inform the process for retrofitting of Piers One and Three. Depending on the Pier Two retrofit experience, the retrofit of Piers One and Three would receive further environmental



review that may involve analysis at the categorical exclusion, environmental assessment, or environmental impact statement level. Relevant agencies would be contacted prior to the retrofit of Piers One and Three, including U.S. Army Corps of Engineers, San Francisco Regional Water Quality Control Board, National Marine Fisheries Service, California Department of Fish and Game, and the San Francisco Bay Conservation and Development Commission.

WATER CIRCULATION

Tides and currents are affected by the in-Bay structures at FMC; namely, the piers. Circulation under the piers is slightly constrained due to the existing fender pile system. Under the Fort Mason Center Long-Term Lease, the FMF hopes to improve the existing system. Because the new fender pile system would be similar to the existing system, water circulation patterns in the local area would not be altered substantially from existing conditions.

WATER QUALITY

The long-term lease enables the FMF to pursue fundraising activities, which if successful, enhances the feasibility that utility upgrades and seismic retrofit of the piers and other structures are more likely to be undertaken. The Fort Mason Center Long-Term Lease, thus, has an indirect potential to affect water quality in San Francisco Bay. As described in Chapter 3, Alternatives, certain infrastructure improvements are more likely to occur under the long-term lease than without the lease, as the long-term lease enables the FMF to pursue

fundraising activities that could ultimately fund such improvements. Upgrading of the FMC's combined gravity and storm drain systems under the Preferred Alternative would have a beneficial effect on water quality in that existing leaks from the 40-year old systems would be corrected.

With respect to potential seismic retrofit of Piers One and Three, construction activities that could potentially impact water quality include (1) stormwater runoff from construction occurring during the Fort Mason Center Long-Term Lease, (2) accidental spills during construction, (3) potential demolition and underdeck cleaning and repairs during retrofit of Piers One and Three, and (4) potential pile driving associated with retrofit of Piers One and Three.

Stormwater Runoff

Under the Fort Mason Center Long-Term Lease, building footprints would not change nor would impervious surfaces. As a result, stormwater runoff rate and flow would remain unchanged from current conditions. However, if construction activities were underway, associated with an improvement made more feasible by the Fort Mason Center Long-Term Lease, then the Preferred Alternative could result in construction-related stormwater runoff that could cause short-term adverse impacts to water quality, ranging from minor to moderate in severity. Although the project area is completely paved and construction-related sediment discharge in stormwater is not anticipated, debris would be generated during the project and the activities would include use of potential pollutants, such as paint and fuel.



Depending upon the a stormwater pollution prevention plan (SWPPP) may or may not be required under the National Pollutant Discharge Elimination System program of the federal Clean Water Act and NPS policy dictates that an internal stormwater pollution prevention plan generally be prepared for construction projects. This plan would include stormwater best management practices to minimize potential for water quality impacts. These may include covering potential contaminants or erodible materials stockpiled during construction and storage of potential pollutants (e.g., paint, grouting materials, fuels, etc.) with proper containment and out of areas where contact with stormwater runoff can occur. All potential contaminants should be addressed under the plan.

Accidental Spills

Adverse water quality impacts could occur if fuel or other toxic materials are accidentally spilled into the Bay during construction. Depending on the size of a potential spill and the material spilled, water quality impacts could range from minor to major. However, with implementation of the best management practices outlined below (under "Mitigation Measures"), potential impacts would be negligible. In addition, the Golden Gate NRA Emergency Response Plan applies to Fort Mason. The Emergency Response Plan, published in September 1996, establishes policies and procedures for National Park Service response to disasters, including hazardous materials release.

Demolition and Preparation

Activities undertaken during demolition and preparation that may impact water quality include demolition of under-pier utilities and removal of loose concrete and rust, typically by using power-driven abrasive wheels or sand blasting. Concrete and other debris generated from these activities would normally be collected on barge work platforms beneath the pier (encapsulation is not practical given the marine environment and the shifting tides). Protective measures would be needed to protect water quality to ensure that construction materials and debris would not fall into the Bay. The same mitigation measures intended to protect debris from contact with stormwater should provide protection from wind (e.g. covering stockpiled debris with tarps or storing in contained area). According to the Pier 2 EA, the use of underwater jet washing of marine growth from the caissons and the seawall would have negligible water quality effects. No chemicals are used in the removal process and inorganic debris is not likely to be dislodged by the spray. The increase of organic debris in the water column would be temporary and would likely settle or drift away quickly. These impacts would be applicable to the Fort Mason Center Long-Term Lease should seismic retrofit of Piers One and Three occur during the lease term.

Pile Driving

Although the proposed action is a new lease agreement between the FMF and NPS, lease terms could facilitate seismic retrofit of Piers One and Three, which could include pile driving as a project component. According to the Pier 2

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EA, the initial placement and driving of piles would result in minor, localized increases in suspended sediment concentrations in the water column. These impacts would be applicable to the Fort Mason Center Long-Term Lease should seismic retrofit of Piers One and Three occur during the lease term. The increases would be short term, as sediment would likely settle out of the water column within hours of the placement and driving of each pile. Under the Preferred Alternative, sediment would not be excavated within open waters, and sediment resuspension during placement and driving of piles would be minor and localized (URS 2001).

MITIGATION MEASURES

Construction activities related to the potential renovation of Pier One and Pier Three could adversely affect water quality. Water resource mitigation measures included in the Pier 2 EA, or equivalent measures, would be applicable if renovation of Piers One and Three were take place during the lease term. If the construction method or techniques for the renovation of Piers One and Three differ substantially from the Pier Two renovation, such that these measures may not afford the same assurance of water quality additional protection, then documentation and measures may be warranted. Mitigation measures that would reduce impacts to water quality include

1. Construction Best Management Practices to Control Construction Debris. Effects of construction will be evaluated at the design stage; however, future work will be consistent with the Pier 2 EA,

including that no construction debris enters bay waters, as required by the Regional Water Quality Control Board. The specific means by which this mandate is achieved will be left up to the general contractor with approval and oversight provided by the National Park Service. Means should include best management practices set forth in the California Stormwater Best Management Practices Handbooks, which may include the use of vacuum recapture devises during sandblasting, and the installation of containment netting, scaffolding, or a false bottom under the pier during demolition activities.

- 2. Installation of Barriers to Prevent Surface Runoff. Impermeable barriers or dikes shall be installed at the edge of all pier aprons and the adjacent seawall prior to starting construction, to prevent surface runoff from entering bay waters.
- 3. Construction Best Management Practices to Control Releases of Water Quality Contaminants. Potential contaminants and erodible materials stockpiled on deck aprons, barges, or within 100 feet of the shoreline shall be covered with tarps during construction, and potential pollutants (e.g., paints, grouting materials, fuels, epoxy resins, etc.) shall be stored with proper containment and outside of areas where contact with stormwater runoff or bay waters could occur.



In addition, as with the Pier Two seismic retrofit, prior to retrofit of Pier One and/or Pier Three, NPS would be required to obtain a Conditional Water Quality Certification from the San Francisco Regional Water Quality Control Board. NPS would also be required to obtain CWA Section 404 authorization from the Army Corps of Engineers. NPS and FMF would adhere to conditions required by permitting agencies, including:

- The U.S. Army Corps of Engineers' Nationwide Permit Program, specifically Nationwide Permit No. 3 (Maintenance) under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act,
- The California Regional Water Quality Control Board, San Francisco Bay Region, related to their Conditional Water Quality Certification and Waiver of Waste Discharge Requirements (Section 401 of the Clean Water Act), and
- The National Marine Fisheries Service set forth as part of their informal Section 7 (Endangered Species Act) consultation process.

CUMULATIVE IMPACTS

Several projects are occurring or may occur within the foreseeable future that could affect water quality in the vicinity of FMC during the long-term lease. Although funding is not yet secure, the San Francisco City Yacht Harbor, adjacent to FMC, plans to remodel, replace and

reconfigure all of the boat berths in both harbors- east harbor and west harbor, with a net result of fewer total berths. The City of San Francisco Department of Public Works, who is retained by the Marina to manage this project, would build three breakwaters, one of which would be adjacent to Fort Mason within the east harbor. If the project receives funding as planned, construction would be completed by approximately the end of 2007 (personal communication via telephone with Edgar Lopez, DPW, July 29, 2003). In addition, the U.S. Army Corps of Engineers (USACE) utilizes three disposal sites for the placement of dredged materials within the San Francisco Bay region (Carquinez Strait, San Pablo Bay, and Alcatraz Island). Approximately 80 percent of dredged material in the region is disposed of at these three in-bay sites. The Alcatraz Island site is located about 1.5 miles north of Fort Mason (800 feet south of Alcatraz Island) and is the closest of the three sites to Fort Mason Center. The Alcatraz Island disposal site is the most heavily used, receiving approximately 2 million cubic yards of sediments per year. (URS 2002; and personal communication with Jim Delorey, Physical Scientist, DMMO, USACE, June 27, 2003). Finally, sand mining has been occurring at Nearby Point Knox and Alcatraz Shoals for more than 25 years. In 2001, Olin Jones Sand Company was granted a 10-year USACE permit to dredge sand from three tracts of land on Point Knox Shoal, near Angel Island in Central San Francisco Bay (about 3.5 miles north of Fort Mason). The purpose of this dredging is to obtain commercial grade sand for sale. The sand would then be used for construction projects throughout the Bay Area. The applicant proposes to remove up to 400,000



cubic yards of sand annually from three tracts located north of Angel Island within Raccoon Strait; northwest of Angel Island, encompassing the area of Shag and Harding rocks; and south of Angel Island, near its shore. Sand would be removed from these tracts and transported by barge to established sand yards (personal communication with Phil Shannin, Senior Project Manager, USACE, DMMO, north section, June 27, 2003).

According to the Pier 2 EA, to the extent that the preferred alternative would contribute to a cumulative impact on water resources, it would be a localized effect occurring in the immediate vicinity of the Fort Mason piers. Bay dredging and sand mining activities are occurring at least 1.5 miles from the piers, and are therefore not considered in the cumulative context for water resources. Projects that are occurring at the FMC (e.g., seismic strengthening of Pier Two and other structures) would be subject to the same water quality protection restrictions as the Preferred Alternative, including prohibition from discharging construction debris or pollutants into bay waters. Projects occurring near the FMC, including the proposed breakwater at the San Francisco Marina Yacht Harbor may contribute to cumulative water quality impacts should construction of the breakwater occur simultaneously with seismic retrofit of Pier One or Pier Three. This alternative would therefore contribute to a minor to moderate, short-term adverse cumulative affect to water resources.

■ Impairment of Park Resources

The No Action Alternative would have a negligible, long-term adverse effect on water quality and would contribute to a minor, long-term adverse cumulative effect on water quality. In the event of a pier collapse, there would be a major, short-term adverse effect on water quality; however, the No Action Alternative would not impair park resources or values related to water resources.

The Preferred Alternative would have localized and minor, short-term and cumulative adverse impacts on water quality, the severity of which would be reduced to negligible with implementation of mitigation measures. The expected level of impact to water resources would not constitute an impairment of park resources or values.

4.8 Marine Life

■ Introduction

Marine life resources found in the project area include plankton, fish, benthic organisms, birds, and marine mammals. Birds are included in this "marine life" section because the majority of the species discussed here are dependent on the ocean, primarily for feeding. Two marine habitat types, open water and benthic habitat, occur in the project area. "Benthic" habitat refers to the bottom of the sea, while "open water" habitat refers to the water column. These habitats and associated fauna are discussed in the following section. In addition, special-status species are discussed in this section.



As previously described, the proposed federal action is a long-term lease, which would not directly trigger changes to the natural or human environments. However, the Fort Mason Center Long-Term Lease may enable NPS to fund certain capital improvements, including the seismic retrofit of the substructures of Piers One and Three, which could indirectly affect marine life. Although water quality impacts may result from other construction activities, such as the renovation and seismic strengthening of other structures and utility upgrades, these impacts would be mitigated, as discussed in Section 4.7, Water Quality, and would not affect marine life. Although implementation of waterborne ferry service at Fort Mason is feasible under the longterm lease, that project is too speculative at this time to evaluate its impacts.

The information in this section comes primarily from the Pier 2 EA. Additional data sources include the US Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFG), and the California Natural Diversity Database (CNDDB). It should be noted that the Pier 2 EA project description was revised to reflect resource agency concerns regarding pile driving. Although the seismic retrofit of Piers One and Three may not include batter pile driving, given that the project specifications are unknown, pile driving impacts are discussed below.

The NPS received two scoping comment letters related to marine life and special-status species from the CDFG and the USFWS. CDFG's letter requested that the EA identify and evaluate activities in the construction and operational phases of the project that may impact fish and

wildlife populations or their habitats, energy supplies, and reproductive requirements. The letter also requested an assessment of flora and fauna within or adjacent to the project site, especially special status species, and an analysis of potential impacts to these species from seismic retrofit of Piers One and Three, including impacts from noise, habitat loss, and pollution from construction. Furthermore, CDFG requested information on potential effects to the Pacific herring. USFWS' letter provided species lists of potentially occurring flora and fauna in the project vicinity and stated that a trained biologist should evaluate whether the project site contains habitat suitable for any of these special status species and whether the proposed project would affect any such species. The USFWS letter also explained circumstances under which federal permits or Endangered Species Act consultations would be required.

Setting

OPEN-WATER HABITAT

Plankton

Plankton are very small, free-floating or feebly swimming plant and animal species that form the base of the food chain in the water column. Photosynthetic phytoplankton (plants) serve as primary producers and are important to the growth and production of many organisms, including clams, worms, mussels, and zooplankton. Zooplankton are a major food source for fish and benthic organisms. Some zooplankton are larval or very immature stages of larger animals, including fish, jellyfish, squid, crabs, and sea stars, while some zooplankton



are single-celled animals, like foraminifera and radiolarians and other zooplankton are tiny crustaceans, like Daphnia. Phytoplankton growth and production are primarily controlled by light in the Bay, whereas zooplankton populations are influenced by phytoplankton abundance and grazing by benthic species.

Fish

Fish species are separated into two categories: resident and seasonal species. According to the Pier 2 EA, resident species that would likely occur in the project area include surfperch (e.g., barred, shiner, and pile surfperch), flatfish (e.g., speckled sanddab, starry flounder, and English sole), goby (e.g., yellowfin and Bay goby), sharks and rays (e.g., leopard shark, brown smoothhound, and Bay ray), topsmelt, white croaker, staghorn sculpin, and midshipman. Seasonal fish species that may occur in the project area include Pacific herring, northern anchovy, striped bass, and California halibut. Chinook salmon, discussed further under "Special Status Species" below, migrate through the Golden Gate to and from upstream spawning areas and may occur sporadically in the project area. Pacific herring and northern anchovy are the most abundant of the seasonal species in the San Francisco Bay, and have a strong likelihood of occurring in the project area (URS 2002).

Pacific herring is an important commercial species in San Francisco Bay. Herring lay their eggs from November to March on hard substrates, algae, and eelgrass. Piles in the project area may be used as a substrate for herring to attach their eggs. In San Francisco

Bay, herring are known to commonly spawn in near-shore areas along San Francisco and to the north in Richardson Bay (URS 2002).

Birds

The open-water habitat in the project area is used by many species of birds, including grebe (Clark's and western grebes), California brown pelicans, American coot, and ducks. Pigeon and gulls are present year round and likely use Piers One, Two, and Three for resting and shelter. The piers are not key habitat for any bird species, and large numbers of bird species do not occur in or around the project area at any time of the year (URS 2002).

Benthic Habitat

Benthic habitat in the project area consists of soft bay mud beneath and surrounding Piers One, Two, and Three. Benthic invertebrates in this habitat include infauna, which live in the sediment, and epibenthic macrofauna, which are larger mobile organisms that live on the surface of the sediment. In a study of soft bottom benthos in San Francisco Bay, the average abundance of infauna in the Central Bay was 472 animals per 0.1 square meter. Infauna in the project area are likely to include polychaete worms, amphipods, isopods, and clams. Macrofauna occurring in the area may include Bay shrimp, Dungeness crab, and other species of crabs. Benthic habitat under Piers One and Three is likely degraded due to the timber fender piles that surround the piers. Decreased water circulation, decreased sedimentation, and decreased light from the existing fender piles may impact species diversity, numbers, and



biomass under the pier compared with more open soft bottom habitats in the Bay (URS 2002).

Special-Status Species

Special-status species are those species that are listed as threatened, endangered, or as candidate species by the state or federal Endangered Species Acts, or protected under the Migratory Bird Act or the Marine Mammal Protection Act. Known occurrences of special-status species that have the potential to occur in the project area were identified from the following sources:

U.S. Fish and Wildlife Service (USFWS) list of sensitive species that may occur in San Francisco North U.S. Geological Survey 7.5 minute quadrangle

California Natural Diversity Database (CNDDB) search of the San Francisco North U.S. Geological Survey 7.5 minute quadrangle

As the FMC is completely paved, no habitat for special status plants is available. Consequently, this description of sensitive biological species does not include special status plant occurrences.

Special Status Fish

Chinook salmon and steelhead are migratory fish that, as adults, move into the Bay and to natal tributaries to spawn. As juveniles, they move from tributaries back to the ocean to mature. Migration routes for adults and juveniles are not well known in the San Francisco Bay, but Chinook and steelhead are

known to use the Central Bay as a migratory corridor. Shallow and intertidal habitat around the Fort Mason Piers does not contain rearing and foraging habitat for Chinook or steelhead juveniles and adults (URS 2002).



Chinook salmon

Special Status Birds

The double-crested cormorant is widespread in the San Francisco Bay and Delta. Cormorants utilize shallow waters overlying bottom relief for foraging, and frequent areas such as salt evaporation ponds, the rivers and sloughs tributary to San Francisco Bay, and tidal areas associated with Angel Island and Raccoon Straits. Cormorants are colonial breeders known to concentrate in the North Bay salt evaporators near Napa, the Richmond and Oakland Bay bridges, and the Dumbarton Bridge. The birds radiate outward from these colonies to forage at distances of 20 or more miles away, and may forage near the FMC, although nesting habitat is not present at the project site (URS 2002).

Brown pelicans are common around the deeper waters of the San Francisco Bay, including salt evaporation ponds and the mouths of larger creeks and are likely found foraging in the



Double-crested cormorant

Central Bay near the project site. This species breeds colonially, constructing its nests on the ground or, more commonly, in trees and shrubs and is known to nest on small islands such as Red Rock and breakwaters such as Alameda Naval Air Station. Nesting habitat is not present at Piers One or Three (URS 2002). It should be noted that although Florida and east coast populations of the brown pelican were de-listed (taken off of the Endangered Species List) in 1985 due to recovery, California populations of the brown pelican remain classified as endangered.

Table	4.9-1 Special	Status Animal	Species	
	Potentially	Occurring in F	Project Area	
Name	Scientific Name	Status	Potential Occumence in Study Area	_

Common Name	Scientific Name	Status	Potential Occurrence in Study Area
Winter-run Chinook salmon	Oncorhynchus tshawytscha	FE/SE	Potential to occur
Spring-run Chinook salmon	Oncorhynchus tshawytscha	FT/ST	Potential to occur
Fall/late fall-run Chinook salmon	Oncorhynchus tshawytscha	PE/SC	Potential to occur
Central California steelhead	Oncorhynchus mykiss	PE/SC	Potential to occur
Double-crested cormorant	Phalacrocorax auritus	SC	Potential to occur
California brown pelican	Pelecanus occidentalis californicus	FE/SE	Known to occur
California black rail	Laterallus jamaicensis conturniculus	SE	Not likely to occur
Bank swallow	Riparia riparia	ST	Not likely to occur
California sea lion	Zalophus californicus	Р	Potential to occur
Pacific harbor seal	Phoca vitulina richardsi	Р	Potential to occur
Southern sea otter	Enhydra lutris nereis	FT/P	Potential to occur
Angel island mole	Scapanus latimanus insularis	sc	Would not occur (found only on Angel Island)
California red-legged frog	Rana aurora draytonii	FT/SC	Not likely to occur
Mission blue butterfly	Icaricia icarioides missionensis	FE	Not likely to occur
Bay checkerspot butterfly	Euphydryas editha bayensis	FT	Not likely to occur
Monarch butterfly	Danaus plexippus	N/A	Potential to occur

Status Codes:

FE= listed as Endangered under the federal Endangered Species Act

FT= listed as Threatened under the federal Endangered Species Act

SE= listed as Endangered under the State Endangered Species Act

ST= listed as Threatened under the State Endangered Species Act

PE= proposed for listing as endangered

PT= Proposed for listing as threatened

SC= California State species of special concern

P= Protected under the Marine Mammal Protection Act

Sources: CNDDB January 2003; URS 2002



California black rails, which nest in tall grasses or marsh vegetation, are found in the North Bay and occasionally in Suisun Bay (Evans 1999). Suitable habitat for black rails is not present at the project site due to the lack of extensive pickleweed and/or bulrush habitat, and the lack of suitable high tide refugia (URS 2002). Bank swallows require riparian habitat (CNDDB 2003) and are not likely to occur in the project area.

Marine Mammals

No marine mammal species are expected to use the FMC as haul out sites, although the California sea lion, harbor seal, southern sea otter, and other marine mammals likely utilize open water habitat near the FMC. California sea lions and harbor seals are known to forage in deeper waters in the project vicinity and to haul out at several locations in the Central Bay. California sea lions are known to haul out at Pier 39 (approximately one mile east of the project site) in the Fisherman's wharf area, and occasionally Angel Island. Known haul out sites for harbor seals in the Central Bay include Sausalito, Angel Island, and Yerba Buena Island (URS 2002). The southern sea otter, which requires canopies of giant kelp and prefers rocky substrates, may occur in the project area. This species is not usually found north of Ano Nuevo in San Mateo County, although it has been observed near the Golden Gate and near Sausalito Point (CNDDB 2003).

Other Special Status Species

Although recorded often within the San Francisco North USGS quadrangle, the

California red-legged frog is not likely to occur within the project area. California red-legged frogs inhabit lowlands and foothills near permanent sources of fresh water, and no such habitat is present at the FMC. The mission blue butterfly, which inhabits grasslands and requires one of three larval host plants, would not occur in the project area due to lack of habitat. The bay checkerspot butterfly, which is restricted to native grasslands underlain by serpentine soil, would not occur in the project area due to lack of habitat. During the fall of 1990, several hundred monarch butterflies were observed clustering at the upper part of Fort Mason (not the FMC) behind the NPS headquarters building. However, the site was checked in winter 1992/93, but no monarchs were clustered. Likewise, the site was rechecked on January 6, 1996, and again, no monarchs were observed. Although the monarch is included in the CNDDB, it is not listed or proposed for listing under the federal or State Endangered Species Acts (CNDDB 2003).

■ Environmental Consequences

NO ACTION ALTERNATIVE

The No Action Alternative would have no direct effect and would not contribute to a cumulative effect on wildlife and aquatic life, including special-status species. If the unreinforced pier collapsed, this alternative would incur a moderate to major, short-term adverse effect, and a moderate to major, short-term adverse cumulative effect on wildlife and aquatic life would occur. However, pier collapse would not likely adversely affect special-status species, either indirectly or cumulatively.



Without seismic reinforcement or structural repair of Piers One and Three, the piers would continue to deteriorate, and would ultimately be partially or wholly closed to the public for safety concerns. This closure would not adversely affect wildlife or aquatic life in the area.

The potential collapse of Piers One and/or Three; however, would result in a direct loss of benthic habitat and injury or death to invertebrates, fish, or marine mammals in the immediate area. The collapse of the piers' structure, deck, and buildings could also create a temporary but substantial turbidity plume (an area of water that carries more suspended sediment than surrounding water) that would result in the suffocation and smothering of fish and invertebrates in the vicinity. Benthic organisms would be adversely affected. Additionally, unknown deleterious impacts to birds, fish, and invertebrates, and marine mammals would result from breakage of sewer lines and spillage of potentially toxic materials that may be contained within the on-site buildings and make up the pier facilities. Adverse impacts to fish and wildlife in the vicinity of the site due to the potential collapse of Piers One and Three would range from moderate to major and would occur in the short term.

With respect to special-status species, the No Action Alternative is less likely to involve pile driving, thereby avoiding impacts to special-status species. Adverse impacts to special status species in the vicinity of the site due to the potential collapse of Piers One and Three would range from minor to moderate and would occur in the short term.

CUMULATIVE IMPACTS

The No Action Alternative would have no direct adverse or beneficial effects on wildlife or aquatic life. If the unreinforced pier collapsed due to an earthquake, there would be a moderate to major, short-term adverse cumulative effect to wildlife and aquatic life resulting from other in-Bay structure failures, to which this alternative would contribute. The No Action Alternative would not contribute to cumulative effects on special-status species. Increased turbidity in the event of a pier collapse would be localized and would not likely affect special-status species in the cumulative context.

PREFERRED ALTERNATIVE

Construction, made more likely by the implementation of the Preferred Alternative, would have a minor, short-term adverse effect on fish and wildlife in open waters, and would contribute to a negligible adverse cumulative effect on benthic and open water species. Mitigation for the protection of spawning Pacific herring would ensure that there is no adverse effect on this commercially important species. Consultation with the National Marine Fisheries Service would be required prior to retrofit of Piers One and Three. The analysis indicates that the Preferred Alternative is not likely to adversely affect special status species.

BENTHIC HABITAT

Potential removal of timber fender piles for seismic retrofit of Piers One and Three would temporarily disrupt the existing community of organisms found in this subtidal habitat. The



disruption of the sessile community would be offset by the replacement of new fender piles that would create new pile habitat. Sessile organisms such as tunicates, mussels, and sponges would rapidly colonize the new fender piles (URS 2002), resulting in a net minor, short-term adverse effect to the communities inhabiting fender piles that are replaced.

Should the project involve seismic retrofit of Piers One and Three, including removal of fender piles, attached fish eggs would be adversely affected. Of particular concern are herring eggs that are spawned from November to March. If construction occurs during this time, direct impacts to both spawning herring and herring eggs could occur. Construction in the months of April through October would not impact herring eggs.

Depending on project design of the seismic retrofit of Piers One and Three, potential removal of the creosote-treated piles and replacement with non creosote-treated piles (e.g., plastic piles) would remove a potential source of toxins, thereby benefiting new colonizers of this habitat, especially Pacific herring that may attach their eggs to these piles. The survival rate of herring eggs on creosote piles is very low (URS 2002). Removal of these treated piles and replacement with nontoxic materials would likely have a beneficial effect for future herring spawning at Piers One and Three.

OPEN-WATER HABITAT

Potential insertion of piles with pile drivers could disturb fish and birds due to elevated noise levels and physical activity. The physical disturbance caused in the area could result in short-term avoidance by fish and wildlife in the immediate vicinity and is considered a negligible, short-term effect. Fish and wildlife would return to the project area once construction is complete. During construction, potential pile driving and removal of timber fender piles could cause sediments to become temporarily suspended in the immediate vicinity. Increased turbidity and suspended sediments may temporarily drive fish and invertebrates from the immediate area. The impact to benthic organisms and foraging fish and birds would be negligible. No open-water dredging would be conducted for the Fort Mason Center Long-Term Lease.

Potential under-pier repair of concrete caissons would require divers to use high-pressure water jets to remove marine growth and install protective fiberglass jackets. Fiberglass is considered nontoxic to aquatic ecosystems. Marine growth would not be re-covered and may attract fish and birds into the area. The marine growth occurs naturally in the Bay and would not impact the area. Fish and birds in the project area may move into the project vicinity to feed but are expected to avoid the area once other, more disruptive construction activities begin. Based on a number of studies cited in the Pier 2 EA, once construction is completed, recolonization of the piles is expected to occur.

SPECIAL-STATUS SPECIES

Birds

Double-crested cormorant and California brown pelican both forage in the San Francisco Bay



and may be present in the general project area. Potential adverse effects to these species would be limited to construction-period activities that could disturb opportunistic roosting or perching at Piers One and Three. These birds are known to roost and perch in a wide variety of habitats around the Bay and Delta and would likely avoid waters near the site during construction associated with the potential retrofit of Piers One and Three under the Fort Mason Center Long-Term Lease. Nesting habitat for these birds is not present in the project area. The Preferred Alternative would therefore have a negligible, short-term adverse effect on the double-crested cormorant and would not likely adversely affect the California brown pelican.

California black rail nesting and foraging habitat is not present in the project area. This species occurs in the tidal marshlands of the northern reaches of the San Francisco Estuary. The Preferred Alternative would have no effect on the California black rail or bank swallow.

Fish

The National Marine Fisheries Service (NMFS) classifies and lists salmon by Evolutionary Significant Units (ESU). ESUs must be substantially reproductively isolated from other populations and contribute substantially to the ecological or genetic diversity of the species. Three Chinook salmon ESUs migrate through the Bay: Sacramento River winter-run (federal-and State-listed endangered species), Central Valley spring-run (federal- and State-listed threatened species), and Central Valley fall/late fall run (proposed federal-listed endangered species and state species of concern). These

species migrate from the Golden Gate northward to the Sacramento and San Joaquin Rivers. California's largest populations of Chinook salmon originate in the Sacramento-San Joaquin River system. Distribution of outmigrating juvenile Chinook salmon is not well known in San Francisco Bay, although they have been found throughout the Bay, including the South Bay (BCDC 2001).

The downstream migration route is assumed to be southward through Suisun Bay, San Pablo Bay, into Central Bay, and out through the Golden Gate. Steelhead trout, a federal-listed threatened species, have generally the same migration route as Chinook, returning primarily to the Sacramento River. The nearshore habitat in the vicinity of Piers One and Three is primarily rock and concrete riprap, and piers on pilings. Adult and juvenile Chinook and steelhead may use shallow open water and intertidal habitats around the project site when migrating to spawning grounds or the Pacific Ocean. Most Chinook and steelhead are migrating from the North Bay and would be primarily moving along the northern margin of the San Francisco Bay.

Potential adverse effects from pile-driving activities may result in temporary disturbance to migrating Chinook salmon and steelhead. The Central Bay provides a large migratory corridor, and should they be present near the site during pile-driving, Chinook salmon and steelhead trout would be expected to avoid the area by moving farther offshore.

Due to the response characteristics of potentially affected fish species and depending on the



timing of the pile driving, the Preferred Alternative is not likely to adversely affect winterrun Chinook salmon, spring-run Chinook salmon, fall/late-fall-run Chinook salmon, or the Central California steelhead. Prior to seismic retrofit of Piers One and/or Three, the FMF and NPS would be required to initiate an informal Section 7 consultation with the NMFS, as was undertaken for the Pier Two seismic retrofit. Construction activities beyond retrofit of Piers One and Three (e.g., retrofit of landside buildings) would not impact marine life. Although construction activities have the potential to impact water quality, these impacts would be reduced to negligible through the implementation of mitigation measures discussed in Section 4.7, Water Quality.

Marine Mammals

Potential impacts from pile driving activities may result in temporary disturbance to foraging or migrating mammals. Under the federal Marine Mammal Protection Act of 1972 (amended in 1994), it is strictly forbidden to intentionally harass marine mammals. Harassment is defined as "any act of pursuit, torment, or annoyance which has the potential to injure a marine mammal or marine mammal stock in the wild (Level A harassment) or has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption to behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering (Level B harassment). Pile driving is considered Level B harassment.

With respect to underwater noise, according to the Pier 2 EA, NMFS' guidelines suggest that received underwater sound pressure levels at or above 160 decibels (dB) referenced to 1 micropascal² (160 dB re 1 μPa) as constituting harassment of marine mammals. NMFS has suggested that sound pressures above 180 dB re 1 μPa could cause temporary hearing impairment in marine mammals.

The underwater sound level from (pile driving at a distance of 0.6 mile was estimated to be 138 dB and the measured sound level in the air was estimated to be 105 dBA at a distance of 50 feet. Based on these levels, the in-air sound level at Pier 39, which is the nearest haul-out location, would be about 64 dBA. Due to intervening buildings and topography between Pier Two and Pier 39, the underwater sound level at Pier 39 was calculated to be 133 dB, which is well below the NMFS standard of 160 dB. For the Pier Two Seismic Retrofit project, calculations were performed to determine the distance from Pier Two in which a marine mammal would encounter sound levels of 160 dB (level constituting harassment). That distance was determined to be approximately 250 feet from the location of the pile driving (URS 2002). Given the proximity of Piers One and Three to Pier Two, impacts would be very similar during seismic retrofit of Piers One and Three.

Several studies have been conducted to determine the behavioral reactions of certain species of marine mammals to aversive sounds. Reactions usually involve cessation of feeding, resting, or social interaction, and onset of

² The term "referenced to one micropascal" refers to a reference pressure used to measure the intensity of the sound wave.

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alertness or avoidance. In particular, avoidance reactions observed in pinnipeds (seals and sea lions) commonly involved movement from haulout sites to water (or vice versa). However, pinnipeds also exhibit much tolerance of some human activity. Moreover, the marine mammal species that inhabit the San Francisco Bay are likely habituated to loud noises due to the existing high levels of ship traffic and industrial noise in San Francisco Bay. Additionally, results of a study of 39 radio-tagged harbor seals in San Francisco Bay found that most active diving occurred at night. Therefore, pile driving activities associated with the Preferred Alternative, which would take place during daylight hours, would not likely disturb most harbor seal feeding activity (URS 2002).

Pile driving activity in conjunction with the seismic retrofit of Piers One and Three, made more likely by the Preferred Alternative, would be short-term in duration and would have a minor, short-term adverse effect on marine mammals that come within 250 feet from the location of the pile driving. Marine mammals are expected to avoid coming within proximity of the pile driving activity and do not haul out in the vicinity of the Fort Mason piers. Therefore, the Preferred Alternative would not likely adversely affect the federally protected California sea lions, the federally protected Pacific harbor seals, or the federally threatened southern sea otter.

Other Species

Although listed in the CNDDB as occurring in the San Francisco North quadrangle, sufficient habitat for the either the red-legged frog, bay checkerspot butterfly, or the blue mission butterfly is not present at the FMC. As these species are not anticipated to occur at the project site, the Preferred Alternative would have no effect on these species. The monarch butterfly, which has been observed at Fort Mason in the past, has not been observed in recent years. The monarch was observed at the upper part of Fort Mason, rather than the FMC, and the project is not likely to affect this species.

CUMULATIVE IMPACTS

Section 4.7, Water Quality, describes several projects that may affect water quality in the vicinity of FMC during the long-term lease. As described in that section, to the extent that the Preferred Alternative would contribute to a cumulative impact on benthic habitat, it would be a localized effect occurring in the immediate vicinity of the Fort Mason piers. This would also be true for effects to open-water habitat, where fish and wildlife would avoid the area of physical disturbance, regardless of the source of the disturbance (e.g., noise or increased turbidity). Bay dredging and mining activities are occurring at least 1.5 miles from the Fort Mason piers and are therefore not considered relevant in the cumulative context for benthos or the open-water habitat. However, should construction of the San Francisco City Yacht Harbor breakwater occur at the same time as seismic retrofit of Pier One or Pier Three, construction effects could contribute to a cumulative effect on Marine Life near FMC. Therefore, the Preferred Alternative would contribute to a minor, short-term adverse cumulative effect on the benthic environment and open water and wildlife species.



MITIGATION MEASURES

Potential renovation of Piers One and Three could impact marine resources, including species of special concern that could inhabit areas adjacent to the project site. As with the Pier Two seismic retrofit, prior to retrofit of Pier One and/or Pier Three, NPS would be required to initiate an informal Section 7 consultation with NMFS regarding those projects' potential effect on listed anadromous salmonids and designated critical habitat. In addition, NPS would contact the CDFG as a courtesy and to discuss potential impacts to the Pacific herring. Marine resource mitigation measures included in the Pier 2 at Fort Mason Seismic Retrofit and Structural Repair Project Environmental Assessment, or equivalent measures developed in consultation with NMFS, CDFG, and potentially the USFWS shall be implemented should the renovation of Piers One and/or Three take place during the term of the long-term lease. If the National Park Service (NPS) determines that the renovation of Piers One or Three would be undertaken in a substantially different manner from the Pier Two renovation, additional mitigation measures and/or NEPA documentation may be warranted.

Mitigation measures that apply to marine and estuarine resources include the following:

1. Monitoring to Avoid Herring Spawning. Also consistent with Pier Two rehabilitation, during the spawning season for pacific herring (mid-November through March), a biologist with a background in

- fisheries shall regularly monitor the site for presence of herring. If herring spawning is occurring in the project area, the aquatic biologist shall contact the NPS, and a range of mitigation measures may be taken to avoid impacting the spawning, including stopping work for up to two weeks, continuing work in other areas, or screening the work area to prevent spawning.
- 2. Restrictions on Pile Driving. If pile driving is necessary for construction in the water or pier restoration work, the contractor shall be required to conduct steel pile driving, if any, between June 15 and October 15 in order to avoid impacts to the migration of federally listed salmon and steelhead.

In addition, the NPS would adhere to applicable conditions for pier restoration work as required by permitting agencies. The following permit conditions are from the Pier 2 EA and Finding of No Significant Impact (FONSI) and are included here to provide guidance on the future retrofit of Piers One and Three:

The U.S. Army Corps of Engineers' Nationwide Permit Program, specifically Nationwide Permit No. 3 (Maintenance) under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act

The California Regional Water Quality Control Board, San Francisco Bay Region, related to their Conditional Water Quality Certification and Waiver of Waste Discharge Requirements (Section 401 of the Clean Water Act) for the Pier Two Seismic Retrofit project

The National Marine Fisheries Service set forth as part of their informal Section 7 (Endangered Species Act) consultation process

Finally, the same measures identified earlier in Section 4.7, Water Quality, to reduce potential impacts to the Bay waters are applicable to protecting marine life.

■ Impairment of Park Resources

The No Action Alternative would have no direct effect and would not contribute to a cumulative effect on wildlife and aquatic life, including special-status species. There would be no impairment to park resources or values related to wildlife, aquatic life, or special-status species. Should the Preferred Alternative involve seismic retrofit of Piers One and Three, than during construction, the Preferred Alternative would have a negligible adverse effect on fish and wildlife in open waters, and would contribute to a negligible adverse cumulative effect on benthic and open water species. These effects would not impair park resources or values.

4.9 Topics Dismissed from Further Review

Preliminary environmental analysis and public scooping of the proposed project showed that

the proposed action would have insignificant consequences for the environmental topics discussed in this chapter. Exclusion of in depth discussion of these topics allows for the EA to be narrow in scope and focus on a comprehensive and thorough analysis of topics involving potentially substantial changes to the affected environment. NEPA regulations encourage this approach to "focus on the issues which are ripe for decision and exclude form consideration issues already decided or not yet ripe" (Section 1508.28).

■ Geological Resources

Under the proposed long-term lease no ground disturbances that could affect the elevation, topography, or other geotechnical characteristics are anticipated. The potential seismic upgrades of Piers One and Three would be subject to geotechnical surveys and engineering specifications that comply with the Uniform Building Code. Furthermore, any discharge materials that could occur due to potential construction/demolition activities of the buildings, surface parking areas, or utilities would be subject to a National Pollution Discharge Elimination System permit, which requires the preparation of a Stormwater Pollution Prevention Plan. Thus, sediments and other pollutants will not be transported into surface water and diminish water quality. Given the above procedures, no adverse impacts would occur for the geologic resources.



■ Geohazards

Although the project site is not located in an Alquist-Priolo Earthquake Hazard zone, it is situated within a seismically active area bounded by two active faults, San Andreas and Hayward. Consequently, new development or restoration of buildings on the FMC could be subject to substantial seismically induced groundshaking, liquefaction, or ground failure. The proposed long-term lease would more readily enable FMF to pursue seismic upgrades to historic structures at the FMC, including Piers One and Three. Seismic strengthening would be subject to Chapter 16 of the International Building Code 2000 edition and structural peer review. The seismic retrofits and restoration projects would ensure that buildings and piers retain their structural integrity during an earthquake. Given the beneficial effects of seismic upgrades under the proposed action, FMC structures would not be subject to unacceptable levels of geohazardous risk.

■ Air Quality

The Bay Area Air Quality Management District (BAAQMD) is responsible for air quality planning and ensuring that state and federal ambient air quality standards are met. Unlike manufacturing or industrial operations, emissions associated with recreational and cultural resources like FMC are directly related to the vehicular trips made by employees and visitors. The traffic volumes and levels of congestion created at local intersections result in automobile-related exhausts. Potential

exceedances of the state and federal ambient air quality standards are most likely during the peak commute hours, because those are periods when traffic conditions are known to be most congested. Because activities held at the FMC generally do not coincide with peak traffic periods, exceedance of state and federal ambient air quality standards are not anticipated. Additionally, traffic analysis indicates that the existing Level of Service (LOS) is not expected to change on major intersections surrounding the FMC with the implementation of the proposed action.³

Air quality conditions in the FMC vicinity can also be affected by short-term construction period emissions from three different sources: ground disturbances that can generate dust, construction vehicles, and construction equipment. Since the FMC site is fully paved, there is little potential for dust generation during construction. Construction activities that can generate dust emissions would be subject to applicable dust control measures recommended by BAAQMD. Implementation of such measures would reduce air pollution emissions from construction activities to less-thansignificant levels. Emissions from construction vehicles and equipment are accounted for in the regional emission inventory because the construction industry is already an existing source of emissions. Therefore, the BAAMD does not consider construction exhaust emissions from individual construction projects throughout the Bay Area to threaten attainment of state and federal air quality standards.

³ Level of Service is a qualitative description of an intersection's performance based on average delay per vehicle.

■ Noise

Generally speaking, FMC is a bustling area with most noise generated by outside vehicular circulations as well as foghorns, boat horns, and wave wash. The FMF schedules its events such that concurrent activities do not cause unreasonably large crowds or excessive traffic. Under the proposed long-term lease, FMF would continue to operate such that large crowds and excessive traffic is avoided.

Additional noise under the proposed long-term lease is likely to result from three kinds of activities: increased traffic on the surrounding streets, increased activity at the FMC, and construction. As mentioned in the Air Quality section of this chapter, traffic analysis indicates that average delay per vehicle is not expected to change on major intersections surrounding FMC, suggesting that there will be no significant increase in traffic. Increased activity at the FMC is a concern only if outdoor amplified sound systems are used, but these events would be regulated by FMF and hour limitations would be imposed. Future construction activities can cause average noise levels of 75 to 90 dBA at 50 feet from the activity. Noise levels diminish as the distance increases from the source, at approximately 6 dBA for every doubling of distance. Thus, if construction equipment and activity were at the perimeter of FMC, noise levels 100 feet away would be 69 to 84 dBA and at 200 feet noise levels would be 63 to 79 dBA. The nearest homes in the Marina neighborhood are over 700 feet away and the hilly topography on the eastern and southern side of the site blocks noise transmission to the residential areas

to the south of the project site. Consequently, the receptors would not be expected to experience significant construction noise from typical equipment. Potential short periods of loud noise generated during seismic retrofit by such activities as pile driving, would be subject to noise-specific mitigations in order to ensure that significant impacts would not occur.

■ Water Quantity

Potential renovations of Pier One could increase the number of resident organizations occupying the FMC and the number of visitors to the FMC. These employees and visitors would use an additional quantity of water above and beyond current use. Based on representative models of future uses at Pier One that reflect generally the current mix of resident and visitor space, the number of onsite employees would increase nominally and the number of visitors could be expected to increase in the range of 7 to 10 percent over current annual visitation levels of 1.6 million visitors. Although the new lease may indirectly increase the number of visitors to Fort Mason, the project would not place increased burden on the City's water resources. Should net visitors increase to the City as a result of the new lease, the increase would be negligible when compared to the population of the City (793,600 as of January 1, 2002) and number of total visitors (15.7 million in 2001). Therefore, any potential increase in consumption of water would be less-than-significant.

■ Streamflow Characteristics

The FMC is the site of a former military base and is paved completely with asphalt. There are



no streams on the site, and runoff from the site would not enter or influence any stream systems. Under the proposed action, building footprints would not change nor would the amount of pervious and impervious surfaces change. Therefore, site runoff would not change due to the proposed action.

■ Floodplains or Wetlands

The site does not contain any wetland areas; therefore, no impacts to wetlands would occur from implementation of the proposed action.

Land Use—Including Occupancy, Income, Values, Ownership, and Type of Use

The proposed project would not change current land use patterns. Likewise, it is not a growth-inducing project because it does not include the elements of a growth-inducing project, such as extension of urban services or infrastructure into a previously unserved area or the removal of any major obstacles to development and growth. As the FMC does not include any homes, the proposed project would not directly or indirectly increase or diminish population or housing. Potential impacts associated with activity level increases indirectly resulting from the new lease are evaluated in other impact topics such as transportation and visitor experience.

Rare or Unusual Vegetation (such as old growth timber, riparian, and alpine)

As a National Historic Landmark District, Fort Mason is obligated to retain the original aesthetic qualities of its original use as a military base and Port of Embarkation. These aesthetic restrictions extend to the grounds. The surface of the FMC is paved with asphalt and there is no landscaping or areas of native habitat. Consequently, there is no rare or unusual vegetation present on the project site to be affected by the proposed project.

Unique Ecosystems, Biosphere Reserves and World Heritage Sites

As previously described, the FMC is paved with asphalt, with no landscaping or areas of native or natural habitat. The FMC is located in a highly urbanized area, with no unique ecosystems or World Heritage Sites. Therefore, the proposed action would not affect unique ecosystems or World Heritage Sites.

Unique or Important Wildlife or Wildlife Habitat

As previously described, the FMC is paved with asphalt, with no landscaping or areas of native or natural habitat. As a result, the FMC, located in a highly urbanized area, contains no unique or important wildlife habitat areas supporting

unique or important wildlife. Therefore, the proposed action would not affect unique or important wildlife or wildlife habitat.

Introduction or Promotion of Nonnative Plant and Animal Species

The proposed action is a new long-term lease and would not directly introduce or promote nonnative species. None of the activities that might occur under the lease, such as the development of the Pier One shed, the seismic retrofit of other buildings at FMC, utility upgrades, and possibly paid parking, would introduce or promote nonnative species.

Recreational Resources— Including Supply, Demand, Visitation and Activities

Although visitation and demand are expected to increase with implementation of the proposed action, impacts from increased visitors will be addressed in other topics such as traffic and parking. The possible restoration and reuse of Pier One, which is more feasible under the proposed long-term lease, would have a beneficial effect on the supply and availability of recreational resources and on opportunities for the public to enjoy the waterfront.

Aesthetic Resources

No physical changes are expected that would alter the height, bulk, scale, or orientation of the facilities at FMC or the appearance and ambience of the site. Such changes would be in conflict with requirements to preserve the historic status of the site. Consequently, aesthetic resources would not be affected by the proposed action and the resultant improvements that are likely as a result of the lease.

Socioeconomics—Including Employment, Occupation, Income Changes, Tax Base, and Infrastructure

Fifty full-time employees support FMC operations and oversee events at the FMC venues and facilities. Approximately 200 full-time employees work at the organizations and businesses located at FMC. This number represents a fraction—less than one percent—of the 385,800 workers in San Francisco in April 2003.

Potential renovation of Pier One may increase the amount of space available for resident organizations in tenure at FMC, thereby increasing the number of residents with employees working at the FMC. However, increases in employment at the FMC would not necessarily create new jobs within the San Francisco Bay Area; it is possible that employees of resident organizations new to Fort Mason would be relocated from another location within the City. Net employment increases would be negligible when compared to the number of people that currently work at the FMC and the number of people that work in the Bay Area. Therefore, changes to tax base and income would be negligible.



Minority and Low-Income Populations

The FMC is located within the lower portion of Fort Mason, a former military facility. The FMC does not house residences; it is made up of nonprofit organizations and private businesses only. It is bordered by marina uses on the west, transportation and parking facilities to the southwest, and upper Fort Mason park facilities to the south and southeast. According to the Pier 2 at Fort Mason Seismic Retrofit and Structural Repair Project Environmental Assessment (Pier 2 EA), the closest residences are live-aboard boats at the adjacent marina. The neighborhoods that surround the FMC cannot be characterized as predominantly minority or low-income. Since there are no environmental justice communities in the project area, they will not be affected by the project.

■ Energy Resources

Although the new lease may indirectly increase the number of visitors to Fort Mason, the project would not place increased burden on the City's energy resources. Should Pier One undergo seismic retrofit and begin to house events and activities, increased visitor numbers would total approximately 7-10 percent of the FMC's current 1.6 million annual visitors. Should net visitors increase to the City as a result of the new lease, the increase would be negligible when compared to the population of the City (793,600 as of January 1, 2002) and total visitors (15.7 million in 2001) (San Francisco Convention and Visitors Bureau 2002).

Construction activities associated with implementation of the long-term lease would be undertaken in an energy efficient manner, and renovations would increase energy efficiency due to installation of energy efficient fixtures.

Resource Conservation Potential

The proposed action would increase conservation of historic resources by providing funding for maintenance and upgrading of historic structures on the site. The proposed action would increase potential for energy conservation due to improved maintenance and installation of more energy efficient fixtures. The FMC currently implements a recycling program, which would not change under the proposed action.

Long-Term Management of Resources and or Land/ Resource Productivity

As the FMC does not produce resources per se, land and resource productivity would not be affected by the proposed action. The proposed action is intended to have a beneficial impact on the long-term management of historic resources at the FMC. Over the course of the long-term lease, the proposed action would continue to ensure that the historic integrity of the structures at lower Fort Mason be protected and that future upgrades conform to Section 106 of the National Historic Preservation Act and to the Secretary of Interior's Standards of Rehabilitation.

Chapter 5

CONSULTATION AND COORDINATION /PUBLIC INVOLVEMENT

As described in Chapter 1, Introduction, the Fort Mason Foundation (FMF), in partnership with the National Park Service (NPS), sought to obtain input from the public, other agencies, and environmental organizations. On March 1, 2003, the NPS sent a scoping notice announcing its intention to prepare an Environmental Assessment (EA) for the Fort Mason Center Long-Term Lease and to hold a public scoping meeting to determine the scope of impact topics and alternatives to be addressed in the EA. The public meeting, held on March 18, 2003, introduced the proposal and invited comments on a number of topics proposed for possible change and study in the planning and environmental review process. Interested parties were encouraged to provide comment on the project through April 16, 2003. Two members of the public spoke at the scoping meeting, and two written comments, both from resident organizations of the FMF, were received. Without specifically mentioning the lease, one letter opposed implementation of paid parking at the FMC for both visitors and staff, and a second letter fully supported the Fort Mason Center Long-Term Lease.

NPS Staff conducted internal scoping to identify and evaluate potential impacts from the Preferred Alternative. The project was presented to the GGNRA Project Review Committee on three occasions to solicit comments and identify impacts.

In addition, on May 1, 2003, the FMF and NPS sent out eight agency consultation letters to solicit comments regarding the proposed action. The agencies were then contacted via telephone to ensure that the letters had been received and to answer questions agency staff may have had. Agencies were requested to provide written comment by May 24, 2003, and these comments have been incorporated into the EA. Comment letters were received from the California Department of Fish and Game (CDFG), U.S. Fish and Wildlife Service (FWS), and San Francisco Bay Conservation and Development Commission (BCDC). The comments received focused on three topics: (1) consistency of the project with the San Francisco Bay Plan, McAteer-Petris Act, and other applicable regulations; (2) effects of the project, namely, potential seismic retrofit of Piers One and Three, on San Francisco Bay water quality; and (3) effects of the project, namely seismic retrofit of Piers One and Three, on area marine life.

Agencies that were contacted by standard mail and via telephone are as follows:

San Francisco Bay Conservation and Development Commission

On June 9, 2003, Andrea Gault of the San Francisco Bay Conservation and Development Commission (BCDC) submitted a scoping



comment letter to NPS requesting that the EA analyze of consistency of the Preferred Alternative with the San Francisco Bay Plan, the McAteer-Petris Act, and Regulation Section 10704. The letter also identified the "types of environmental and policy issues staff believes could be raised as a result of this project" and stated BCDC's believes that submittal of a consistency determination for the Preferred Alternative would be necessary even though it acknowledges that all federally owned lands are exempt.

California Department of Fish and Game

On May 23, 2003, Eric Larsen of the California Department of Fish and Game (CDFG) sent a letter to NPS requesting that the EA identify and evaluate all activities in the construction and operational phases of the project that may impact fish and wildlife populations or their habitats, energy supplies, and reproductive requirements. The letter also requested an assessment of flora and fauna within or adjacent to the project site, especially special status species, and an analysis of potential impacts to these species from pier seismic retrofit, including impacts from noise, habitat loss, and pollution from construction. The letter also requested that the EA discuss whether the rehabilitation of historic structures at Fort Mason, a set of activities that could occur under the Preferred Alternative, may include the use of materials that are deleterious to aquatic and terrestrial species. Finally, CDFG requested information on potential effects to the Pacific herring.

California Department of Boating and Waterways

On May 20, 2003, Suzie Betzler from California Department of Boating and Waterways (CBDW) indicated during a telephone conversation that CBDW did not have any comments on the project at that time, but that she would review the EA. She indicated that CBDW would likely have comments when and if FMF or NPS installs a ferry dock at the FMC.

California CoastalCommission

The California Coastal Commission has not provided comment to date.

San Francisco Regional Water Quality Control Board

The San Francisco Regional Water Quality Control Board has not provided comment to date.

■ U.S. Fish and Wildlife Service

On May 16, 2003, USFWS sent a scoping comment letter to NPS that provided species lists of potentially occurring flora and fauna in the project vicinity and stated that a trained biologist should evaluate whether the project site contains habitat suitable for any of these special status species and whether the proposed project would affect any such species. The USFWS letter also explained circumstances under which federal permits or Endangered Species Act consultations would be required.

National Marine FisheriesService

To date, the National Marine Fisheries Service has not commented on the Preferred Alternative. However, at such time that the long-term lease involve seismic retrofit of Piers One and/or Three, FMF and NPS would request an informal Section 7 consultation under the Endangered Species Act to address impacts from the preferred alternative to fish and marine mammal species that may occur in the vicinity of the FMC.

■ U.S. Army Corps of Engineers

In a telephone conversation on June 2, 2003, Ed Wylie, South Section Chief of the U.S. Army Corps of Engineers San Francisco District's Regulatory Branch indicated that seismic retrofit of Piers One and/or Three would require a permit under Section 404 of the Clean Water Act. Mr. Wylie had no other comments at that time.

California State Historic Preservation Office

On April 8, 2003, NPS sent a letter to the State Historic Preservation Officer at the Office of Historic Preservation indicating that NPS wished to open a consultation with the Advisory Council on Historic Preservation for the FMCLTL. This letter also indicated NPS's desire to negotiate a Section 106 Programmatic Agreement that would streamline compliance for repetitive or low impact level preservation maintenance activities as well as allow for a streamlined review of any major rehabilitation project that may occur.

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

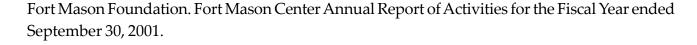


Chapter 6

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Chapter 7

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FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT

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415 561-4841 phone 415 561-4854 fax

Public Scoping Notice Environmental Assessment

Fort Mason Center Continuing Program and Long-Term Lease

The National Park Service (NPS) is soliciting public comment on the scope of an Environmental Assessment (EA) and Section 106 Consultation that will evaluate the potential impacts of a long-term lease between NPS and the Fort Mason Foundation (FMF) for the continuing operation of Fort Mason Center. A long-term lease of up to 60-years is proposed, with additional responsibilities for management of the Fort Mason Center to be assumed by the Fort Mason Foundation. Public comments on the scope of the EA, including issues and alternatives that should be considered, are welcome until April 16, 2003.

The project will be presented at the Golden Gate National Recreation Area's public meeting on March 18, 2003. The meeting will be held at Building 201 Fort Mason in San Francisco and will begin at 7:00 p.m.; however, please note that several projects will be presented at the meeting and the exact time is not established. Directions to the meeting can be obtained by calling (415) 561-4700 or by going to the park website at http://www.nps.gov/goga/maps/pdf/fomamap.pdf. Additional information about the project is available by contacting Jonathan Gervais at (415) 561-4841.

Interested individuals, organizations and agencies should send written comments to:

Superintendent Golden Gate National Recreation Area Attn: Fort Mason Center Scoping (Gervais) Building 201 Fort Mason San Francisco, CA 94123

Fax comments to (415) 561-4854. E-mail comments will not be accepted.

BACKGROUND

Located on the San Francisco waterfront between Fisherman's Wharf and the Golden Gate Bridge, Fort Mason is a historically significant assemblage of piers and waterfront facilities used by the Army to ship personnel and supplies throughout the Pacific. The Army relinquished Fort Mason in 1963, it was incorporated into the Golden Gate National Recreation Area (GGNRA) in

1972, and Fort Mason was designated as a National Historic Landmark in 1985. The Fort Mason Foundation, formed in 1976, operates the facilities at the Fort Mason Center pursuant to a cooperative agreement with the NPS.

The FMF has operated Fort Mason for the benefit of the people of the San Francisco Bay Area and beyond for the past 25 years. The mission of the FMF is to, "create and preserve a cultural, educational and recreational center which reflects the unique history, talents and interests of the people of the Bay Area, in partnership with the National Park Service." The Fort Mason Center has become a national model for the conversion of military facilities to peacetime use. Forty resident nonprofit organizations provide a broad range of activities for all interests, from the performing and visual arts to environmental concerns and wilderness adventures. Four museums present exhibitions, lectures, classes, and family workshops and five theaters present national and international productions offering a variety of dramatic, comedic, dance, and musical performances. The operation of the Fort Mason Center has been consistent with the GGNRA's 1980 General Management Plan.

PROPOSED PROJECT

The GGNRA is proposing to enter into an up to 60-year lease agreement for the continuing use of Fort Mason by the Fort Mason Foundation. The proposed lease is structured to assure the preservation of the landmark and the continuation and expansion of programs that are consistent with the GGNRA's General Management Plan. The lease will include changes to the operation of the Fort Mason Center. In particular, the parking lot will be controlled by the Fort Mason Foundation who may, during the lease term, incorporate a parking fee. If, during the lease term, the NPS obtains appropriations it will seismically retrofit and structurally rehabilitate the substructures of Piers 1 and 3. Pier 1, which was assigned to FMF through an amendment to the Cooperative Agreement in 2002, will be included in the lease. If NPS obtains funding and rehabilitates the sub-structure, FMF will renovate the Pier 1 Shed and put it into programmatic use during the lease term. FMF will perform projects as required to maintain, restore and preserve the buildings during the lease term.

Environmental/Historic Preservation Review

The environmental assessment will be prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), the 2001 National Park Service (NPS) Management Policies, and the NPS Director's Order No. 12: Conservation Planning, Environmental Impact Analysis, and Decision-Making. Section 106 Consultation under the National Historic Preservation Act (amended) will be conducted concurrently with the assessment process meeting the requirements of the Advisory Council On Historic Preservation's Section 106 Regulations (36 CFR Part 800). This assessment will evaluate the potential environmental effects of the project on the environment, including effects on cultural resources, visitor use and experience, natural resources, and socioeconomic effects. Mitigation measures will be identified to avoid or reduce any adverse environmental effects from this project. The release of a draft EA for public review is scheduled for early summer 2003.

Questions to consider when preparing scoping comments:

- What issues (environmental, socioeconomic, etc.) should be considered in the environmental assessment?
- Would this project affect how you use the Fort Mason Center?
- Are there other alternatives you would like to see considered?



(831) 649-2870



May 23, 2003

Mr. Jonathan Gervais
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, California 94123

Dear Mr. Gervais:

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The Department of Fish and Game (Department) is responding to your request for comments on the scope of the Environmental Assessment (EA) that will evaluate the potential impacts of a long-term lease between the National Park Service (NPS) and the Fort Mason Foundation (FMF) for the continuing operation of the Fort Mason Center. A long-term lease, of up to 60 years, is proposed with additional responsibilities for the management of the Fort Mason Center to be assumed by the Fort Mason Foundation. The lease also will allow for the preservation and maintenance of the San Francisco Port of Embarkation National Historic Landmark District. With the proposed lease, the FMF will be able to raise monies to restore, preserve, and maintain the various buildings and structures to ensure that the Landmark District retains its integrity. However, the NPS will retain responsibility for the pier substructures and the seawall, while the FMF will be responsible for the rehabilitation and renovation of Pier One.

The Department is a trustee agency in terms of the California Environmental Quality Act. Our primary objective for reviewing environmental documents is to be able to provide the project sponsor with recommendations for avoiding or minimizing negative impacts to fish and wildlife, and California's environmental resources, their use and users. In attempting to meet this objective, our attention is usually focused upon potential habitat damage or loss, acute or chronic effects to fish and wildlife from changes in habitat quality, and any possible resource use conflicts.

In our review of the EA, we will need to be able to identify and evaluate all activities in both the construction and operational phases of the project which may impact fish and wildlife populations or their habitats, energy supplies, and reproductive requirements. We also will need to be aware of how and where the project would modify opportunities for the public use and enjoyment of the living resources of the State.

Mr. Jonathan Gervais May 23, 2003 Page Two

A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats should be identified and described. Surveys for potential use of affected construction areas by special status species, should be included in the EA. The presence of any vegetated intertidal or subtidal areas at the project site also is of particular concern to the Department. Any potential impacts which relate to these resource values should be thoroughly described, and discussed in conjunction with compensation for unavoidable, project-induced losses. Compensation for direct impacts to fish and wildlife habitat should be proposed in the form of habitat replacement, restoration, and improvement.

The Federal guidelines under the Secretary of the Interior standards, for preservation, restoration, or rehabilitation of historic properties may include the use of materials that are deleterious to aquatic and terrestrial species. The EA should describe all potential material(s) that could be used in the restoration of the buildings and Pier One and the potential effects from usage to impacted species and their habitats. Effects to species, due to construction impacts and expansion of programs, that need to be evaluated may include: noise disturbance, habitat loss due to lay down areas, habitat loss due to expansion of building footprints or parking areas, contact with pollution from construction activities (litter, petroleum products, cleaning agents, etc.), expansion of programs at Pier One, and increased public access to the waterfront. In addition, a section on potential effects to herring is recommended due to their historic and continuing use of the San Francisco waterfront as a spawning area.

Thank you for the opportunity to express our comments and concerns regarding the scope of the EA and look forward to reviewing it. As always, Department personnel are available to discuss our comments, concerns, and recommendations in greater detail. To arrange for a discussion please contact Deborah Johnston, 20 Lower Ragsdale Drive, Suite 100, Monterey. CA 93940 or telephone (831) 649-7141.

Sincerely

ERIC J. LARSON

Northern California Marine Manager/ Bays and Estuaries Ecosystem

Coordinator

Marine Region-Belmont

cc: Ms. Mai-Liis Bartling, Acting Superintendent Ms. Terry Palmisano, CCR Monterey

Ms. Deborah Johnston, MR Monterey



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office 2800 Cottage Way, Room W-2605 Sacramento, California 95825

MAY 16 2003

Memorandum

To:

Superintendent, Golden Gate National Recreation Area, San Francisco, California

(Attn.: Gervais)

From:

Chief, Endangered Species Division, Sacramento Fish and Wildlife Office, Fish and Wildlife Service, Sacramento, California

Subject:

Species List for Environmental Assessment for the Long-Term Lease of Fort Mason Center from National Park Service to the Fort Mason Foundation, San

Francisco County, California

We are sending the enclosed list in response to your April 30, 2003, request for information about endangered and threatened species (Enclosure A). This list fulfills the requirement of the Fish and Wildlife Service (Service) to provide species lists under section 7(c) of the Endangered Species Act of 1973, as amended (Act).

The animal species on the Enclosure A quad list are those species we believe may occur within, or be affected by projects within, the following USGS quads, where your project is planned: Point Bonita Quad.

Any plants on the quad list are ones that have actually been observed in the project quad(s).

Plants may occur in a quad without having been observed there. Therefore we have included a species list for the whole county in which your project occurs. We recommend that you survey for any relevant plants shown on this list.

Fish and other aquatic species appear on your list if they are in the same watershed as your quad or if water use in your quad might affect them. Amphibians will be on the list for a quad or county if pesticides applied in that area may be carried to their habitat by air currents.

Executive Order 13186, January 17, 2001, directs Federal agencies to take specific steps to conserve migratory birds. Species of Concern (see below) are specifically included in this Executive Order. (The Order can be found at www.nara.gov/fedreg/eo.html) Birds are shown on our species lists regardless of whether they are resident or migratory. Relevant birds on the county list should be considered regardless of whether they appear on a quad list.

If a species has been listed as threatened or endangered by the State of California, but not by us nor by the National Marine Fisheries Service, it will appear on your list as a Species of Concern. However you must contact the California Department of Fish and Game for official information about these species. Call (916) 322-2493 or write Marketing Manager, California Department of Fish and Game, Natural Diversity Data Base, 1416 Ninth Street, Sacramento, California 95814.

Some of the species listed in Enclosure A may not be affected by the proposed action. A trained biologist or botanist, familiar with the habitat requirements of the listed species, should determine whether these species or habitats suitable for them may be affected. For plants, we recommend using the enclosed Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Species (Enclosure C).

Some pertinent information concerning the distribution, life history, habitat requirements, and published references for the listed species is available upon request. This information may be helpful in preparing the biological assessment for this project, if one is required. Please see Enclosure B for a discussion of the responsibilities Federal agencies have under section 7(c) of the Act and the conditions under which a biological assessment must be prepared by the lead Federal agency or its designated non-Federal representative.

Formal consultation, under 50 CFR § 402.14, should be initiated if you determine that a listed species may be affected by the proposed project. If you determine that a proposed species may be adversely affected, you should consider requesting a conference with our office under 50 CFR § 402.10. Informal consultation may be utilized prior to a written request for formal consultation to exchange information and resolve conflicts with respect to a listed species. If a biological assessment is required, and it is not initiated within 90 days of your receipt of this letter, you should informally verify the accuracy of this list with our office.

When a species is listed as endangered or threatened, areas of habitat considered essential to its conservation may be designated as critical habitat. These areas may require special management considerations or protection. They provide needed space for growth and normal behavior; food, water, air, light, other nutritional or physiological requirements; cover or shelter; and sites for breeding, reproduction, rearing of offspring, germination or seed dispersal. Although critical

habitat may be designated on private or State lands, activities on these lands are not restricted unless there is Federal involvement in the activities or direct harm to listed wildlife.

If any species has proposed or designated critical habitat within a quad, this will be noted on the species list. Maps and boundary descriptions of the critical habitat may be found in the Federal Register. The information is also reprinted in the Code of Federal Regulations (50 CFR 17.95).

Candidate species are being reviewed for possible listing. Contact our office if your biological assessment reveals any candidate species that might be adversely affected. Although they currently have no protection under the Endangered Species Act, one or more of them could be proposed and listed before your project is completed. By considering them from the beginning, you could avoid problems later.

Your list may contain a section called Species of Concern. This term includes former category 2 candidate species and other plants and animals of concern to the Service and other Federal, State and private conservation agencies and organizations. Some of these species may become candidate species in the future.

If the proposed project will impact wetlands, riparian habitat, or other jurisdictional waters as defined by the U.S. Army Corps of Engineers (Corps), a Corps permit will be required, under section 404 of the Clean Water Act and/or section 10 of the Rivers and Harbors Act. Impacts to wetland habitats require site specific mitigation and monitoring. You may request a copy of the Service's General Mitigation and Monitoring Guidelines or submit a detailed description of the proposed impacts for specific comments and recommendations. If you have any questions regarding wetlands, contact Mark Littlefield at (916) 414-6580.

Please contact Dan Buford at (916) 414-6625, if you have any questions about the attached list or your responsibilities under the Endangered Species Act. For the fastest response to species list requests, address them to the attention of Species Lists at this address. You may fax requests to 414-6712 or 414-6713. You may also email them to harry_mossman@fws.gov.

Attachments

Attachment B

FEDERAL AGENCIES' RESPONSIBILITIES UNDER SECTIONS 7(a) and (c) OF THE ENDANGERED SPECIES ACT

SECTION 7(a) Consultation/Conference

Requires: (1) Federal agencies to utilize their authorities to carry out programs to conserve endangered and threatened species; (2) Consultation with FWS when a Federal action may affect a listed endangered or threatened species to insure that any action authorized, funded, or carried out by a Federal agency is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. The process is initiated by the Federal agency after determining the action may affect a listed species; and (3) Conference with FWS when a Federal action is likely to jeopardize the continued existence of a proposed species or result in destruction or adverse modification of proposed critical habitat.

SECTION 7(c) Biological Assessment-Major Construction Activity¹

Requires Federal agencies or their designees to prepare a Biological Assessment (BA) for major construction activities. The BA analyzes the effects of the action² on listed and proposed species. The process begins with a Federal agency requesting from FWS a list of proposed and listed threatened and endangered species. The BA should be completed within 180 days after its initiation (or within such a time period as is mutually agreeable). If the BA is not initiated within 90 days of receipt of the list, the accuracy of the species list should be informally verified with our Service. No irreversible commitment of resources is to be made during the BA process which would foreclose reasonable and prudent alternatives to protect endangered species. Planning, design, and administrative actions may proceed; however, no construction may begin.

We recommend the following for inclusion in the BA: an on-site inspection of the area affected by the proposal which may include a detailed survey of the area to determine if the species or suitable habitat is present; a review of literature and scientific data to determine species' distribution, habitat needs, and other biological requirement; interviews with experts, including those within FWS, State conservation departments, universities and others who may have data not yet published in scientific literature; an analysis of the effects of the proposal on the species in terms of individuals and populations, including consideration of indirect effects of the proposal on the species and its habitat; an analysis of alternative actions considered. The BA should document the results, including a discussion of study methods used, and problems encountered, and other relevant information. The BA should conclude whether or not a listed or proposed species will be affected. Upon completion, the BA should be forwarded to our office.

A construction project (or other undertaking having similar physical impacts) which is a major federal action significantly affecting the quality of the human environment as referred to in NEPA (42 U.S.C. 4332(2)C).

²⁻Effects of the action" refers to the direct and indirect effects of an action on the species or critical habitat, together with the effects of other activities that are interrelated or interdependent with that action.

Attachment C

GUIDELINES FOR CONDUCTING AND REPORTING BOTANICAL INVENTORIES FOR FEDERALLY LISTED, PROPOSED AND CANDIDATE PLANTS

(September 23, 1996)

These guidelines describe protocols for conducting botanical inventories for federally listed, proposed and candidate plants, and describe minimum standards for reporting results. The Service will use, in part, the information outlined below in determining whether the project under consideration may affect any listed, proposed or candidate plants, and in determining the direct, indirect, and cumulative effects.

Field inventories should be conducted in a manner that will locate listed, proposed, or candidate species (target species) that may be present. The entire project area requires a botanical inventory, except developed agricultural lands. The field investigator(s) should:

- Conduct inventories at the appropriate times of year when target species are present and
 identifiable. Inventories will include all potential habitats. Multiple site visits during a field
 season may be necessary to make observations during the appropriate phenological stage of all
 target species.
- If available, use a regional or local reference population to obtain a visual image of the target species and associated habitat(s). If access to reference populations(s) is not available, investigators should study specimens from local herbaria.
- List every species observed and compile a comprehensive list of vascular plants for the entire
 project site. Vascular plants need to be identified to a taxonomic level which allows rarity to be
 determined.
- Report results of botanical field inventories that include:
 - a description of the biological setting, including plant community, topography, soils, potential
 habitat of target species, and an evaluation of environmental conditions, such as timing or
 quantity of rainfall, which may influence the performance and expression of target species.
 - a map of project location showing scale, orientation, project boundaries, parcel size, and map quadrangle name.
 - survey dates and survey methodology(ies).
 - d. if a reference population is available, provide a written narrative describing the target species reference population(s) used, and date(s) when observations were made.
 - a comprehensive list of all vascular plants occurring on the project site for each habitat type.
 - f. current and historic land uses of the habitat(s) and degree of site alteration.

- g. presence of target species off-site on adjacent parcels, if known.
- an assessment of the biological significance or ecological quality of the project site in a local and regional context.
- If target species is(are) found, report results that additionally include:
 - a map showing federally listed, proposed and candidate species distribution as they relate to the proposed project.
 - b. if target species is (are) associated with wetlands, a description of the direction and integrity of flow of surface hydrology. If target species is (are) affected by adjacent off-site hydrological influences, describe these factors.
 - c. the target species phenology and microhabitat, an estimate of the number of individuals of each target species per unit area; identify areas of high, medium and low density of target species over the project site, and provide acres of occupied habitat of target species. Investigators could provide color slides, photos or color copies of photos of target species or representative habitats to support information or descriptions contained in reports.
 - the degree of impact(s), if any, of the proposed project as it relates to the potential unoccupied habitat of target habitat.
- Document findings of target species by completing California Native Species Field Survey
 Form(s) and submit form(s) to the Natural Diversity Data Base. Documentation of determinations
 and/or voucher specimens may be useful in cases of taxonomic ambiguities, habitat or range
 extensions.
- 7. Report as an addendum to the original survey, any change in abundance and distribution of target plants in subsequent years. Project sites with inventories older than 3 years from the current date of project proposal submission will likely need additional survey. Investigators need to assess whether an additional survey(s) is (are) needed.
- 8. Adverse conditions may prevent investigator(s) from determining presence or identifying some target species in potential habitat(s) of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any year. An additional botanical inventory(ies) in a subsequent year(s) may be required if adverse conditions occur in a potential habitat(s). Investigator(s) may need to discuss such conditions.
- 9. Guidance from California Department of Fish and Game (CDFG) regarding plant and plant community surveys can be found in Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities, 1984. Please contact the CDFG Regional Office for questions regarding the CDFG guidelines and for assistance in determining any applicable State regulatory requirements.

ATTACHMENT A

Endangered and Threatened Species that May Occur in or be Affected by Projects in the Area of the Following California Counties Reference File No. 1-1-03-SP-1983 May 15, 2003

SAN FRANCISCO COUNTY

Listed Species

Mammals

Critical Habitat, Steller (=northern) sea-lion, Eumetopias jubatus (T) NMFS
Guadalupe fur seal, Arctocephalus townsendi (T) NMFS
Steller (=northern) sea-lion, Eumetopias jubatus (T) NMFS
blue whale, Balaenoptera musculus (E) NMFS
finback (=fin) whale, Balaenoptera physalus (E) NMFS
humpback whale, Megaptera novaeangliae (E) NMFS
right whale, Eubalaena glacialis (E) NMFS
salt marsh harvest mouse, Reithrodontomys raviventris (E)
sei whale, Balaenoptera borealis (E) NMFS
sperm whale, Physeter catodon (=macrocephalus) (E) NMFS

Birds

California brown pelican, Pelecanus occidentalis californicus (E)
California clapper rail, Rallus longirostris obsoletus (E)
bald eagle, Hallaeetus leucocephalus (T)
short-tailed albatross, Diomedea albatrus (E)
western snowy plover, Charadrius alexandrinus nivosus (T)

Reptiles

green turtle, Chelonia mydas (incl. agassizi) (T) NMFS
leatherback turtle, Dermochelys coriacea (E) NMFS
loggerhead turtle, Caretta caretta (T) NMFS
olive (=Pacific) ridley sea turtle, Lepidochelys olivacea (T) NMFS

Amphibians

California red-legged frog, Rana aurora draytonii (T)

Fish

Central California Coastal steelhead, Oncorhynchus mykiss (T) NMFS
Critical habitat, winter-run chinook salmon, Oncorhynchus tshawytscha (E) NMFS
Sacramento splittail, Pogonichthys macrolepidotus (T)
coho salmon - central CA coast, Oncorhynchus kisutch (T) NMFS
delta smelt, Hypomesus transpacificus (T) *
tidewater goby, Eucyclogobius newberryi (E)

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winter-run chinook salmon, Oncorhynchus tshawytscha (E) NMFS
   Invertebrates
       San Bruno elfin butterfly, Incisalia mossii bayensis (E)
       mission blue butterfly, Icaricia icarioides missionensis (E)
       white abalone, Haliotes sorenseni (E) NMFS
   Plants
       Marin dwarf-flax (=western flax), Hesperolinon congestum (T)
       Presidio (=Raven's) manzanita, Arctostaphylos hookeri ssp. ravenii (E)
       Presidio clarkia, Clarkia franciscana (E)
       San Francisco lessingia, Lessingia germanorum (E)
       beach layia, Layia camosa (E)
       marsh sandwort, Arenaria paludicola (E)
Candidate Species
   Fish
       green sturgeon, Acipenser medirostris (C)
   Invertebrates
       black abalone, Haliotes cracherodii (C) NMFS
Species of Concern
    Mammals
        Pacific western big-eared bat, Corynorhinus (=Plecotus) townsendii townsendii (SC)
        San Francisco dusky-footed woodrat, Neotoma fuscipes annectens (SC)
        Yuma myotis bat, Myotis yumanensis (SC)
        fringed myotis bat, Myotis thysanodes (SC)
        gray whale, Eschrichtius robustus (D) NMFS
        greater western mastiff-bat, Eumops perotis californicus (SC)
        long-eared myotis bat, Myotis evotis (SC)
        long-legged myotis bat, Myotis volans (SC)
        salt marsh vagrant shrew, Sorex vagrans halicoetes (SC)
    Birds
        Alameda (South Bay) song sparrow, Melospiza melodia pusillula (SC)
        Allen's hummingbird, Selasphorus sasin (SC)
        American bittern, Botaurus lentiginosus (SC)
        American peregrine falcon, Falco peregrinus anatum (D)
        Bell's sage sparrow, Amphispiza belli belli (SC)
        Cassin's auklet, Ptychoramphus aleuticus (SC)
        Harlequin duck, Histrionicus histrionicus (SC)
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Vaux's swift, Chaetura vauxi (SC) Xantus' murrelet, Synthliboramphus hypoleucus (SC) ashy storm-petrel, Oceanodroma homochroa (SC) bank swallow, Riparia riparia (CA) black oystercatcher, Haematopus bachmani (SC) black rail, Laterallus jamaicensis cotumiculus (CA) black skimmer, Rynchops niger (SC) black turnstone, Arenaria melanocephala (SC) black-footed albatross, Diomedia nigripes (SC) elegant tern, Sterna elegans (SC) ferruginous hawk, Buteo regalis (SC) little willow flycatcher, Empidonax traillii brewsteri (CA) loggerhead shrike, Lanius Iudovicianus (SC) long-billed curlew, Numenius americanus (SC) marbled godwit, Limosa fedoa (SC) olive-sided flycatcher, Contopus cooperi (SC) red knot, Calidris canutus (SC) red-breasted sapsucker, Sphyrapicus ruber (SC) rufous hummingbird, Selasphorus rufus (SC) saltmarsh common yellowthroat, Geothlypis trichas sinuosa (SC) tricolored blackbird, Agelaius tricolor (SC) whimbrel, Numenius phaeopus (SC) white-tailed (=black shouldered) kite, Elanus leucurus (SC)

Reptiles

California horned lizard, Phrynosoma coronatum frontale (SC) northwestern pond turtle, Clemmys marmorata marmorata (SC) southwestern pond turtle, Clemmys marmorata pallida (SC)

Amphibians

foothill yellow-legged frog, Rana boylii (SC)

Fish

Pacific lamprey, Lampetra tridentata (SC) longfin smelt, Spirinchus thaleichthys (SC) river lamprey, Lampetra ayresi (SC)

Invertebrates

Opler's longhorn moth, Adela oplerella (SC)
Ricksecker's water scavenger beetle, Hydrochara rickseckeri (SC)
bumblebee scarab beetle, Lichnanthe ursina (SC)

globose dune beetle, Coelus globosus (SC) sandy beach tiger beetle, Cicindela hirticollis gravida (SC)

Plants

California broomrape, Orobanche californica ssp. californica (SLC)

California croton, Croton californicus (SLC)

California goosefoot, Chenopodium californicum (SLC)

California saltbush, Atriplex californica (SLC)

California triquetrella moss, Triquetrella californica (SLC)

Coast Indian paintbrush, Castilleja affinis spp. affinis (SLC)

Davy's clarkia, Clarkia davyi (SLC)

Diablo helianthella (=rock-rose), Helianthella castanea (SC) *

Franciscan thistle, Cirsium andrewsii (SC)

Greene's popcorn flower, Plagiobothrys reticulatus var. rossianorum (SC) *

Kellogg's horkelia, Horkelia cuneata ssp. sericea (SC) *

Mission Delores (=San Francisco) campion, Silene verecunda ssp. verecunda (SC)

Nuttali's milk-vetch, Astragalus nuttallii var. virgatus (SLC)

Pacific cordgrass (=California cordgrass), Sparina foliosa (SLC)

Round-headed Chinese houses, Collinsia corymbosa (SC) *

San Francisco (=bluehead, Chamisso's, dune) gilia, Gilia capitata ssp. chamissonis (SC)

San Francisco Bay spineflower, Chorizanthe cuspidata var. cuspidata (SC)

San Francisco gumplant, Grindelia hirsutula var. maritima (SC)

San Francisco manzanita, Arctostaphylos hookeri ssp. franciscana (SC) **

San Francisco owl's-clover, Triphysaria floribunda (SC)

San Francisco popcomflower, Plagiobothrys diffusus (CA) *

San Francisco wallflower, Erysimum franciscanum (SC)

adobe sanicle, Sanicula maritima (SC) *

alkali milk-vetch, Astragalus tener var. tener (SC) *

coast (=elegant) rein-orchid (=piperia), Piperia elegans (SLC)

coast lily, Lilium maritimum (SC) ?*

coast rock-cress, Arabis blepharophylla (SLC)

compact cobweb thistle, Cirsium occidentale var. compactum (SC) *

curly-leaved (=curlyleaf) monardella, Monardella undulata (SC) *

dune (=camphor) tansy, Tanacetum camphoratum (SC)

fragrant fritillary (= prairie bells), Fritillaria Illiacea (SC)

large-flowered (=flower) linanthus, Linanthus grandiflorus (SC)

marsh microseris (=marsh silverpuffs), Microseris paludosa (SLC) *

pink sand-verbena, Abronia umbellata ssp. umbellata (SLC)

purple owl's-clover (=wideleaf Indian paintbrush), Castilleja exserrta ssp. latifolia (SLC) rose linanthus, Linanthus rosaceus (SC) *
salt marsh owl's clover (=johnny-nip), Castilleja ambigua ssp. ambigua (SLC) seashore (=coast, =beach) starwort, Stellaria littoralis (SC) *
skunkbush, Navarretia squarrosa (SLC) wedgeleaf horkelia, Horkelia cuneata ssp cuneata (SLC) *
yarrow-leaf (=manyleaf, dark-eyed) gilia, Gilia millefoliata (SLC) *

KEY:

(E)	Endangered	Listed (in the Federal Register) as being in danger of extinction.
(T)	Threatened	Listed as likely to become endangered within the foreseeable future.
(P)	Proposed	Officially proposed (in the Federal Register) for listing as endangered or threatened.
(PX)	Proposed Critical Habitat	Proposed as an area essential to the conservation of the species.
(C)	Candidate	Candidate to become a proposed species.
(SC)	Species of Concern	Other species of concern to the Service.
(SLC)	Species of Local Concern	Species of local or regional concern or conservation significance.
(D)	Delisted	Delisted. Status to be monitored for 5 years.
(CA)	State-Listed	Listed as threatened or endangered by the State of California.
NMFS	NMFS species	Under jurisdiction of the National Marine Fisheries Service. Contact them directly.
	Extirpated	Possibly extirpated from the area.
**	Extinct	Possibly extinct
	Critical Habitat	Area essential to the conservation of a species.

ATTACHMENT A

Endangered and Threatened Species that May Occur in or be Affected by Projects in the Selected Quads Listed Below Reference File No. 1-1-03-SP-1983 May 15, 2003

QUAD: 467D POINT BONITA

Listed Species

Mammals

Guedalupe fur seal, Arctocephalus townsendi (T) NMFS
sei whale, Balaenoptera borealis (E) NMFS
blue whale, Balaenoptera musculus (E) NMFS
finback (=fin) whale, Balaenoptera physalus (E) NMFS
right whale, Eubalaena glacialis (E) NMFS
Critical Habitat, Steller (=northern) sea-lion, Eumetopias jubatus (T) NMFS
Steller (=northern) sea-lion, Eumetopias jubatus (T) NMFS
sperm whale, Physeter catodon (=macrocephalus) (E) NMFS
salt marsh harvest mouse, Reithrodontomys raviventris (E)

Birds

Critical habitat, marbled murrelet, Brachyramphus marmoratus (T)
marbled murrelet, Brachyramphus marmoratus (T)
western snowy plover, Charadrius alexandrinus nivosus (T)
short-tailed albatross, Diomedea albatrus (E)
bald eagle, Haliaeetus leucocephalus (T)
California brown pelican, Pelecanus occidentalis californicus (E)
California clapper rail, Rallus longirostris obsoletus (E)
California least tem, Sterna antillarum (=albifrons) browni (E)

Reptiles

loggerhead turtle, Caretta caretta (T) NMFS
green turtle, Chelonia mydas (incl. agassizi) (T) NMFS
leatherback turtle, Dermochelys coriacea (E) NMFS
olive (=Pacific) ridley sea turtle, Lepidochelys olivacea (T) NMFS

Amphibians

California red-legged frog, Rana aurora draytonii (T)

Fish

tidewater goby, Eucyclogobius newberryi (E)

delta smelt, Hypomesus transpacificus (T)

Critical habitat, coho salmon - central CA coast, Oncorhynchus kisutch (T) NMFS

coho salmon - central CA coast, Oncorhynchus kisutch (T) NMFS
Central California Coastal steelhead, Oncorhynchus mykiss (T) NMFS
Central Valley steelhead, Oncorhynchus mykiss (T) NMFS
winter-run chinook salmon, Oncorhynchus tshawytscha (E) NMFS
California coastal chinook salmon, Oncorhynchus tshawytscha (T) NMFS
Central Valley spring-run chinook salmon, Oncorhynchus tshawytscha (T) NMFS
Sacramento splittail, Pogonichthys macrolepidotus (T)

Invertebrates

white abalone, Haliotes sorenseni (E) NMFS
mission blue butterfly, Icaricia icarioides missionensis (E)
San Bruno elfin butterfly, Incisalia mossii bayensis (E)

Plants

Sonoma spineflower, Chorizanthe valida (E) *
white-rayed pentachaeta, Pentachaeta bellidiflora (E) *

Candidate Species

Fish

green sturgeon, Acipenser medirostris (C)

Central Valley fall/late fall-run chinook salmon, Oncorhynchus tshawytscha (C) NMFS
Critical habitat, Central Valley fall/late fall-run chinook, Oncorhynchus tshawytscha (C) NMFS

Invertebrates

black abalone, Haliotes cracherodii (C) NMFS

Species of Concern

Mammals

Point Reyes mountain beaver, Aplodontia rufa phaea (SC)

Pacific western big-eared bat, Corynorhinus (=Plecotus) townsendii townsendii (SC)

gray whale, Eschrichtius robustus (D) NMFS

greater western mastiff-bat, Eumops perotis californicus (SC)

long-eared myotis bat, Myotis evotis (SC)

fringed myotis bat, Myotis thysanodes (SC)

long-legged myotis bat, Myotis volans (SC)

Yuma myotis bat, Myotis yumanensis (SC)

San Francisco dusky-footed woodrat, Neotoma fuscipes annectens (SC)

Point Reyes jumping mouse, Zapus trinotatus orarius (SC)

Birds

tricolored blackbird, Agelaius tricolor (SC)

Bell's sage sparrow, Amphispiza belli belli (SC)

black turnstone, Arenaria melanocephala (SC) western burrowing owl, Athene cunicularia hypugaea (SC) ferruginous hawk, Buteo regalis (SC) red knot, Calidris canutus (SC) Vaux's swift, Chaetura vauxi (SC) black swift, Cypseloides niger (SC) white-tailed (=black shouldered) kite, Elanus leucurus (SC) little willow flycatcher, Empidonax trailiii brewsteri (CA) prairie falcon, Falco mexicanus (SC) American peregrine falcon, Falco peregrinus anatum (D) saltmarsh common yellowthroat, Geothlypis trichas sinuosa (SC) black systercatcher, Haematopus bachmani (SC) Harleguin duck, Histrionicus histrionicus (SC) loggerhead shrike, Lanius Iudovicianus (SC) black rail, Laterallus jamaicensis columiculus (CA) marbled godwit, Limosa fedoa (SC) Lewis' woodpecker, Melanerpes lewis (SC) long-billed curlew, Numenius americanus (SC) whimbrel, Numenius phaeopus (SC) ashy storm-petrel, Oceanodroma homochroa (SC) bank swallow, Riparia riparia (CA) black skimmer, Rynchops niger (SC) rufous hummingbird, Selasphorus rufus (SC) Allen's hummingbird, Selasphorus sasin (SC) elegant tern, Stema elegans (SC) Reptiles northwestern pond turtle, Clemmys marmorata marmorata (SC) California horned lizard, Phrynosoma coronatum frontale (SC) Amphibians Northern red-legged frog, Rana aurora aurora (SC) foothill yellow-legged frog, Rana boylii (SC) Fish Pacific lamprey, Lampetra tridentata (SC) longfin smelt, Spirinchus thaleichthys (SC) Invertebrates

Opler's longhorn moth, Adela oplerella (SC)

sandy beach tiger beetle, Cicindela hirticollis gravida (SC)

globose dune beetle, Coelus globosus (SC)

Ricksecker's water scavenger beetle, Hydrochara rickseckeri (SC)

Marin elfin butterfly, Incisalia mossii marinensis (SC)

bumblebee scarab beetle, Lichnanthe ursina (SC)

Plants

pink sand-verbena, Abronia umbellata ssp. umbellata (SLC)

coast rock-cress, Arabis blepharophylla (SLC)

Nuttall's milk-vetch, Astragalus nuttallii var. virgatus (SLC)

marsh milkvetch (=brine milk-vetch), Astragalus pycnostachyus var. pycnostachyus (SLC)

California saltbush, Atriplex californica (SLC)

Coast Indian paintbrush, Castilleja affinis spp. affinis (SLC)

salt marsh owl's clover (=johnny-nip), Castilleja ambigua ssp. ambigua (SLC)

purple owl's-clover (=wideleaf Indian paintbrush), Castilleja exserrta ssp. latifolia (SLC)

Franciscan thistle, Cirsium andrewsii (SC)

Davy's clarkia, Clarkia davyi (SLC)

Round-headed Chinese houses, Collinsia corymbosa (SC) *?

Tiburon buckwheat, Eriogonum caninum (SLC)

San Francisco wallflower, Erysimum franciscanum (SC)

San Francisco (=bluehead, Chamisso's, dune) gilia, Gilia capitata ssp. chamissonis (SC)

San Francisco gumplant, Grindelia hirsutula var. maritima (SC)

Kellogg's horkelia, Horkelia cuneata ssp. sericea (SC) *

large-flowered (=flower) linanthus, Linanthus grandiflorus (SC) *?

curly-leaved (=curlyleaf) monardella, Monardella undulata (SC) *?

KEY:

(E)	Endangered	Listed (in the Federal Register) as being in danger of extinction.
(T)	Threatened	Listed as likely to become endangered within the foreseeable future.
(P)	Proposed	Officially proposed (in the Federal Register) for listing as endangered or threatened.
(PX)	Proposed Critical Habitat	Proposed as an area essential to the conservation of the species.
(C)	Candidate	Candidate to become a proposed species.
(SC)	Species of Concern	May be endangered or threatened. Not enough biological information has been gathered to support listing at this time.
(SLC)	Species of Local Concern	Species of local or regional concern or conservation significance.
(MB)	Migratory Bird	Migralory bird
NMFS	NMFS species	Under the jurisdiction of the National Marine Fisheries Service. Contact them directly.
(D)	Delisted	Delisted. Status to be monitored for 5 years.
(CA)	State-Listed	Listed as threatened or endangered by the State of California.
(*)	Extirpated	Possibly extirpated from this quad.
(**)	Extinct	Possibly extinct.
,	Critical Habitat	Area essential to the conservation of a species.
	Childen Frontier	



June 9, 2003

John Gervais Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, California 94123

SUBJECT: Environmental Assessment for the Long-Term Lease of the Fort

Mason Center from the National Park Service to the Fort Mason

Foundation

Dear Mr. Gervais:

On May 6, 2003, San Francisco Bay Conservation and Development Commission (Commission) staff received your letter regarding the preparation of an Environmental Assessment that will evaluate the potential impacts of a 60-year lease between the National Park Service (NPS) and the Fort Mason Foundation (FMF) for the continuing operation of the Fort Mason Center (FMC). Your letter states that under the new lease agreement, FMF would: (1) perform all functions under the current agreement; and (2) assume responsibility for the maintenance of the site, including the seismic upgrading of the historic buildings and rehabilitation and renovation of Pier One. Under the new lease agreement, the NPS would also remain responsible for the rehabilitation and maintenance of all the pier substructures and the seawall. Your letter requests the identification of any significant environmental issues that may be related to the new long-term lease agreement. Outlined below are the types of environmental and policy issues staff believes could be raised as a result of this project. First, however, we would like to take this opportunity to inform you that we believe the submittal of a consistency determination to the Commission will be necessary for this project.

Need for a Consistency Determination

Section 307(c)(1) of the federal Coastal Zone Management Act (CZMA) requires a federal agency such as the National Park Service to conduct its activities that would affect the coastal zone in a manner that is consistent to the maximum extent practicable with the federally-approved coastal management

program for the part of the coastal zone that the activity would affect. The coastal zone for San Francisco Bay includes the Commission's San Francisco Bay and shoreline band jurisdictions under the McAteer-Petris Act. However, the CZMA exempts from the coastal zone federal enclaves and federal lands subject to the exclusive jurisdiction of the federal government. The Commission's federally approved management program for the San Francisco Bay segment of the California coastal zone acknowledges that this exemption applies to all federally-owned and federally leased lands, at least until a court decision concludes otherwise or Congress changes the law.

The Commission staff believes that FMF would need to obtain a .

Commission permit for rehabilitation and renovation of Pier One and the other pier structures and seawall. The Commission staff also believes that NPS should submit a consistency determination for the lease with FMF and the future work that the lease will require FMF to complete.

Consistency with the McAteer-Petris Act and the San Francisco Bay Plan.

When the Commission evaluates the types of activities that would result from the long-term lease, particularly maintenance and rehabilitation of the FMC facilities on piers constructed prior to 1965, it must determine whether the Commission will apply only those McAteer-Petris Act and San Francisco Bay Plan policies that apply to activities that occur within the Commission's shoreline band jurisdiction or whether the Commission will apply those policies that apply to activities that occur within San Francisco Bay. In making this determination concerning a pier that was originally constructed before the Commission obtained its jurisdiction over activities that occur in San Francisco Bay, the Commission relies on two informal opinions of the California Attorney General's office dated October 8, 1986 and a second opinion dated October 9, 1992.

In these opinions, the Attorney General's office advised the Commission that when a proposed development upon a pier involves work to the pier itself or its substructure, the scope of the Commission's permit review, and whether the Commission's "Bay" jurisdiction is triggered, varies with the physical extent, nature, and purpose of the work. The Attorney General's office advised that routine repairs, such as those that are necessary to keep pace with the ordinary wear and tear suffered by an existing structure do not change the essential utility of the structure or allow the structure to be perpetuated indefinitely through the periodic repetitions of such work, would not affect the Commission's applying its shoreline band policies to piers that were constructed prior September 17, 1965, the date the Commission obtained its permit jurisdiction over San Francisco Bay. However, the Attorney General's office also advised that "...[a]nything beyond such routine repairs tends toward creation of what is essentially a 'new' structure, in that the structure is, at the very least, one that is significantly different from

what existed prior to the work in terms of its utility or life expectancy or the time period that will be necessary to amortize its overall cost... Accordingly, any such work on a pier should be treated as 'further filling' of the Bay within the meaning of Section 66605...." Therefore, the Attorney General's office concluded that the Commission should evaluate the following factors when deciding whether a proposed fill project is a minor modification, which the Commission would review under its shoreline band policies, or involves substantial work to replace, stabilize, or reinforce the existing structure, which the Commission would review under the more restrictive policies that apply to the placement of fill in San Francisco Bay: (1) the nature of the work; (2) the physical extent of the work; and (3) whether or not the work is proposed in conjunction with a proposed change in the type of use supported by the pier.

If the work proposed for the piers goes beyond routine repair and maintenance, the Commission must evaluate the proposed project for consistency with Commission policies that apply to the placement of fill within San Francisco Bay rather than policies that apply to activities within the shoreline band.

- 1. Section 66605 of the McAteer-Petris Act. Among other requirements, Section 66605 of the McAteer-Petris Act requires that fill in the Bay should only be authorized when: (1) the public benefits from the fill clearly exceed public detriment from the loss of water areas; (2) the fill is limited to water-oriented uses or minor fill to improve shoreline appearance or public access; (3) there is no alternative upland location; (4) the fill is the minimum amount necessary; (5) the fill minimizes harmful effects to the bay, such as the reduction or impairment of the volume, surface area, or circulation of water, water quality, fertility of marshes or fish and wildlife resources; and (6) that the fill will, to the maximum extent feasible, establish a permanent shoreline.
- 2. Regulation Section 10704. If the current uses of the pier are not necessarily water-oriented, as specified in Section 66605(a) of the McAteer-Petris Act, then Regulation Section 10704 becomes important. Regulation Section 10704 states, in part, that "[t]he Commission may approve fill as necessary to the welfare of the public in the entire Bay Area to protect historic structures...." Regulation Section 10704 includes a number of tests that a project must meet before it can qualify for approval under this section. In this case, the Commission must find and declare that: (1) "the fill would be necessary to repair, maintain or rehabilitate a structure that has been listed on the National Register of Historic Places or as California Registered Historical Landmark"; (2) "the repair, maintenance or

> rehabilitation project would be limited to the site of the historic structure and would not result in a significant increase in Bay coverage"; (3) "the fill is necessary because it is physically impracticable to repair, maintain or rehabilitate the structure without filling"; (4) "the amount and type of fill is the minimum necessary and the least detrimental to accomplish the repair, maintenance or rehabilitation of the structure"; (5) "the repair, maintenance or rehabilitation project including all fill associated with the project, would not alter the structure's historical designation"; (6) "the repair, maintenance, or rehabilitation project, including all fill associated with the project, would not adversely affect the present or future use of the area for water-oriented priority lands uses..."; (7) "maximum feasible public access would be provided as part of the repair, maintenance or rchabilitation project"; and (8) "the repair, maintenance or rehabilitation project, including all fill associated with the project, would comply with the provisions of Regulation Sections 66661 et seq, and the San Francisco Bay Plan, except those policies limiting fill to water-oriented uses."

The environmental assessment should clearly define the project and analyze its consistency with the McAteer-Petris Act, the Bay Plan, and Commission Regulation Section 10704.

Public Access

Section 66602 of the McAteer-Petris Act states, in part, that: "existing public access to the shoreline and waters of the San Francisco Bay is inadequate and that maximum feasible public access, consistent with a proposed project, should be provided...." The San Francisco Bay Plan policies on public access further state that "maximum feasible public access should be provided in and through every new development in the Bay or on the shoreline...the access should be permanently guaranteed...should be consistent with the physical environment, including protection of natural resources...provide for the public's safety and convenience...and built to encourage diverse Bay related activities and movement to and along the shoreline...."

The environmental assessment should include a description of the existing public access at FMC, how the proposed project could impact existing public access, and where new public access will or could be provided.

Conclusions

Thank you for the opportunity to comment on this scoping letter for the Environmental Assessment to be prepared for the Long-Term Lease of FMC. If you have any questions regarding this letter or the Commission's policies, please call me at (415) 352-3618.

Sincerely,

Coastal Program Analysi



Appendix C



ENVIRONMENTAL ASSESSMENT DISTRIBUTION LIST

FORT MASON CENTER LONG-TERM LEASE ENVIRONMENTAL ASSESSMENT DISTRIBUTION LIST

Notes:

15 copies were sent to the California State Clearinghouse with a Notice of Completion Copies were provided to each of the FMC resident organizations through internal mail Copies were provided to NPS staff through internal mail

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Appendix D



TRANSPORTATION DEMAND MANAGEMENT PLAN

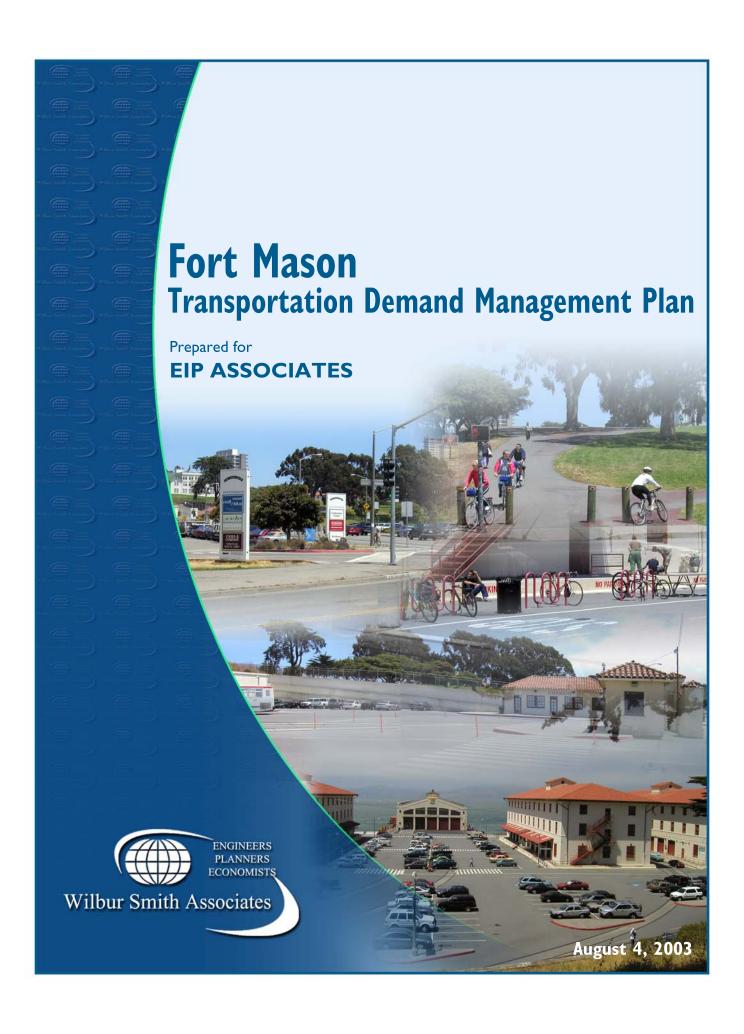


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1.0 Introduction

1.1 FORT MASON AND FORT MASON CENTER

Fort Mason is located along the San Francisco waterfront between Fisherman's Wharf and the Golden Gate Bridge (see Figure 1). Used as a military facility for over 200 years, the 13-acre Fort Mason was converted to peacetime use in the 1970's as part of the Golden Gate National Recreation Area and was designated a National Historic Landmark in 1985. The Fort Mason Foundation was created in 1976 to convert the empty buildings into a much-needed cultural center focusing on visual and performing arts, humanities, education, ecology and recreation. In January 1977, Fort Mason Center opened to the public.

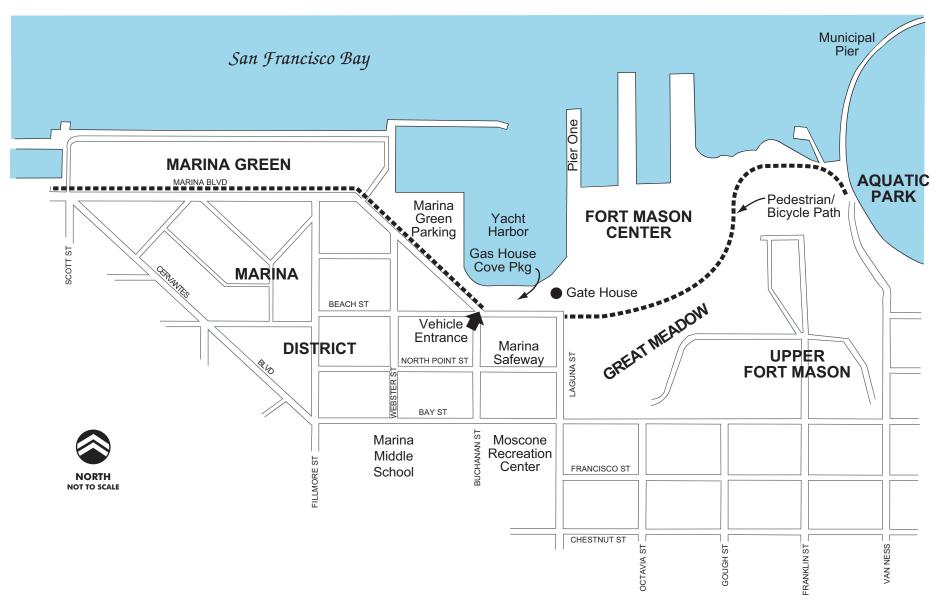


View of Fort Mason Center from the Great Meadow

Fort Mason includes three distinct areas: Upper Fort Mason, the Great Meadow, and the Fort Mason Center (FMC). Upper Fort Mason, located on a bluff overlooking Fort Mason Center and Aquatic Park, houses administrative offices for the Golden Gate Branch of the National Park Service, an Officer's Club, housing and the San Francisco Youth Hostel. Adjacent to Upper Fort Mason, also on a bluff overlooking Fort Mason Center, is the Great Meadow. Once the site of military buildings; the Great Meadow is now public open space providing scenic vistas of the Golden Gate Bridge, San Francisco Bay and the Marina District.

The focus of this plan is the Fort Mason Center. The Center, operated by the Fort Mason Foundation (FMF), is a non-profit community and cultural center for San Francisco and the Bay Area; it has become a model for the conversion of military facilities to peacetime use. Rich in historical significance, Fort Mason Center is as busy today as it was during World War II and the Korean Conflict when it served as the embarkation point for troops and supplies shipped to the Pacific. Today, the Fort Mason Center hosts more than 15,000 events each year which attract approximately 1.6 million visitors. The Fort Mason Center contains theaters, museums, a variety of conference/meeting rooms to accommodate from 5 to 5,000 people as well as the offices of about 40 non-profit tenants. The tenants of Fort Mason Center are referred to as "residents". Current resident organizations include:

- Blue Bear School of American Music Private and group instruction in music
- City College of San Francisco Fort Mason Art Campus Art instruction
- Environmental Traveling Companions Provides outdoor adventure trips to people with emotional and physical disabilities and youth at risk
- Friends of the San Francisco Public Library Bookstore
- Greens Restaurant Gourmet vegetarian lunches and dinners
- Oceanic Society Environmental education and research through naturalist-led trips including Whale Watch and Farallon Islands cruises





Fort Mason Transportation Demand Management Plan

- Performing Arts Workshop Instruction in creative movement, drama and ethnic dance
- Ploughshares Fund Foundation that works to control proliferation of weapons of mass destruction and promote cooperative international security measures
- Radio Bilingüe Public radio network that distributes Spanish-language news, music, drama and arts programming
- San Francisco Maritime National Historic Park Library and storage facility for documents relating the saga of the people and ships that shaped the development of the Pacific Coast
- Western Public Radio Independent traing and production facility

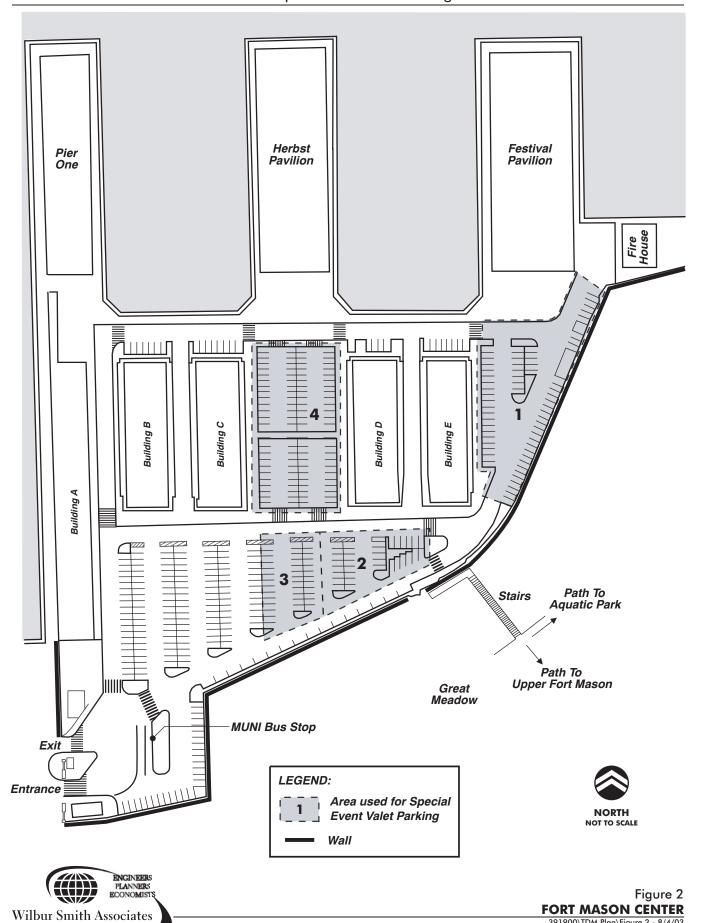
Museums

- Museum of Craft & Folk Art Gallery, gift shop and educational programs that promote the understanding and appreciation of human expression
- The Mexican Museum Gallery voicing the complexity and richness of Latino art throughout the Americas
- Museo ItaloAmericano Gallery, library, offices, educational programs and gift shop dedicated to researching, collecting and displaying works of Italian and Italian American artists
- San Francisco African American Historical & Cultural Society Gallery that features African and African American culture, arts and crafts
- San Francisco Museum of Modern Art Artists Gallery Gallery representing more than 1,300 Northern California artists, with works available for rental and for sale

Theater

- Magic Theater Presenting new plays by recognized playwrights as well as innovative works by emerging writers
- BATS Improv at Bayfront Theater An improvisational theater company and School of Improv
- Blue Bear Performance Hall Blue Bear School of American Music operates a small stage used for school rehearsals and performances and occasional independent stage production
- Cowell Theater Home to an array of events including dance, theater, seminars, conferences, community activities and corporate events
- Young Performers Theater Professional children's theater, classes in the dramatic arts and private birthday parties

The Fort Mason Center is comprised of nine buildings (Buildings A-D, Piers 1-3, Gatehouse and Firehouse) including three pier-mounted shed buildings on parallel piers (see Figure 2). Buildings A-D house the non-profit residents. The Conference Center, located in Building A, and various meeting and activity rooms in Buildings B and C are available for rent to the public. Pier Three includes the Festival Pavilion. Pier Two holds the Cowell Theater and Herbst Pavilion. It is currently undergoing structural rehabilitation and seismic retrofit. Pier One, also in need of both seismic and infrastructure repair, is mostly vacant except for the portion used for storage and as a construction staging site for the rehabilitation of Pier Two. Pier One was not part of the original Fort Mason agreement but was assigned to the Fort Mason Foundation by amendment in July 2002. Building E which is included in the Fort Mason complex is not part of the Fort Mason Foundation but is operated and maintained by the San Francisco Maritime National Historic Park. Building E has four assigned parking spaces in the FMC lot, and the occupants and visitors of Building E use the FMC parking.



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1.2 Purpose of the Fort Mason Transportation Demand Management (TDM) Plan

Transportation demand management (TDM) is a broad term for strategies that result in more efficient use of transportation resources. Generally, TDM strategies are developed in a TDM Plan which focuses on providing relief from traffic congestion and unmet parking demand. The approaches used in a TDM Plan will range from physical improvements to the existing system, changes in land use and travel patterns or the promotion of alternative transportation modes such as transit, bicycling and walking. The benefits realized through a successful TDM Program can include reduced traffic congestion, decrease in the need for costly and unattractive auto parking facilities, improvements to air quality, and increased opportunities for healthy exercise associated with transit, bicycle and pedestrian travel.

Currently, the Fort Mason Foundation has a well developed TDM Program in effect which is designed to accommodate the traffic and parking demands of the broad range of events and activities they offer. The purpose of the Fort Mason Transportation Demand Management (TDM) Plan is to document and review these programs and recommend enhancements to improve the effectiveness of the existing TDM Program.

This report begins with a discussion of the existing transportation facilities serving Fort Mason including motor vehicle access and parking, transit service, non-motorized facilities and the characteristics of existing travel to Fort Mason. The next section describes the existing TDM practices in use by the Fort Mason Center. The final section includes recommendations to enhance the existing TDM program.

2.0 EXISTING TRANSPORTATION FACILITIES

2.1 MOTOR VEHICLE ACCESS

For regional access to Fort Mason, motorists from the North Bay can use the Golden Gate Bridge and Doyle Drive to the Marina Exit and Marina Boulevard. From the South Bay, drivers can use US 101 to the Ninth Street Exit or the Mission Street Exit and travel north on Franklin Street or Van Ness Avenue to Bay Street, Buchanan Street and Marina Boulevard. From the East Bay, drivers can use the San Francisco-Oakland Bay Bridge to the Fremont Street Exit and travel east on Howard Street and north on The Embarcadero to Bay Street, Buchanan Street and Marina Boulevard, or use the Ninth Street Exit and travel north on Franklin Street to Bay Street, Buchanan Street and Marina Boulevard.

Fort Mason Center is reached by traveling through the Marina District, a desirable residential and thriving commercial area of San Francisco. Local access to Fort Mason Center is provided by Marina Boulevard to the west, Franklin Street and Van Ness Avenue to the south, and Bay Street to the east (see Figure 2).

From the adjacent streets, vehicle access to Fort Mason Center is provided via a single entry/exit access point located at the northern leg of the Marina Boulevard and Buchanan Street intersection, opposite the Marina Safeway. The intersection is controlled by traffic signals. The large signs, located on the northeast and northwest corners, heralding the entrance, include several large advertisements for clients, residents and venues. The identification of Fort Mason Center is small in comparison and would be difficult to read by passing motorists. In addition, the entrance directional arrows are low to the ground and would likely be blocked by intervening vehicles. Between the intersection and Fort Mason, motorists drive



Entrance to Gas House Cove Parking and Fort Mason Center

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Fort Mason Transportation Demand Management Plan

through the Gas House Cove surface parking lot that is owned and maintained by the City of San Francisco and serves the city yacht harbor.

The actual entrance to Fort Mason Center is located at the east end of this parking lot. The entrance provides a single travel lane that is separated from the single-lane exit by approximately 40 feet. Within this separation are a wall and a gatehouse structure. As shown in Figure 2, a wide turnaround area is provided immediately inside the Fort Mason entrance. This area is provided primarily for a bus stop and turnaround serving the City of San Francisco MUNI line #28. This entrance area is complex and can be confusing to motorists



Gate House at Fort Mason Entrance

unfamiliar with the site. Directional signage to the various attractions is provided within the circulation and parking area; although this signage is very informative it is also very complicated and difficult to read while driving. The Fort Mason Center had a consultant develop a new signage/wayfinding plan to address these and other issues, but funds are not available at this time to implement the program. There is also a need to improve the lighting, pavement markings, and channelization of the parking lots at Fort Mason Center. Many of the pavement markings are faded and may not be readable especially at night. A series of concrete bollards along Building A have not been treated with reflective materials and so may cause a hazard at night.



Bus Turnaround

2.2 PARKING

Within the gate at the entrance to Fort Mason there are a total of 450 surface lot parking spaces. With the exception of 13 spaces designated for accessible parking for persons with disabilities, there are no parking restrictions on the use of these spaces and there is no charge for parking. The spaces can be used by tenants, staff and/or visitors to Fort Mason. The FMC currently employs a variety of transportation demand management (TDM) techniques and measures to accommodate tenant and visitor parking demands during the full range of events and activities that occur throughout the year at Fort Mason. This TDM program, discussed in detail in Section 3, employs many strategies including valet parking, reserved parking on adjacent lots and remote parking facilities. Use of the parking lots can be confusing and even hazardous at night due to insufficient lighting and faded pavement markings.



Bollards along Building A

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2.3 Transit

Transit service to Fort Mason is provided by the San Francisco Municipal Railway (MUNI). Refer to Figure 3 for map of transit access. The only transit line serving Fort Mason Center directly is MUNI route 28-19th Avenue, a bus route that travels between Fort Mason and the Daly City BART Station via Lombard Street, Golden Gate Bridge Toll Plaza, the Presidio, and 19th Avenue. Several other MUNI bus routes run near Fort Mason, but require walking three to six blocks from Van Ness Avenue, Fillmore Street, or Chestnut Street. These routes provide linkages to most of San Francisco and to the regional transit network nodes located along Market Street and at the Transbay Terminal in downtown San Francisco. They are Muni's route 10-Townsend, 22-Fillmore, 30-Stockton, 47-Van Ness, and 49-Van Ness/Mission. Weekday peak hour service is provided by 82X-Presidio/Wharves Express and 30X-Stockton Express.

Regional transit service is available with transfer to one of the previously mentioned MUNI routes. All Golden Gate Transit buses stop at the Golden Gate Toll Plaza where a transfer can be made to MUNI route 28-19th Avenue. Access from CalTrain is available via MUNI routes 30-Stockton or 47-Van Ness. The Transbay Terminal is connected to Fort Mason with MUNI route 10-Townsend. From BART/MUNI Powell Street Station, a transfer can be made to MUNI route 30-Stockton. Access to Fort Mason from the Ferry Building is available with MUNI route F-Market and Wharves but requires approximately a 1-mile walk from the route terminus. More direct connection can be reached via MUNI route 30-Stockton near the Powell Street BART/MUNI Station.

2.4 BICYCLE AND PEDESTRIAN

Fort Mason is located on a recreational trail that extends all the way from the Fisherman's Wharf area to Fort Point under the Golden Gate Bridge via Aquatic Park, the Marina Green, and Crissy Field in the Presidio. This path travels from Fisherman's Wharf through Upper Fort Mason and the Great Meadow. Fort Mason Center can be accessed by a set of stairs from the Great Meadow or from the pathway which terminates on Marina Boulevard near the Fort Mason gate house. This section of path has a significant slope with cyclists often traveling at high speeds. The trail then resumes at the corner of Buchanan Street and Marina Boulevard and continues to Fort Point.

To enter Fort Mason Center, pedestrians and bicyclists can use a pedestrian/bicycle entrance located near the terminus of the Fisherman's Wharf trail at Marina Boulevard. sidewalk connection between the path terminus and the entrance is very narrow for both bicycle and pedestrian use. Pedestrians and bicyclists entering Fort Mason Center from the Marina Green may travel through the Gas House parking lot. Bicycle and foot traffic in the parking lot adds to the existing congested conditions in the lot especially during large events. The sidewalk along Marina Boulevard may be used as an alternative to walking through the parking lot; however, the Marina Boulevard sidewalk has many signs and posts which reduce its effective width. Pedestrians and bicyclists entering FMC from either direction must travel through the main entrance. As discussed in Section 2.1 above, this area is very confusing for motorists, pedestrians and bicyclists alike.

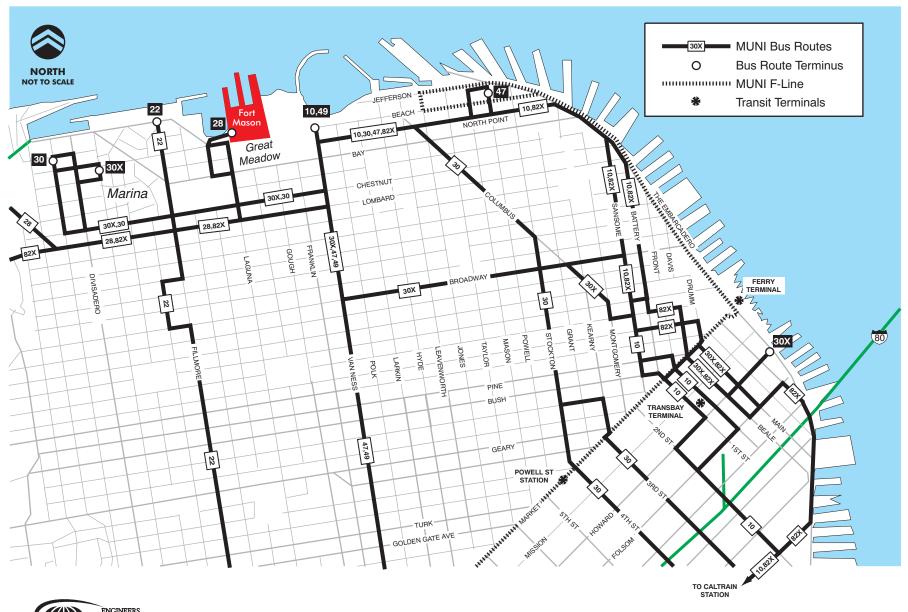


Terminus at Marina Blvd of Path from Fisherman's Wharf



Narrow Connection between Path and Fort Mason Center

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Fort Mason Transportation Demand Management Plan







The on-street bicycle facilities closest to Fort Mason Center are bicycle lanes on Bay Street between Fillmore and Laguna Streets, bicycle route on Bay Street for the one block between Laguna and Octavia Streets, wide curb lane bike route on Octavia Street between Bay and Green Streets, and bike lanes on Francisco Street between Octavia and Polk Streets.

Bicycle parking at Fort Mason Center is provided by three ribbon racks located at the end of Building B. Additional racks are located adjacent to Buildings C and D and the Firehouse.

Bicycle and pedestrian access in the vicinity of Fort Mason Center is not within the scope of this plan or within the jurisdiction of Fort Mason Center. However, FMC staff and visitors traveling by bicycle and on foot will be affected by surrounding conditions. Furthermore, vehicle circulation to and within Fort Mason Center is impacted by how efficiently the various modes are accommodated. To that end, the Fort Mason Center should continue to pursue implementation of the new wayfinding/signage program and should support and participate in efforts to improve bicycle and pedestrian circulation in the area such as with the "Northern Waterfront Public Access and Bicycle Circulation Study" discussed in Section 2.6.

2.5 EXISTING TRAVEL PATTERNS

The selection of appropriate transportation demand management measures is dependent in large part upon how and from where travelers are currently accessing the destination which in this case is Fort Mason Center. The most recent data available can be found in the Fort Mason Transportation Study (1995). This study was prepared by Wilbur Smith Associates to address transportation concerns and to create a plan to accommodate visitor growth at the Fort Mason Center. Many of the current transportation demand management practices discussed in Section 3 were derived from this study. Parking and travel conditions were observed on three different days in September and October 1995; a typical weekday, a small-event weekend day and a large event weekend day. Findings of this study for mode split and location of trip origin are discussed below.

Mode Split

Table 1 shows the mode of transportation used for each study day to enter Fort Mason Center. The survey includes both visitors and workers, but does not include people entering via the stairs to the Great Meadow/Upper Fort Mason. The busiest day was found to be the small-event, or typical, weekend.

Ridesharing (carpooling) is by far the most popular mode of travel used on the weekends while single-occupant vehicles are the norm on weekdays. The average number of people in each vehicle ranges from 1.4 on weekdays to 1.75 on weekends. Bus use ranges from 3 to 5 percent. The number of pedestrians walking to Fort Mason is high: comprising 15 to 26 percent of all visitors. The count of pedestrians included people who parked off-site and walked into Fort Mason Center.

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Table 1
Mode Split and Number of People per Vehicle
Fort Mason Center

Mode	Weekday	Non-Event Weekend	Event Weekend
Drive Alone + Rideshare	80%	77%	71%
Bus	5%	2%	3%
Walk & Bike	15%	21%	26%
Average Vehicle Occupancy	1.31 persons/vehicle	1.78 persons/vehicle	1.78 persons/vehicle

SOURCE: Fort Mason Transportation Study, Wilbur Smith Associates, 1995.

Origins of Trips to Fort Mason

Visitors and employees interviewed at Fort Mason were asked where they began their trip that day. More than three-fourths indicated San Francisco, with a majority indicating neighborhoods in the northeastern core area of the City. The next largest origin is the western neighborhoods, primarily the Sunset and Richmond districts.

2.6 LONG-TERM TRANSPORTATION IMPROVEMENTS

Two significant transit improvement projects that would improve access to Fort Mason are under consideration. The first is the potential extension of MUNI E/F-Line Historic Trolley Service to Fort Mason. Existing service, called the F-line, extends from the Castro District via Market Street and The Embarcadero to Jones Street in the Fisherman's Wharf area. For many years it has been proposed that this line be extended to Fort Mason via the unused tracks through Aquatic Park and the existing railroad tunnel that exists under the hill on which Upper Fort Mason is located. The concept of a further extension to the Presidio has also been discussed. This new service, called the E-Line, would run from the Caltrain Station, past PacBell Park, along The Embarcadero to Jefferson Street and then through the tunnel to Fort Mason Center. The Presidio Trust has funding to conduct a feasibility study this fiscal year of this extension in cooperation with MUNI and the National Park Service. In addition, the National Park Service allocated funding in FY04 to study the seismic condition of the tunnel and environmental compliance of the project. Further, the San Francisco County Transportation Authority (SFCTA) designated the E-Line extension for funding under the proposed sales tax extension. MUNI is committed to begin E-Line operation to Fisherman's Wharf in 2004. If implemented, it would have a positive impact on transportation access to the Fort Mason Center by potentially reducing the needs for automobile travel to the site.

The second transit improvement under consideration is the potential implementation of waterborne passenger ferry service to Fort Mason. The California State legislature has established the Water Transit Authority (WTA) to develop an improved network of ferry services on San Francisco Bay. The implementing legislation that established the WTA (Government Code Section 66540) directs the Authority to increase regional mobility through the development and operation of a comprehensive water transit system and its associated landside facilities and adjunct services. During its efforts to develop a plan for enhanced ferry services for the Bay Area, the WTA considered a ferry service to Fort Mason as an extension of service from Berkeley to the San Francisco Ferry Terminal. That service is part of the current plan the WTA put forth for environmental review. The most recent draft (June 2003) of the WTA Program EIR for Expansion of Ferry Service on San Francisco Bay includes off-peak and weekend service to Fort Mason as part of the proposed project. The Golden Gate National Recreation Area (GGNRA) of the National Park

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Service (NPS) is developing a Water Shuttle Access Plan consistent with the long-term implementation strategy outlined in the GGNRA General Management Plan (GMP) (GGNRA 1980), and the former Congressionally-mandated Golden Gate Travel Study (GGNRA 1977). The goals of the Water Shuttle Access Plan include: 1) to maintain consistency with GGNRA and applicable regional, state and water transit plans; 2) to contribute to improving the Bay Area environment and preserve and protect the park's natural and cultural resources associated with accessing the park; 3) to enhance the quality of the visitor experience; 4) to increase opportunities for diverse visitor populations to access park sites; and 5) to provide cost-effective, reliable and safe water shuttle service. The FMC was identified as a terminal in the Final Ferry Shuttle Plan (off-peak and weekend service form the Ferry Building) and will be identified as a hub in the GGNRA Water Shuttle Plan.

Currently, the development of ferry service to FMC is in the planning stage. At this time, neither the WTA nor the GGNRA has the funding to implement such service and it is uncertain as to if and when the service would be implemented.

The San Francisco County Transportation Authority is currently seeking grant funds from the Coastal Conservancy to conduct the "Northern Waterfront Public Access and Bicycle Circulation Study" which would include the area between Fisherman's Wharf, specifically Hyde Street, and the Marina Green. The current alignment of the pathway, which connects Fisherman's Wharf with the Marina Green, crosses through Upper Fort Mason and the Great Meadow with significant grades. These grades are a concern both for the uphill climb they entail and for the high speeds of bicyclists on the downhill. Alternatives being considered are an alignment north of Fort Mason along the piers, an alignment through Upper Fort Mason, improvements to the existing alignment and the potential use of the existing railroad tunnel if it is not used for transit as planned. If the grant is funded, it is expected that the study will begin in January 2004.

3.0 EXISTING TRANSPORTATION DEMAND MANAGEMENT PRACTICES

Fort Mason Center has a well developed TDM program which is designed to accommodate parking demands of the broad range of events and activities without creating adverse parking and traffic impacts in the nearby Marina District residential areas. The Center has an on-staff Event Coordinator who is responsible for the ongoing administration of the TDM program. The Event Coordinator reports to the Director of Client Services and works closely with the Marketing and Sales Departments and event sponsors to plan and implement the appropriate TDM measures for each event. Costs, for the most part, are billed back to the event sponsor. The Fort Mason Foundation maintains a calendar of events and distributes a parking impact notice every six weeks to Fort Mason Center staff and resident groups. The parking impact report indicates the expected size of the event and the TDM measures which will be implemented to accommodate upcoming event. The Fort Mason Foundation also sends out reminder notices in the week prior to heavy impact days.

Currently, the FMF staff schedules events throughout the year. Days in which at least 100 people are expected to attend events are categorized as "activity days." It is important to note that certain visitor oriented venues such as the restaurants and the theaters operate virtually everyday of the year and that that activity day visitor activity is activity that occurs in addition to the visitors generated by these everyday venues. Days in which at least 1000 people are expected to attend events at the FMC are categorized as "high impact." Table 2 below presents information summarized from this calendar for the years 2001–2003. For the three-year period, the number of high impact days ranged from 46 to 67, or 13 to 18 percent of the

time. Activity at Fort Mason varies considerably from one year to the next, and appears to be influenced by the economy and the availability of competing venues.

Table 2 Annual Summary of Event Days and High Impact Days Fort Mason Center					
Year	Activity Days ¹	High Impact Days ²			
2001	188	67			
2002	85	46			
2003	161	58			

Activity Days - days in which at least 100 people are expected to attend events or performances at Fort Mason Center
 High Impact Days - days in which at least 1000 people are expected to attend events or performances at Fort Mason Center

Source: Fort Mason Center

On high parking impact days, there is the potential for parkers with destinations in the Fort Mason Center to choose to park in the Marina parking lots or on-street in the nearby residential neighborhoods. On weekdays this is very difficult as the areas are protected by a residential permit parking program limiting vehicles not displaying a residential permit parking sticker to two-hour parking. On weekends these permit restrictions do not apply; therefore parking in the residential areas is possible although parking is limited.

Depending on a number of variables such as the number and type of events, several parking management strategies may be employed to accommodate excess parking demand. These are valet parking in Fort Mason Center lots, reserved parking in FMC and adjacent lots and remote parking with shuttles. When deemed necessary by Fort Mason Foundation Staff or requested by the event sponsor, additional parking can be arranged. Necessity of parking controls is evaluated on an event-by-event basis and is determined by the following factors:

- Type and nature of the event
- Location and duration of the event
- By request of the event sponsor
- Need for US Park Police

- Expected Attendance
- Relationship to other planned events at Fort Mason Center and elsewhere in the general vicinity
- Past experience with this event or similar events
- Use of the lot to be reserved

If additional parking is considered necessary, the Fort Mason Center tries to contain the event within the FMC lot as much as possible to minimize the impact to the surrounding neighborhood. The following lots may be used for self-park, valet or reserved parking services.

- Fort Mason Center Lot E (shown as Area 1 on Figure 2) used most often with least impact to other FMC parking; excellent for self-park or valet and controlled with minimal staff.
- Fort Mason Center Lot E (shown as Areas 2 and 3) used together; works well for valet service.
- Lot between Building C and D (shown as Area 4) not used as often because it has the greatest impact to other parking areas; good for valet service.
- Gas House Cove 100 spaces immediately outside Fort Mason Gates, reserved through San Francisco Rec & Parks Department; only used for large events; reserving from 7am very disruptive to general parking in the area.
- Marina Green Lots approximately 650 spaces adjacent to Fort Mason Center; non-reservable but arrangements can be made to keep Harbormaster gates open for large events.

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- Marina Middle School largest and closest reservable off-site parking available; approximately 500 spaces; not available weekdays during school year until after 5pm; lot must be staffed by either school PTA or licensed parking service provider; usually used in conjunction with shuttle service.
- Presidio lots reserved by permit with the Presidio Trust; farthest from the Fort Mason Center and
 must be used in conjunction with shuttles and parking attendants; signage must be procured
 through Presidio Trust to direct cars to the designated lot; most costly to clients due to reservations
 fees and need for parking staff and shuttle service; generally used only for the largest events or for
 parking of oversized vehicles for an extended period.

The Center has identified four specific areas for valet parking, and depending on the event size, one or more of these areas is converted to valet parking (see Figure 2). In total these areas provide 230 self-park spaces or 335 valet spaces. Thus with the use of valet parking, the parking capacity of Fort Mason Center lots can be increased by 105 spaces to a total of 545 spaces.

In order to reserve these parking lots for use by FMC visitors, parking staff must 'guard' the area in question from 7am or earlier to prevent general parking. During the event, parking attendants are stationed at the Fort Mason Center entrance to direct visitors to the appropriate parking for their event. If the Fort Mason Center lot is full, FMF Client Services staff will provide fliers to parking attendants to redirect visitors to additional parking areas. The Fort Mason Foundation utilizes their own staff to manage the actual operations during an event and regularly employs a private parking operations firm when needed. For large events the Fort Mason Center has the option of requesting the assistance of United States Park Police officers to direct traffic, enforce parking restrictions and provide security.

Shuttle service and choice of provider is at the discretion of the event sponsor although the Fort Mason Foundation will make arrangements if necessary to the operation of the FMC parking as a whole. Shuttles are strongly encouraged as they relieve demand on the Fort Mason Center parking facilities and may be required when using off-site parking lots particularly the Marina High School and Presidio lots. Fort Mason Center staff will work closely with event sponsors and shuttle bus providers to insure that shuttle buses follow the strictly enforced vehicle size and routing restrictions on streets in the surrounding neighborhood.

The TDM program also includes special consideration for the parking of oversized vehicles for event staging. The Park Service has stipulated that up to 10 oversized vehicles can be staged overnight for up to five days in an area of the lot to cause the least impact to the Fort Mason Center residents and visitors. Special approval is needed for additional vehicles or a longer duration. Arrangements are sometimes made to park oversized vehicles at the Presidio. Shuttles used for parking lot access may be staged during the event duration but their engines must be kept off and they cannot park along the waterfront or near Greens' Restaurant kitchen windows.

Other TDM program measures include a commuter check program for FMF employees whereby they can receive pre-tax funds to be used for public transit. Fort Mason Center is currently negotiating with City Car Share to institute a car share location, called a pod, in close proximity to Fort Mason. The exact placement is still to be determined. Currently the closest pod is located in the Lombard Street Garage on Lombard between Fillmore and Webster Streets.

4.0 RECOMMENDATIONS

The current TDM program utilized by the Fort Mason Foundation is well developed and has proven effective in managing a broad range of visitor oriented activities and events. The following recommendations are intended to provide the Fort Mason Foundation with the tools necessary to enhance the existing transportation demand management (TDM) program. These recommendations focus on reducing traffic congestion and parking demand for employees of and visitors to Fort Mason Center. Consideration has been given to improving the operation of the existing transportation system as well as identifying opportunities to reduce demand by encouraging transit, bicycling and walking. These recommendations are categorized into four areas: traffic & parking, transit, bicycle & pedestrian and general operations. Each area includes recommendations applicable to both employees and visitors. Many of these recommendations are currently in place in some form or other; these programs should be continued and, wherever possible, expanded to attract greater participation by staff and the public.

4.1 Traffic and Parking

Carpooling - Reduce traffic and parking demand by encouraging carpooling by employees and staff. Provide incentives to carpool such as preferential carpool parking, or if paid parking is implemented, provide free carpool parking. In addition, the Fort Mason Foundation administration should continue the practice of posting RIDES information in the residents mail room and should encourage resident organization staff to participate in RIDES carpool matching service to form carpools between employees and staff of the various resident organizations.

Event-specific parking information - Currently, event parking information is provided at the front gate during an event. To reduce the additional travel time and congestion caused by visitors driving to the front gate to get parking information and/or driving around Fort Mason looking for parking, event-specific parking information could be made available prior to the event. This information can be distributed on the event website, through event flyers and advertising and/or provided with ticket purchase.

Parking directional signage - For events using remote parking areas, eliminate the need for visitors to drive to Fort Mason to find parking areas. Provide temporary signs along key access routes directing visitors to parking areas being used for the event. These signs could be located on Bay, Laguna and Buchanan Streets and on Marina Boulevard. Implementation of this program is outside the jurisdiction of the FMF and would require coordination by the San Francisco Department of Parking and Traffic (DPT) and support of the neighborhood.

Parking pricing – Both the FMF and the City Yacht Harbor have plans to impose parking pricing as a means of parking management and as a source of revenue. Because of the close proximity of the two parking lots it would not be practical or advisable to impose parking in one lot without pricing the other lot also. Otherwise, parkers would seek out the free parking lot first and avoid the pay lot. Also the pricing policies used for the two lots need to be reasonably consistent.

The imposition of parking fees at Fort Mason Center will have a positive impact on reducing parking demand as well as provide much needed revenue to make capital improvements and to maintain existing and implement new TDM programs. Before implementation of any parking fee program, employees should be educated on the alternatives available, such as carpooling, transit, bicycling and walking. Many of the measures discussed in this section would be appropriate to assist in identifying alternatives. The potential adverse affect of parking fees would be that some employees would attempt to park in the nearby residential areas in order to avoid the fees. During weekdays, when the residential permit parking restrictions are in force, this type of parking abuse would not be prevalent. On weekend days, some parking intrusion into the residential areas would be more likely.

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The imposition of parking fees would have a lesser effect on visitors to FMC. Fort Mason is one of only a few remaining visitor oriented venues in San Francisco that does not charge a parking fee. In general parking fees in the range of a \$1.00 per hour and \$4.00 to \$10.00 for event parking are very common, and would not alter the behavior of most parkers. The most likely group of parkers to be impacted would be persons who park at FMC for purposes other than visiting facilities or events at FMC. These include weekday commuters who park at FMC to board transit to reach their workplace in downtown San Francisco, and persons who park in the area to visit other nearby uses. This type of parking would be discouraged by parking fees.

Table 3 Summary of Parking Management Alternatives						
Parking Pricing Option	Pros	Cons				
Parking Meters	User fees based on time used; most suitable for short-term parkers	Not appropriate for long-term parkers; unattractive; require enforcement and coin collection				
Attendant at Exit Booth	Ability for visitors to pay only for time used	Requires attendant at booth; may result in long queues at exit disrupting lot circulation				
Time Limits-Machine dispenses time-stamped ticket where fee is paid; ticket is placed on dash	Can vary time limits; no attendant required	Requires enforcement and daily money collection; time available may not be adequate for activity attending; may pay for time not used				
Parking Fee Box-Parkers insert flat rate fee into slot that corresponds to parking space	No attendant required; no queues forming at exit or entrance	Requires enforcement and daily money collection; short-term parkers required to pay same fee as long-term; users must have exact change				
Central Pay Machine-Automated walk-up system that accepts coins/bills and dispenses magnetic card for vehicle exit	Users pay for time used; no queues forming at exit or entrance; no need for exact change; no attendant required	Requires daily money collection; need on-site staff to handle malfunctions; can be complicated for some users				
Valet Parking	Currently in use for some events; can park more vehicles than self-parking	Requires staff; long waits for car may occur at some times				
Pay Attendant on Entry - Flat fee for events only	No parking equipment needed; fees charged only when major events occur	Difficult to control revenue; regular visitors and staff may find it confusing as to when fees are collected				

There are many different methods for assessing and collecting parking fees. In Table 3 above, parking pricing alternatives are listed with discussion of the pros and cons of their use at Fort Mason Center. Because of the variety of uses and activities occurring at Fort Mason Center, consideration should be given to selecting the option or options that are most appropriate. For example, parking fees can be charged on an hourly, per event or daily basis. For the visitor attending a performance in one of the theaters or participating in the day-long whale watching trip, a daily or per event fee would be appropriate. However, this same fee would be inappropriate for the visitor making a quick stop at a bookstore or gallery. Conversely, parking fees imposed on an hourly basis with the use of parking meters would be suitable for

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short-term visitors but would be inconvenient for those visiting for many hours. In addition, the installation of parking meters would detract from the historical and aesthetic ambiance of Fort Mason.

Perhaps the most flexible method for implementing parking fees at the Fort Mason Lot would be by installing automated entry and exit gates with a cashier booth in the gatehouse area to control all of the parking. Parking for employees could be controlled through the use of card keys to allow automatic entry and exit for a monthly fee. All others would be charged for parking on an hourly basis or on a per event fee basis. Payment would be collected on exiting the parking area. When major events are scheduled, fees could be collected on entry to avoid long queues of cars forming at the exit gates. Of course, this would require the use of a parking attendant; on days when parking demand is low, this might not be a cost-effective option. As an alternative, a parking kiosk could be used located in a central location at Fort Mason Center. On arriving, the visitor would take a time-stamped ticket from the entry control gate. Before leaving, the visitor would take their ticket to the parking kiosk, pay the fee and then use the validated ticket to pass through the exit control gate. This method would reduce long queues of cars at the exit gate; the parking kiosk could also double as a visitor bureau with information about activities at Fort Mason Center and other nearby visitor destinations, transit, bicycle facilities, and taxi service.

4.2 Transit

Incentives to use transit for employees/staff - Continue to encourage transit use through the commuter check program. Expand the program through participation of resident organizations. In addition, institute a guaranteed-ride-home program in the case of employee sickness or family emergency.

Incentives for visitors to use transit - Encourage the use of transit by visitors to Fort Mason Center by offering a discount to the event entry fee with valid bus transfer. Provide more detailed transit information on the Fort Mason and event websites including the location of bus stops and bus frequency for each route in proximity to Fort Mason. Event-specific advertising should encourage the use of transit, bicycling and walking.

Transit information at Fort Mason Center - Provide bus route maps, including the location of bus stops, and schedule information at a central information kiosk in Fort Mason Center. Post phone numbers for taxi service. In addition, bicycle facility maps could be included.

4.3 BICYCLE AND PEDESTRIAN

Incentives for employees/staff - Encourage bicycling and/or walking by employees and staff by providing a monetary or other incentive.

Bicycle Parking - Encourage visitors to bicycle to large events by providing bicycle valet parking. Valet parking should be provided at no cost and its use may include a discounted entry fee.

Improved pedestrian and bicycle circulation - Redesign Fort Mason Center roadways and parking area to provide clear and safe pedestrian paths especially across entry/exit traffic at the Gate House and through the bus turnaround. Incorporate speed humps, speed tables, raised crosswalks, special paving materials or other devices to reduce auto speed and clearly identify pedestrian walkways. Continue to support efforts to improve bicycle and pedestrian access in the surrounding neighborhood especially with participation in the "Northern Waterfront Public Access and Bicycle Circulation Study". In this study, encourage consideration of improvements to the connection between the Fisherman's Wharf trail and Fort Mason Center entrance and pedestrian/bicycle access from the Marina Green.

4.4 GENERAL OPERATIONS

TDM Committee - Form a TDM committee to meet approximately every 3 months to evaluate TDM operations and handle new traffic and parking issues. The committee should include the Fort Mason Foundation Transportation Coordinator and representatives from the Yacht Harbor/Marina, City, neighborhood associations, and GGNRA/NPS. A representative from the Presidio Trust should be included as an adjunct to this committee when use of remote parking in Presidio lots is being considered. This committee would review the performance of the TDM program, explore and coordinate improvements to the program and other transportation improvements, and coordinate plans for upcoming events.

Travel data - Update visitor mode split, trip origin and parking occupancy data to better understand the traffic and parking demands generated by the Fort Mason Center and identify appropriate TDM measures. This study, similar to the "Fort Mason Transportation Study" prepared in 1995, should be updated every three-four years.

Off-site wayfinding signage - Assist visitors traveling to Fort Mason Center by car, walking, bicycling and transit with directional signage on surrounding roadways. Include signage along routes connecting Fort Mason with nearby transit stops and bicycle facilities on Bay and Octavia Streets. This program is outside the jurisdiction of Fort Mason Foundation and would require the cooperation of San Francisco DPT and support of surrounding neighborhoods.

Circulation and parking lot improvements - Implement the newly designed signage program. Increase lighting in the parking lot area for better visibility and safety at night. Repaint parking, crosswalk and directional pavement markings to improve visibility, especially at night. Clearly identify loading zones on pavilion aprons and front blacktop areas to discourage illegal parking in these areas. Repaint parking islands so they are clearly visible at night. Apply reflective paint or other material to make bollards along Building A more visible at night.

Long-Term Transportation Improvements -Currently, the Fort Mason Foundation is an active participant and leader in all long-term transportation improvements under consideration that affect the Center. The FMF chairs a working group focused on the E/F-Line extension to Fort Mason and has actively participated in the planning and development of water transit and bicycle/pedestrian planning and enhancements. Fort Mason Foundation should continue to participate in and support future studies of transit and bicycle/pedestrian access improvements which will reduce existing demands for parking and vehicle access. Fort Mason Foundation should give particular consideration to the extension of the MUNI Historic Trolley, implementation of ferry service to Fort Mason and/or improvements to bicycle and pedestrian access from Aquatic Park.



Appendix E



PIER 2
ENVIRONMENTAL
ASSESSMENT
MITIGATION
MEASURES

Pier 2 EA Mitigation Measures

The following mitigation measures were included in the Pier 2 EA and FONSI. These mitigation measures may be applicable to certain activities made more feasible by the Fort Mason Center Longterm Lease, particularly those activities involving construction.

Air Quality

Cover all trucks hauling soil, sand and other loose materials, or require all haul trucks to maintain at least two feet of freeboard. Sweep all paved surfaces at the project construction site daily with water sweepers; this mitigation shall be required during dust-creating operations and in locations/routes where dust would be generated as a result of project construction. Surface debris shall not be swept into the bay. With the exception of concrete trucks, all trucks in queue or receiving or delivering loads shall not idle for more than five minutes. In addition, engines used to propel barges shall be run only when necessary to operate the barges. The general contractor and all subcontractors shall register all applicable powered construction equipment under the Statewide Portable Equipment Registration Program, administered by the California Air Resources Board.

- Training for site personnel on the proper handling, spill prevention, and emergency spill response;
- Material Safety Data Sheets (MSDS) for each chemical to be kept on site, and construction employees to be aware of their location and content;
- Placement of catch pans beneath equipment and hose connections during fueling;
- Daily inspections of all fuel and hazardous materials storage areas;
- Daily cleanup of the job site to ensure fuel and hazardous materials are properly stored or disposed of; and

A site-specific construction noise control plan shall be prepared prior to the commencement of construction activity. The plan shall evaluate construction noise levels at the sensitive receptor locations based on the time and duration of specific activities and the specific equipment that would be used by the contractor. The attenuating effects of intervening structures should be considered. The plan shall identify specific noise control measures that could reduce the noise level of affected receptors. The contractor shall consider implementation of the following measures in the construction noise control plan:

- Select equipment capable of performing the necessary tasks with the lowest sound level and the lowest acoustic height possible.
- Operate and maintain construction equipment to minimize noise generation.
 Equipment and vehicles will be kept in good repair and fitted with
 "manufacturer-recommended" mufflers.
- Provide enclosures for noise-producing stationary sources such as generators.
- Noise barriers are typically used to control noise from construction. A barrier must have sufficient mass to attenuate the low frequency component of the construction equipment. The barrier must be high enough to block the line-of-sight between the noise source and the receptor. Depending on the construction methodology, a barrier could be placed in the near field(close to the noise source)or in the far field (close to the receptor). The plan should identify the proper height, location, and effectiveness of a noise barrier.
- In addition to a noise barrier, boarding up the windows at the FMC Landmark Buildings with heavy plywood and sealing the edges may provide up to 15 dBA of noise reduction.

Hazardous Materials

To reduce the potential for water quality impacts from accidental spills, all equipment fueling activities shall be conducted at least 50 feet from the water's edge, and proper containment for accidental spills, such as oil absorbent pads and booms, shall be readily available on site during construction.

Equipment operators shall develop procedures for use of the equipment, and measures to control construction storm water pollution. No construction debris or other liquid or solid waste (e.g., trash) shall be allowed to enter bay waters. Operational procedures to minimize the potential for spills will include the following:

- Training for site personnel on the proper handling, spill prevention, and emergency spill response;
- Material Safety Data Sheets (MSDS) for each chemical to be kept on site, and construction employees to be aware of their location and content;
- Placement of catch pans beneath equipment and hose connections during fueling;
- Daily inspections of all fuel and hazardous materials storage areas;
- Daily cleanup of the job site to ensure fuel and hazardous materials are properly stored or disposed of; and
- Maintenance of spill cleanup supplies on site (such as absorbents, shovels, and containers).

Any spills will be cleaned immediately and a log of spills and cleanup actions will be maintained. In the event of a spill that could potentially cause impacts to the bay waters, the National Park Service, San Francisco RWQCB, California Department of Fish and Game, California Office of Spill Prevention and Response, U.S. Coast Guard, and U.S. EPA will be notified as required by California Oil Spill Response Act (OSPR). Emergency telephone numbers shall be maintained on site for these agencies.