

**FINDING OF NO SIGNIFICANT IMPACT**  
**TEMPORARY RELOCATION OF CRISSY FIELD CENTER PROJECT**

National Park Service, U.S. Department of the Interior

Golden Gate National Recreation Area

June 2009

**INTRODUCTION**

This Finding of No Significant Impact (FONSI) has been prepared for the Temporary Relocation of Crissy Field Center Project, in accordance with the National Environmental Policy Act (NEPA). The project area is located south of the East Beach parking area, north of the intersection of Marina Blvd and Mason Street at Crissy Field, Area A of the Presidio. As part of NPS's informed decision on this project, the NPS carefully considered the impacts, both adverse and beneficial, documented in the Doyle Drive EIS/EIR (September 2008) and the June 2009 Crissy Field Center Temporary Relocation Reevaluation (23CFR771.129). These documents are hereby adopted, and form the impact assessment for this FONSI. This FONSI approves this federal action to be implemented on National Park Service property. The NPS will issue a Special Use Permit authorizing the Golden Gate National Parks Conservancy to implement this project on NPS land.

**PURPOSE AND NEED**

The purpose of the project is to relocate the CFC to temporary facilities during the Doyle Drive construction project being implemented by the California Department of Transportation (Caltrans).

The project is needed in order to avoid severe impacts that would occur to CFC programs as a result of the construction of the Doyle Drive replacement. The 2008 *Doyle Drive Replacement Project Final Environmental Impact Statement/Environmental Impact Report* (Doyle Drive EIS/EIR) describes the impacts that will occur at the Presidio of San Francisco during construction of the replacement roadway. The mitigation in the EIS/EIR for impacts to the CFC provides for it to be relocated during the construction.

The existing elevated section of Doyle Drive adjacent to the CFC will be demolished and replaced by a new roadway that will be constructed as a covered parkway. A long-term at-grade detour will be constructed through the area to accommodate traffic during the replacement construction. The proximity of the CFC building to the demolition and construction, as well as the at-grade detour, compels the CFC to relocate its programs, activities, and visitor services. The CFC will be displaced until the Doyle Drive replacement project is finished, potentially up to 5 years. At the conclusion of the construction, the CFC would return to this location.

**ALTERNATIVES CONSIDERED**

During the evaluation of alternatives, the following criteria were considered:

1. Whether the alternative would meet CFC program needs, including ready access to Crissy Field and Crissy Marsh and their environmental resources.
2. Whether the facility to be used by the CFC would meet applicable codes and regulations, and do so in a timely manner, given the need to vacate the current CFC facility by September 2009.

3. Whether there were any significant impacts that could result from implementing any alternative, thereby requiring an Environmental Impact Statement (EIS) to be prepared.
4. Whether and to what degree public health and safety would be affected.
5. Whether any alternative had associated with it any unique site characteristics that could be adversely affected, such as historic or cultural resources, shoreline access, critical ecological areas, or wetlands.
6. Whether any of the impacts from the proposed project would be highly controversial.

## **ALTERNATIVES**

**Alternative A: Take no action.** The “no action” alternative would leave the CFC at its present location. The facility would either close or suffer the impacts from the Doyle Drive project. Remaining open at the present location was not a viable option, as the relocation of the CFC has been identified in the adopted Doyle Drive EIR/EIS as a mitigation measure for impacts to the CFC. The CFC must move from its current quarters to avoid direct and indirect impacts during the construction.

Other alternatives considered included temporarily occupying a new structure or temporarily occupying an existing structure.

**Alternative B: Locate temporary new facilities at the east end of the East Beach parking area.** The relocation of the CFC is temporary; therefore, the facilities can be temporary as well, so long as they meet all applicable access, safety, and school-use standards. The only ‘ready-to-go’ option that satisfied all criteria is the use of newly constructed temporary modular units installed at a vacant site. In looking at temporary relocation site options, it was determined that the East Beach site would maintain access to outdoor environmental teaching resources, be minimally intrusive on existing activities at Crissy Field, and would allow quick deployment of temporary buildings meeting classroom standards.

**Alternative C: Use an existing building.** Existing buildings in the Presidio were surveyed for availability of space, appropriate location, and level of improvements needed. Spaces available in renovated buildings were limited in size and more suitable for office than classroom and community use. Many of the empty buildings on the Presidio are programmed for other uses or are close to the Doyle Drive construction. Most vacant buildings are that way because they require extensive rehabilitation, seismic retrofits, and clean-up before they can be occupied. It would be difficult or infeasible to make the necessary renovations to an existing building by September 2009, and such renovations would be a costly investment for a temporary relocation. Based on the need to meet rigorous standards for classroom safety and accessibility, it was determined that no structures on the Presidio could be renovated to acceptable standards within the time and budget available.

Buildings and sites at the west end of Crissy Field were considered, but there was concern about introducing an additional use to an area that has become more congested and busy with ongoing leasing of West Crissy buildings. West Crissy is also further west on Mason Street, which will be adversely affected by construction traffic, the closure of Halleck Street, and utility work.

Another important consideration with regard to location was the proximity of the CFC to the outdoor resources it has incorporated into many programs. CFC has an established environmental education curriculum that makes use of Crissy Field resources, particularly the marsh. Therefore, remaining near

or on Crissy Field for ready access to resources was an important criterion to the CFC. This would maintain the ability to continue programs. Any site south of Doyle Drive would have circuitous access to Crissy Field because of the planned closure of Halleck Street for most of the Doyle Drive construction.

### **SELECTED ALTERNATIVE**

The National Park Service has selected for implementation Alternative B: Locate temporary facilities at the east end of the East Beach parking area. No changes were made to the preferred alternative as a result of public comment; however, the NPS has made a minor change to the selected alternative as noted below.

After a comprehensive search for a suitable building or location meeting the alternative selection criteria, a site was identified at the East Beach area of Crissy Field as being best suited to meet the needs of the CFC, while having minimal environmental impact. This site allows the CFC to continue using the natural and cultural resources of the park, especially the outdoor areas of Crissy Field, in its community-based environmental programs that serve youth, schools, and community organizations. The East Beach location has been the site of many previous developed uses, including the 1915 Panama-Pacific International Exposition, numerous U.S. Army buildings, and now artificial landforms and an overflow parking lot.

The temporary facility will consist of four modular units assembled into a single integrated structure. The facility will be oriented on a northeast-southwest axis, facing the Bay at a 45 degree angle to the East Beach parking lot. The one-story facility will be approximately 20 feet high at its highest point and will provide approximately 7,200 square feet of interior space (as compared to 11,500 sq. ft at the current location). It will include classrooms, staff offices, a multipurpose room, a snack bar, and a visitor information area. Site improvements will include accessible walks, a paved entry area, and a fenced outdoor activity space for classes. A paved path between the CFC and the existing restroom facility at the west end of the East Beach parking area will be installed along, but separated from, the existing east-west driveway within the parking area. Construction of the temporary CFC facility is planned for July-September 2009.

The nearest corner of the temporary CFC building is about 90 feet from a row of mature trees at the Presidio's eastern boundary. At its nearest point, the site is 250 feet north of Mason Street and 250 feet south of the Bay shoreline. The footprint of the facility and its associated exterior spaces will occupy a portion of the existing turf-covered overflow parking area and the site of an existing landscape berm, which will be re-graded to accommodate the building. A second berm, between the building and the Presidio boundary, will remain and a row of mature trees along the boundary will not be affected.

The modular units are designed for maximum energy efficiency and will meet standards for LEED certification, with a LEED Silver level expected. They will be fully ADA accessible and be pre-approved by the State of California for school use.

Certain alternative energy-related elements are being considered for inclusion in the project, but currently are not funded. However, for the purpose of environmental review, it was assumed that they all will be part of the project. These are included under this FONSI, but may not be implemented. Non-implementation of these will not adversely affect the site or the project. These optional components

include three rooftop elements: a solar-heated hot water system; a photovoltaic collection system; and a vegetated "living roof." Consideration is being given to installing up to five pole-mounted helical wind turbines in front of the building. These energy-related elements would contribute to the efficiency of the building and would support the CFC mission to educate youth and the community on sustainable living.

Initially, the proposed project was to have all utilities to the site installed underground adjacent to an existing crushed stone path trending northeast from Mason Street to the site. The NPS has revised the utility plan to have the utility trenches run parallel to but approximately 20 feet inside the park boundary, leading directly north from their hook-ups on Mason Street. This change was determined to have impacts no different than the original route, and to be somewhat shorter in length. After installation, trenches will be backfilled and the surface restored. Utilities to the building include electric, telephone, sanitary sewer, domestic and fire protection water, and possibly natural gas.

Earthwork for the project will be limited to grading to level the building site for construction of the slab foundation for the temporary units and the forecourt area and trenching to install utilities. Three or four trees from the cypress grove planted in 2000 may be removed to accommodate the modular units; these trees will be replaced upon removal of the temporary facility in the future. An area in front of the facility will be paved in concrete and crushed compacted stone to provide access and an assembly/sitting area. Landscaping with native plants will be incorporated into the design. This forecourt area will be similar in function to the plaza in front of the current CFC building. The facility and its approaches will be designed to provide access for visitors with disabilities. An existing driveway within the East Beach parking area will provide vehicular access and drop-off to the facility.

Approximately 9,200 square feet of the turf-covered overflow parking area will be occupied by the facility and forecourt area. In addition to the turf overflow parking, the design will require the loss of about six paved parking spaces in order to provide appropriate access between the paved parking and the building. The CFC building and forecourt will displace space currently available for approximately 30 vehicles in the overflow and paved parking.

When the existing Crissy Field Center building on Mason Street is ready to be reoccupied, the CFC will return. At that time, the temporary facility at East Beach will be removed and the landscape at the site restored to its pre-construction condition.

#### **OTHER PROJECT ELEMENTS**

No impacts of significance were identified as a consequence of implementing the proposed project. However, to address specific issues and concerns, the following elements have been added to the project. These include:

1. Fencing to separate from general use an outdoor activity area for use by CFC programs at the rear of the facility.
2. Provision of American with Disabilities Act (ADA) compliant access from the existing paved parking lot to the facility, and re-striping and signing of paved parking at the foot of the access ramp to indicate it is reserved for handicapped parking.

3. Provision of a hard-surfaced pathway between the CFC facility and an existing restroom. The pathway will be separated from an adjacent driveway to ensure safety.
4. Use of a slab foundation on or above existing grade to preclude the possibility of disrupting any cultural artifacts that might be located within the area covered by the foundation.
5. Exclusion fencing, erosion and runoff control, signage, covering of open trenches during non-work hours, and other applicable environmental and public safety protection during construction.
6. Monitoring of the utility trench during excavation for any cultural resources that might be revealed.

#### **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

The NPS has determined that the environmentally preferred alternative for this project is Alternative B. The environmental preferred alternative is the alternative that will promote the nation environmental policy expressed in NEPA. The environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment. Although Alternative C could have used an existing historic building, a historic building could not have been renovated, within the given timeline or budget, to meet the same LEED standards that the selected alternative will achieve. The modular units are designed for maximum energy efficiency and will meet standards for LEED certification, with a LEED Silver level expected.

#### **PUBLIC INVOLVEMENT**

The NPS has undertaken extensive outreach to inform the public and potentially interested parties about the proposed temporary relocation. The NPS outreach process has included the following:

- **Public Open House Events:** Park staff was available to explain the CFC Temporary relocation project, answer questions, and take comments at two open houses in May 2009.
- **Stakeholder Meetings:** In early May 2009, park staff met and spoke with representatives of several stakeholder groups including San Francisco Boardsailing Association, Neighborhood Associations for Presidio Planning, People for Golden Gate National Recreation Area, and Crissy Field Dog to discuss the temporary relocation project and address potential concerns.
- **NPS Interpretative Park Rangers** were on-site on the promenade at East Beach (May 17th) and outside the Crissy Field Center (May 18th). Informational handouts including project details and the website for public comment were offered.
- **Letters** were sent to CFC Program Partners informing them of the proposed temporary relocation plan. The list included 72 leaders of local community groups, educational institutions, and nonprofit organizations who collaborate with the Crissy Field Center in programming.
- **Gateways**, a quarterly newsletter sent to the 14,000 members of the Golden Gate National Parks Conservancy, featured an article on the proposed CFC temporary relocation in the summer 2009 issue mailed in early May.
- **Park E-ventures**, the Conservancy's monthly newsletter emailed to 22,000 subscribers (18,000 non-members and 4,000 members), included an article on the proposed CFC temporary relocation in the May 2009 issue.
- **Postcards** announcing the proposed temporary relocation project, impact analysis and public comment period were sent to 4,000 individuals on the NPS mailing list on May 29.

- **Informational Handouts** were placed inside the Crissy Field Center and Warming Hut for visitors to pick up beginning on May 15.
- **Websites:** Descriptions, project details and opportunities to comment were posted on the following websites:
  - NPS Planning, Environment and Public Comment <http://parkplanning.nps.gov>)
  - Golden Gate National Parks Conservancy ([www.parksconservancy.org](http://www.parksconservancy.org))
  - Crissy Field Center ([www.crissyfield.org](http://www.crissyfield.org))
- **News Release** was distributed on May 14 to media contacts at 40 local print and broadcast outlets and to contacts at eight ethnic media outlets.
- **Park Staff Education & Training:** Park staff who interact with the public at the CFC and Warming Hut has been provided with background information on the proposed temporary relocation to help address and direct public questions to the appropriate contacts.
- **Two Comment Periods:** Two comment periods were provided. Scoping was conducted from May 14 to May 29, 2009. A second comment period from June 1 to June 12, 2009 afforded an opportunity for the public to review and comment on the impact assessment.
- **Construction Information:** During construction, informational signs describing the project and its purpose will be posted at the site.

## COMMENTS AND RESPONSES

Eleven comments were received, four during the first comment period and seven during the second comment period. The first four comments were addressed in the impact assessment released at the beginning of the second comment period. None of these required revision of the assessment or of its conclusions. These comments expressed concerns over visual, traffic, and parking impacts of the project at East Beach and in the vicinity, whether the facility was genuinely temporary, whether there had been adequate involvement of the community, and whether using an existing building would not be a better alternative. Other comments not specific to the CFC relocation, as such, included suggestions for interpretive displays at the CFC, for a 'dog safety/protecting the environment' program in cooperation with the SPCA, and for information on how detour and road closure information will be made available to the public during the Doyle Drive construction project, and expressed concern that the Doyle Drive project would limit the options of dog walkers and other park visitors and cause increased use of other recreation locations.

Seven comments were received during the second comment period. Concerns were expressed over how the project may affect City-owned parking in the vicinity of the San Francisco Yacht Club, why an existing building at the Presidio was not used, and whether the CFC facility would be genuinely temporary. One comment suggested various environmental strategies such as use of native plants and permeable paths, and provision of sufficient rest rooms. Three of the seven comments questioned the wisdom of the Doyle Drive construction project itself, and did not comment on the CFC relocation project.

Information in the impact assessment prepared by NPS is sufficient to answer each of the comments related to the relocation project. The first four comments were addressed specifically in the assessment document, including references to specific sections of the text. Where they pertained to the project itself, the subsequent seven comments were on matters that were expressed in the earlier

comments and are addressed in the responses to the earlier comments or are addressed in the pertinent analyses in the assessment.

After review of the project and the analysis in light of the comments received, it was determined by NPS that adequate information was included to address the comments and that no changes were required to the assessment or to the project.

#### **AGENCY CONSULTATION**

*Wetlands.* There are no wetlands on or near the site. No consultation with the US Army Corps of Engineers or other agencies with regard to wetlands was required or conducted.

*National Historic Preservation Act (Section 106).* Consultation was undertaken with the State Historic Preservation Office (SHPO) and contact was made with representatives of the Ohlone community, which represents Native American interests in this area. No issues were identified during this consultation and no special protective or data recovery measures were recommended. Sample trenching by cultural resource experts has occurred along the utility corridor. No resources were identified. The project was determined to have “no adverse affect” and is certified under Caltrans programmatic agreement with the California State Historic Preservation Office.

*Endangered Species Act (Section 7).* The project site is not within or adjacent to habitat for any endangered species. No endangered species will be harmed or disturbed by Implementation of the project, which is located in an existing turf-covered parking area on a grass covered berm. No consultation with the US Fish and Wildlife or the National Marine Fisheries Service was required or conducted.

*Bay Conservation and Development Commission.* Federal project must receive a determination from the state agency responsible for the state’s coastal zone plan that the project would be consistent with the plan. In San Francisco Bay, the Bay Conservation and Development Commission (BCDC) administers the San Francisco Bay Plan (Bay Plan) and issues Consistency Determinations. The entire Presidio is included in the Bay Plan as a ‘park priority use area’ and the proposed action therefore requires a consistency determination. Through discussions with BCDC, they determined that an application should be made for an amendment to the existing consistency determination applicable to the site area: CN 6-98

*Consistency Determination Crissy Field and Crissy Field Marsh.* The amendment to CN 6-98 would determine that the temporary relocation of the Crissy Field Center (CFC) to the East Beach area of Crissy Field is consistent with BCDC’s adopted coastal zone plan. The request for this determination and information in support of the request were provided to BCDC by email on June 5, 2009, followed by a mailed copy. The final consistency determination amendment is pending. The project will comply with any conditions imposed by BCDC.

*Caltrans coordination:* The NPS is coordinating with Caltrans on the CFC project. Caltrans has prepared a re-evaluation document for the relocation because the specific relocation site was not known at the time the Doyle Drive EIS/EIR was prepared and adopted. The Re-evaluation concludes that there are no significant impacts associated with relocating to the East Beach site.

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

The NPS used the following NEPA criteria and factors defined in 40 CFR §1508.27 to evaluate whether the Selected Alternative would have a significant impact on the environment.

*Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.*

Whether taken individually or as a whole, the impacts of the project do not reach the level of significance requiring an EIS. Most adverse impacts would be temporary and occur during construction. Impacts associated with construction, such as noise impacts to residences, would during daylight hours on weekdays and would be less than significant because of the distance between the site and residences. A four-lane road, Marina Boulevard, stands between the project site and the nearest residences and establishes the ambient noise condition at the residences. Best management practices are incorporated into the project to ensure any adverse impacts from earthwork would be less than significant. The earthwork would occur during the dry summer season.

During operations, the Selected Alternative would have neutral to minor impacts. Minor impacts would occur with regard to parking and traffic and visibility of the project. The project would be neutral with regard to the need for utilities and services, impacts to special status species, and effects on soils, wetlands, wildlife, and plants.

*Degree of effect on Public Health or Safety.*

As compared to its current location, which will be adjacent to a major roadway construction project, the project site is beneficial with regard to public health and safety. In addition, the project facility will be built to modern fire and life safety standards.

*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 project site does not contain prime farmland, farmland of local or statewide importance, wetlands, wild and scenic rivers, or ecologically critical areas. The site is flat and has been heavily disturbed and filled in the past. It is currently an overflow parking area covered in reinforced turf. It is within parkland and in proximity to historic and cultural resources. However, the integrity of the resources is unaffected and the impact on parkland is minor, as the project would remove some parking available to park visitors.

*Degree to which effects on the quality of the human environment are likely to be highly controversial.*

The project has not generated public controversy and is not likely to be controversial. Public comments received were concerned principally with parking and traffic or were supportive of the project.

*Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.*

No conditions were identified in the existing setting or as a result of project implementation that would result in uncertain or unique or unknown risks. The site is flat and currently used as a turf-covered

overflow parking area that was filled during previous site renovations associated with Crissy Field. The facilities and the construction of the facilities involve typical construction techniques. The operation will be educational in nature.

*Degree to which the action will establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

The project is temporary in nature and will be removed in approximately five years. It is unrelated to any other NPS plans for the Presidio or Crissy Field, and is a beneficial undertaking to avoid impacts that will occur at the CFC's permanent location. Therefore, it is not precedent setting. In the event of the need for future temporary locations for facilities and programs, these would be considered in the context of the need for the relocation and existing conditions. These would receive a separate and independent environmental analysis. The project does not represent a decision in principle about a future consideration.

*Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

The Selected Alternative moves an existing program to a temporary location. It does not increase the use of the program or facility above the current level at the existing location. The action is related to the replacement of an existing highway, and is a mitigation measure to avoid environmental impacts to the CFC and its programs that would occur if the CFC operation remained at its current location. The proposed action would not contribute to a cumulative impact.

*Degree to which the action may adversely affect districts, sites, highways, structures, or object listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

The assessment of the project did not reveal any adverse affect on districts, sites, highways, structures, or National Register of Historic Places listed objects. There are no significant scientific, cultural, or historical resources affected by the project. The project would have a beneficial impact on the scientific education of youth through the ongoing programs of the CFC.

*Degree to which the action may adversely affect an endangered or threatened species or its critical habitat.*

The project would be located at a site that is maintained turf. There are no known endangered or threatened species or critical habitat at or near the site. The project site and vicinity are used moderately-to-heavily for parking and recreation, depending on the day and season.

*Whether the action threatens a violation of Federal, state or local environmental protection law.*

Implementing the Selected Alternative would violate no Federal, state or local environmental protections 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. None were identified that were applicable to the project or the site.

## **MITIGATION**

No impacts were identified that will require mitigation.

#### **IMPAIRMENT**

The adopted impact assessment prepared for this project is summarized in this FONSI. Based on the analysis in that document, it has been determined that impacts from the selected alternative to be implemented will not impair park resources or values and will not violate the National Parks Service Organic Act

#### **CONCLUSION**

As a result of comments received by NPS on the environmental document, no changes are made to the Crissy Field Center Temporary Relocation Impact Assessment or to the project.

The selected alternative is not an NPS project or similar to an NPS project that normally requires an EIS, nor has in the past required an EIS, nor is it without precedence in the NPS. Displacement to temporary facilities of activities and functions situated near major construction (such as the Doyle Drive reconstruction) is common. This is done to avoid impacts associated with physical disturbance, visitor safety, and facility accessibility.

Implementation of the Selected Alternative will not have significant impacts on the human environment. This determination is sustained by the impact assessment of the project by NPS, by information in the Doyle Drive EIS/EIR, and by information in the Caltrans Reevaluation document. Public review comments revealed no issues relevant to the project that had not already been considered in the NPS analysis. There are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The GGNRA will implement the Selected Alternative, relocation of the CFC to East Beach, as soon as practical.

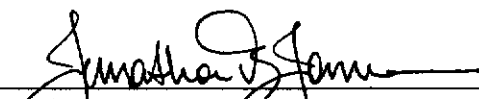
Recommended:

  
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Superintendent

Golden Gate National Recreation Area, Nation Park Service

6-17-09  
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Date

Approved:

  
\_\_\_\_\_  
Jonathan B. Jarvis, Regional Director  
Pacific West Region, Nation Park Service

6/22/09  
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Date