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United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO

L76 (GOGA-RMPPC)

OCT 02 1996

Dear Reviewer:

Enclosed is a copy of the Crissy Field Plan Staff Report and Finding of No Significant Impact (FONSI). The FONSI completes the environmental review process for this project.

We would like to thank you for your participation in this process and acknowledge the contributions of the public, and other agencies and organizations in helping to shape this plan to reflect both the needs of the community as well as the broader objectives of the Presidio General Management Plan Amendment. The Crissy Field Plan creates a vision that strikes a balance between recreational, ecological and cultural resource enhancements while accomodating the current users of the site and retaining its wild and open character.

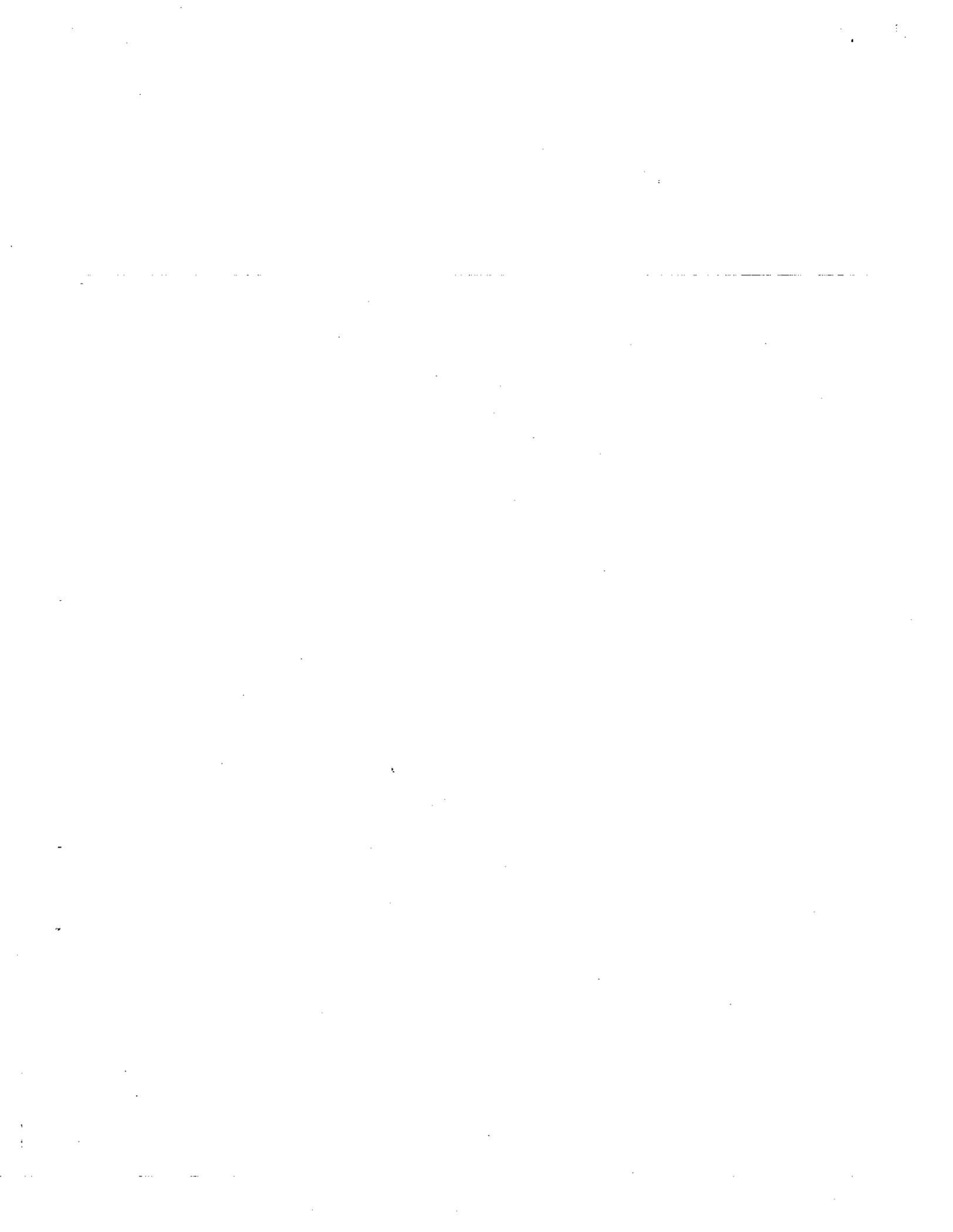
If you have questions about this document or the environmental review process, please contact Park Planner Nancy Hornor at (415) 556-4137.

Sincerely,

Brian O'Neill
General Superintendent

Robert Chandler
General Manager, Presidio Project

cc: GGNRA Advisory Commission



FINDING OF NO SIGNIFICANT IMPACT CRISSY FIELD PLAN

This Finding of No Significant Impact (FONSI) has been prepared for implementation of the National Park Service's (NPS) proposed Crissy Field Plan at the Presidio of San Francisco in the Golden Gate National Recreation Area (GGNRA).

The FONSI is based on the analysis of impacts associated with development of Crissy Field discussed in the Crissy Field Environmental Assessment (EA), dated June 1996, and input received during the public scoping and comment periods. Comments received during the public review period for the EA are summarized and responded to in a Staff Report, dated September 1996. The EA, Staff Report and the Presidio General Management Plan Final EIS, which the Crissy Field EA tiers off of, are incorporated by reference, as supporting documents for this FONSI.

PROPOSED ACTION

The NPS proposes to develop an approximately 100 acre portion of Crissy Field, generally including the site from Mason Street north to the shoreline of San Francisco Bay, consistent with the planning area concept described for Crissy Field in the approved Presidio General Management Plan Amendment (GMPA).

The proposal includes improvements to the Golden Gate Promenade and Mason Street, coastal dune restoration; restoration of the 1920's historic grass airfield; visitor amenities such as picnic facilities, parking, trails, overlooks, restrooms, and rigging areas for boardsailing equipment; removal of rubble on the beach; improvement of shoreline protection; and construction of a 20 acre tidal marsh.

Improvements to the Mason Street/Marina Boulevard intersection, implementation of a water shuttle dock at the Coast Guard Station, changes to traffic on Crissy Field Avenue, use of the historic hangar buildings, and other improvements south of Mason Street which are identified in the GMPA are outside of the scope of this action. They are functionally independent of this proposal and their future implementation would not be precluded by this action.

PUBLIC REVIEW

The proposed action was presented at the June 19, 1996 meeting of the GGNRA Advisory Commission. A 45 day public review period ended on August 15, 1996. Verbal comments were received at the July 17, 1996 Advisory Commission meeting. More than 290 written and verbal comments were received and were evaluated and responded to in a Staff Report, which was presented at the September 18, 1996 meeting of the GGNRA Advisory Commission.

In a unanimous vote, the Advisory Commission recommended approval of the proposed action

and completion of a FONSI. A summary of the comments and responses is included in the Staff Report.

ALTERNATIVES

The EA considered a Dune Alternative and a No Action Alternative. The dune alternative includes a stabilized dune field on the central portion of the site instead of a tidal marsh. The EA also included discussion of several alternatives which were considered but rejected, through the public scoping process, as well as through additional analysis during preparation of the EA. These alternatives were rejected because they were not considered feasible or would not result in fewer environmental impacts than the proposal. The proposed action is the most consistent with the concept identified in the GMPA and best balances competing needs and uses.

ENVIRONMENTAL EFFECTS

Following is a summary which briefly presents the reasons why the proposed action will not have a significant impact on the human environment. A more detailed analysis supporting this conclusion is included in the EA and Staff Report.

Environmental effects of the alternatives were evaluated in the EA, including impacts on land use, recreation, cultural resources, geomorphology and soil, water resources, biological resources, transportation, air quality, noise, human health, safety and the environment, scenic resources and cumulative impacts. Analysis in the EA determined that there would not be significant impacts to land use because the proposed action is consistent with relevant plans and policies, and the change in availability of the helipad is less than significant because other options exist to accommodate the relatively small existing routine medical emergency use. Impacts to recreation were determined to be minor and temporary inconveniences or improvements over existing conditions. Changes to the configuration of the shoreline through removal of rubble and construction of a tidal marsh channel were found not to have significant impacts. Biological impacts were found to be less than significant because of the improvement over existing conditions, the design elements to avoid conflict, and the replacement of disturbed or lost natural habitats. No special status species would be affected. Transportation impacts, including cumulative traffic impacts and changes in parking were found to be less than significant because adequate parking, consistent with the GMPA, is provided, and because of mitigation incorporated into the proposal and in the GMPA EIS to reduce traffic and manage parking. Impacts to human health, safety and the environment as a result of implementation of the plan will not be significant because NPS will coordinate plan implementation with the Army's environmental remediation, and other mitigation measures are incorporated into the proposed action.

Implementation of the Crissy Field Plan would not result in significant adverse impacts on the environment, because the project design avoids impacts and the plan incorporates mitigation measures for potential adverse impacts.

In addition to mitigation incorporated into the proposed action and identified in the EA, the GMPA EIS identified a number of mitigation measures that are relevant to the Crissy Field plan. To address traffic and transportation systems, NPS committed to ongoing monitoring of traffic and travel modes, development and implementation of a comprehensive travel demand management program to reduce traffic growth, pursuing improvements to transit service, and development and implementation of a parking management program. These mitigation measures are underway. The GMPA EIS also incorporated mitigation to protect archeological resources, reduce construction impacts including noise and air quality and protect biological resources.

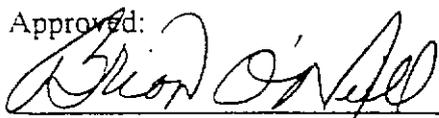
FINDING

In response to comments received during the public review period, as well as public input received at the September 18 GGNRA Advisory Commission meeting, NPS has further considered the range of alternatives, the significance of the potential impacts that may be generated by the proposed action, and the possible need to prepare a supplemental site specific environmental impact statement (SEIS) for the implementation of the Crissy Field Plan. Based on this detailed review, as reflected in the September, 1996 Staff Report and the June, 1996 EA, NPS concludes that appropriate alternatives to the proposed plan have been analyzed, and that the proposal will not generate any significant new or different environmental impacts requiring preparation of an SEIS.

The proposed Crissy Field Plan does not constitute an action which would normally require the preparation of an Environmental Impact Statement. It is tiered off of and is consistent with the GMPA/FEIS, which previously analyzed and provided mitigation for impacts on traffic and transportation systems, the National Historic Landmark District, archeology, air quality, noise, and human health, safety and the environment.

The proposal will not have a significant impact on the human environment. There are no significant unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites listed on the National Register of Historic Places or other unique characteristics of the region. Implementation of the action will not violate any federal, state or local law. Therefore, in compliance with the National Environmental Policy Act, an Environmental Impact Statement will not be prepared.

Approved:

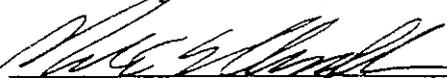


2 October 1996

Brian O'Neill

Date

General Superintendent, Golden Gate National Recreation Area

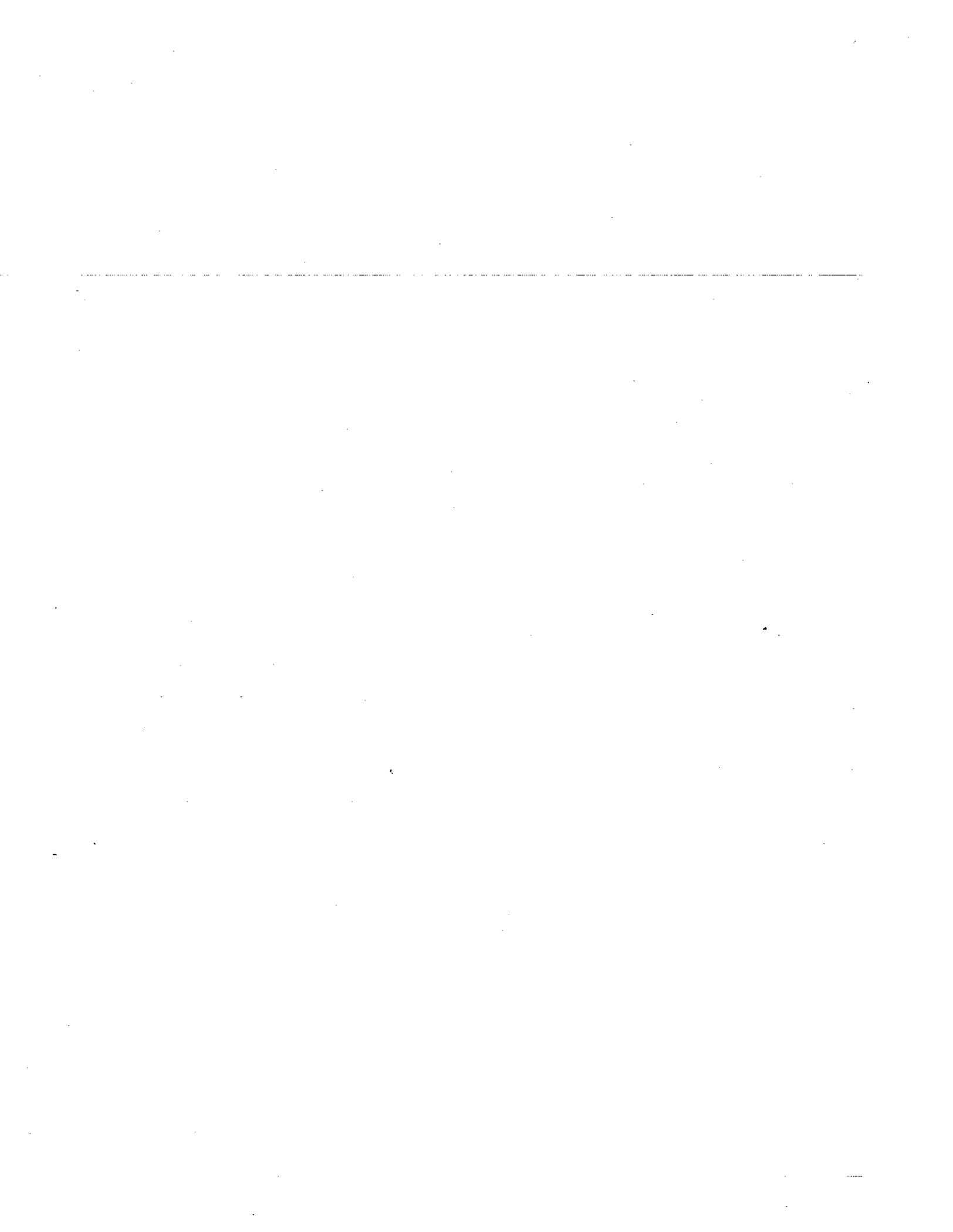


10/2/96

Robert Chandler

Date

General Manager, Presidio Project



**CRISSY FIELD FONSI
IMPACT/MITIGATION MATRIX**

This Impact/Mitigation Matrix includes impacts identified in the Crissy Field Environmental Assessment that require mitigation. It does not repeat mitigation already identified in the General Management Plan Amendment/Environmental Impact Statement.

Land Use Impacts

Phase out of helipad use for emergencies not related to the operation of the park.

The NPS will work with the City of San Francisco to identify other options to accommodate emergencies not related to the operation of the park. NPS will continue to consult and work collaboratively with the S.F. Planning Department, Emergency Management Services Agency, the Office of Emergency Services and other emergency response organizations to assist them in their efforts to effect a smooth transition from the routine use of Crissy Field as a helipad.

Recreation Impacts

Impacts associated with off-leash dog use.

NPS will work with the SPCA and dog walker representatives to begin an active education program as soon as possible.

NPS will enforce voice control and clean up requirements, and will monitor the results of these efforts. This information will be periodically re-evaluated and management adjustments made where necessary, bringing any proposed changes in off leash dog access to the Advisory Commission.

Impacts to Cultural Resources

Potential to affect unknown archeological resources and cultural resources sites.

Documentary research and test excavations will be conducted in the location of the historic Quartermaster wharves and prehistoric site CA-SAR-6 to assist in identifying and avoiding significant remains at these sites during project implementation. NPS will implement the archeological monitoring program designed in accordance with the 1994 Programmatic Agreement. In the event of discovery of either prehistoric sites or burials, consultation would be initiated immediately with appropriate Native American groups in accordance with the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act.

Construction activities in the vicinity of the Old Mason Street railroad tracks.

The location of the buried tracks is known; they will be avoided during construction. The tracks will be covered with asphalt or soil to protect them from future disturbance.

Geomorphology and Soils

Potential for siltation and closure of the tidal marsh inlet channel.

NPS will monitor conditions and periodically mechanically excavate accumulated sand, if necessary.

If future maintenance frequency of the marsh channel becomes problematic, NPS will address construction of a culverted channel in a separate environmental document which evaluates other alternatives including expansion of the marsh or allowing it to become intermittently tidal.

**Geomorphology and Soils
(continued)**

Potential changes in shoreline configuration resulting from removal and reconfiguration of bayshore rubble and construction of tidal marsh inlet channel.

Rubble will be retained or replaced with engineered structures where needed for shore protection. The existing outfall at the East Beach will be replaced with a groin structure to protect the beach.

Water Resources

Potential exposure of aquatic organisms in the tidal marsh to hazardous substances in shallow groundwater.

If the tidal marsh were to be closed for longer than several days, the NPS would monitor conditions and, if necessary, perform mechanical maintenance to open the channel to ensure adequate tidal flushing and dilution of remaining contamination to negligible concentrations.

Cleanup of contaminated areas at Crissy field is the obligation of the Army. The Army will monitor contaminant levels in the project area. If levels are found to exceed risk criteria, the Army will identify and implement appropriate corrective measures, such as constructing subsurface barriers, impermeable soil caps, or interceptor drains.

(See mitigation under Human Health, Safety and the Environment).

Potential short-term water quality impacts associated with construction activities.

The NPS will comply with the conditions of the National Pollution Discharge Elimination System (NPDES) general construction activity stormwater permits, including implementing erosion control plans and stormwater pollution prevention plans. Routine monitoring and reporting of BMP performance will be conducted by NPS pursuant to the NPDES permits.

Biological Resource Impacts
Potential land use conflict between intense visitor use areas and natural habitat of the created marsh within the proposed site plan area.

The design incorporates features (barrier fencing, dense vegetation, location of boardwalks, self-closing gates, etc.) that will reduce potential user/value conflicts.

Loss of 2.6 acres of foredunes.

Native plants will be salvaged where feasible and native dune communities will be restored.

Removal of non-native trees and shrubs.

Palm trees will be relocated to other Presidio or offsite locations. Other tree species will be planted during implementation of the project. Tree removal will avoid bird nesting season.

Transportation Impacts
Potential addition of traffic to the roadway system as a result of visitor trips and construction-related trips.

The expected increase in visitor trips to the project site is within the traffic projections analyzed in the Presidio GMPA\EIS. The design incorporates traffic calming features including narrower lanes and curves on Mason Street.

Monitoring of cut through traffic on Mason Street will continue, to confirm the success of traffic calming features in the proposed design. As a separate action, the NPS will give serious consideration to other measures to further reduce traffic on Mason Street, such as directional changes or closure of Crissy Field Avenue.

Transportation Impacts
(continued)

NPS will continue ongoing monitoring of traffic and travel modes, development and implementation of a comprehensive Travel Demand Management (TDM) program to reduce traffic growth, pursuing improvements to transit service, and development and implementation of a comprehensive parking management program to support TDM and transit objectives while minimizing parking related impacts to the park and its neighbors.

Reduction of total available parking for day-to-day use at Crissy Field north of Mason Street (during and post project construction).

Temporary parking areas will be identified. Construction activities are expected to be sequenced so as not to occur at the same time.

NPS will continue to develop and implement a parking management plan which will include special event parking. Design details, including signage, will be developed to provide for appropriate separation of recreational space and parking at East Beach to assure that the intended parking for 400 vehicles is accommodated. Other appropriate management strategies will be developed as needed.

**Transportation Impacts
(continued)**

Reduction of total available parking space at Crissy Field for special events.

Event sponsors may be required to provide special transit services during their events to reduce expected parking demand and promote the use of public transit and remote parking lots. NPS will continue to develop and implement a Travel Demand Management program and a parking management plan which will include special event parking. Design details, including signage, will be developed to provide for appropriate separation of recreational space and parking at East Beach to assure that the intended parking for 400 vehicles is accommodated.

Air Quality

Increased air pollutant emissions from construction activities.

NPS will require construction contractors to use construction equipment that adheres to stricter emissions standards for No_x or reduce the number of pieces of equipment being operated each day.

Measures will be implemented to reduce fugitive dust emissions including: watering the construction site, use of dust pallatives, and daily covering of areas not undergoing construction activity.

Noise Impacts

Increased noise levels during construction.

Construction operations will comply with the City of San Francisco's Noise Ordinance, which limits day and night time construction noise levels.

Impacts on Human Health,
Safety and the Environment.
Potential exposure of humans
and/or tidal marsh aquatic
life to hazardous substances.

NPS will coordinate timing of implementation with Army remediation efforts. NPS construction activities will follow the Army's remediation activities where necessary.

New information regarding the Army's cleanup program will be evaluated as it becomes available to determine if significant new impacts would result. Additional environmental analysis and public review will be performed, if necessary.

NPS will continue to work with State and Federal regulators and the Army in the detailed design phase of the plan to coordinate plan implementation with cleanup, and to identify any additional modifications/mitigation.

NPS will request the Army to maintain emergency funds and capability to respond to such discoveries.

If necessary, the NPS will require the contractor performing plan implementation to have the capability to handle hazardous waste.

NPS will review the final Remedial Investigation Report in consultation with regulatory agencies to ensure that there are no new impacts that have not been addressed in the Environmental Assessment. Any new impacts will be addressed and mitigated where possible.

Impacts on Human Health,
Safety and the Environment
(continued).

During the design phase, NPS will perform additional independent analyses as needed.

NPS will develop a Contingency Plan to address how hazardous substances encountered during the construction phase will be handled.

NPS will develop a Health and Safety Plan for the project to address worker safety during construction.

Potential for mosquito
generation/rodent problems.

The tidal marsh will include design features to minimize mosquito breeding habitat, to maintain adequate flushing, to prevent stagnation of water, and to maintain a healthy fish population.

NPS will continue to work with mosquito abatement districts during the design phase of the marsh to identify appropriate monitoring and a contingency/response plan to address any future mosquito or rodent issues in the unlikely event that they arise.

Crissy Field Environmental Assessment

Staff Report

Introduction

This Staff Report is an interim step in the National Environmental Policy Act (NEPA) process between the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) or Notice of Intent (NOI) to prepare and Environmental Impact Statement (EIS). Although not a specific NEPA requirement, the Staff Report facilitates the public and Golden Gate National Recreation Area (GGNRA) Advisory Commission involvement in the decision making process, and has often been used by GGNRA when an EA is prepared for a project for which there is strong public interest.

It includes the following:

1. Summary of the public comment, both written comments and verbal testimony from the July 17 Advisory Commission meeting.
2. Identification of issues raised by public comment, where Advisory Commission action is appropriate or which influence the decision regarding whether to adopt the proposed action, and whether to conclude this process with a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an EIS.
3. Discussion of the issues, including response/clarification or recommendation for resolution such as a modification to the design or incorporation of additional mitigation.
4. The staff's recommendation to the decision maker, GGNRA General Superintendent Brian O'Neill, regarding whether an EIS is required, which alternative should be chosen, and modifications to the project which should be added based on public comment.

SUMMARY OF PUBLIC COMMENT

Following is a summary of public comment on the Crissy Field Environmental Assessment (EA,) received during the 45 day public comment period which ended on August 15, 1996, including comments from the July 17 meeting of the GGNRA Advisory Commission as well as written comments. Comments were received from 58 agencies and organizations and 233 individuals. (Note: there is some overlap in comments from individuals, since a few people presented both written and oral comments).

As indicated in this summary, the proposed plan was strongly endorsed by the public, with a majority of the comments indicating overall support for the entire plan or selected plan elements. Concerns were raised on some plan components, particularly related to traffic and parking, the tidal marsh, the width of the bike path, dog walking, and environmental remediation.

General support for proposed action

39 agencies/organizations
198 individuals

Raising concerns on specific plan issues or not stating a preference for an alternative	18 agencies/organizations 22 individuals
Supporting the Dune Alternative	1 organization
Supporting the No Action Alternative	5 individuals
Opposing the tidal marsh	8 individuals

Agencies and Organizations Offering General Support of the Proposed Plan

American Aviation Historical Society
American Institute of Architects
American Society of Landscape Architects
California Alpine Club
California Department of Fish and Game
California Native Plant Society
California Waterfowl Association
Ducks Unlimited, Inc.
Energy Foundation
Environmental Forum of Marin
Exploratorium
Foundation for San Francisco's Architectural Heritage
Golden Gate Audubon Society
Independent Documentary Group
International Urban Estuary Network
KQED Center for Education and Lifelong Learning
League of Women Voters, San Francisco
Marin Audubon Society
Marin Conservation League
Mission Creek Conservancy
Mount Diablo Audubon Society
National Audubon Society
National Parks and Conservation Association
National Trust for Historic Preservation
Presidio Heights Association of Neighbors
Public Trust Group
San Francisco Bay Joint Venture
San Francisco Boardsailing Association
San Francisco Park and Open Space Advisory Committee
San Francisco Planning Department
San Francisco Planning and Urban Research Association
Save San Francisco Bay Association
Sierra Club, Marin and San Francisco chapters and Presidio Task Force
Three Circles Center for Multicultural Environmental Education
U.S. Fish and Wildlife Service (Ecological Services and Wildlife Refuge)
U.S. Windsurfing Association

Agencies and Organizations Supporting the Dune Alternative

Cow Hollow Association

Agencies and Organizations Commenting on Specific Plan Issues/ No Stated Preference for an Alternative

Arc Ecology (environmental remediation)

Bicycle Community Project (widen bike path)

Bicycle Mass-(widen bike path)

California Department of Transportation (traffic)

California Environmental Protection Agency, Department of Toxic Substances Control (environmental remediation)

Council on America's Military Past (oppose wetlands, greater focus on airfield)

Department of the Army, DLI and Presidio of Monterey (airfield restoration/interpretation)

Department of the Army, BRAC Environmental Office (environmental restoration)

Fort Point/Presidio Historical Association (interpretation of airfield history, design of airfield restoration)

Marina Civic Improvement and Property Owners Association (impact of traffic and parking on neighborhood)

Marin/Sonoma Mosquito and Vector Control District (mosquito control)

Marina Neighborhood Association (impacts of off-leash dogs)

Preserve the Marina Campaign (traffic impacts on Marina)

San Francisco Bicycle Coalition (widen bike path)

San Francisco County Transportation Authority (Doyle Drive reconstruction schedule)

St. Francis Yacht Club (parking and sedimentation of yacht harbor)

SF Bureau of Environmental Health Management (mosquitos)

SF Planning Department/Office of Environmental Review (traffic impacts, helipad, GMPA consistency, impacts to SF Yacht Club/harbor and neighborhood)

ISSUES

Issues were identified based on:

1. NEPA relevance: comments addressing the adequacy of the document, range of alternatives, necessity to prepare an EIS.
2. Comments or questions which indicated clarification regarding information in the EA was desirable.
3. Comments which by their frequency indicated a strong public interest or concern.
4. Comments which affect the decision regarding adoption of the proposed action or the substantive policy choice to be made by the National Park Service.

ISSUES RELATED TO THE SCOPE OF THE EA AND THE NEPA PROCESS

Some commenters raised NEPA issues addressing the scope of the EA or the need to prepare an EIS. The specific NEPA issues raised in these comments are addressed below. Other NEPA issues raised in public comments are addressed by topic of concern in the following sections.

1. Improper tiering and need for an EIS.

One individual stated that the EA was improperly tiered from the EIS because the commenter felt that the beneficial impacts of the project were significant and in the commenter's view an EIS should have been prepared. CEQ regulations allow for tiering of environmental documents. A site specific environmental analysis can be

tiered from a broader environmental impact statement such as the GMPA/EIS. Impacts related to the proposed action were identified and discussed, and mitigation identified in the GMPA/EIS. As provided for in the CEQ regulations, this EA was prepared to determine whether a supplemental, site specific EIS is required. No significant new, greater or different impacts have been identified which were not previously addressed in the GMPA/EIS. Accordingly, staff believes that a site specific EIS is not required.

2. Range of alternatives

Several commenters questioned the adequacy of the range of alternatives evaluated in the EA, specifically stating that additional NEPA evaluation was, in their opinion, required or desirable. These comments focused on the following alternatives:

Larger Planning Area. One commenter suggested that the alternative of a plan for the entire 150 acre site was not properly excluded. In section 2.4.1, the EA identified several reasons why this alternative was considered but rejected. NEPA allows the screening of alternatives and in tiering from a broader programmatic document, selection of smaller, site specific alternatives. The entire area was addressed from a NEPA perspective in the GMPA EIS as a conceptual alternative, and the EA confirms the compatibility of this first phase of implementation with full implementation of the concept as in the approved GMPA. The proposed action evaluated in the EA is functionally independent and does not preclude options for later actions in the portion of the site south of Mason Street. This alternative would not have fewer environmental impacts than the alternatives evaluated in the EA.

Freshwater Marsh. An individual commenter suggested that the alternative of a freshwater marsh should be fully discussed. The EA, in 2.4.2 discusses the rationale for excluding a freshwater marsh from further consideration, citing the analysis in the 1995 Feasibility Study which identified several reasons that this alternative was found not to be feasible. This alternative would not have fewer environmental impacts than the alternatives evaluated in the EA, and was properly eliminated from further consideration.

Sever Mason Street. The Sierra Club suggested that the EA should have provided alternatives to eliminate cut through traffic on Mason Street and believed that cut through traffic on Mason Street has significant noise and air quality impacts. Sierra Club Presidio Task Force and 16 individuals suggested closing Mason Street to through traffic west of the commissary.

Cut through traffic on Mason Street is an existing condition and the EA does not suggest any change to Mason Street which would result in new or significant impacts. Impacts of noise and air quality were evaluated in the GMPA/EIS, which includes the retention of Mason Street as a through route. Monitoring of cut through traffic on Mason Street shows that it is not significant. The EA in section 2.4.3 discusses the rationale for rejecting the alternative which would not allow through automobile traffic on Mason Street. This conclusion was based on a traffic impact analysis referenced in the EA which concluded that elimination of through traffic on Mason Street would result in significant impacts to traffic on Lincoln Boulevard. Since this alternative would have greater environmental impact, it was properly eliminated from further consideration. A further clarification of the impacts of this suggestion which resulted in its being rejected is included in the discussion of traffic issues in this staff report.

Close Marina Gate to All Automobile Traffic. Marina Civic Improvement and Property Owners Association (MCIPOA) stated that the EA was not adequate because it did not evaluate an alternative which would close the Marina gate to all automobile traffic. MCIPOA incorrectly states that the Marina gate was historically closed to public automobile traffic. This alternative was not suggested during the scoping process for this EA, or during the GMPA/EIS process. It would not be consistent with the GMPA/EIS and in itself is likely to have impacts which would be significant. MCIPOA further supports the consideration of this alternative in an amended EA or EIS as mitigation for what it feels are unmitigated and unanalyzed cumulative impacts to Marina Boulevard as a small contribution to traffic

including commute and residential traffic (see #3 below). The traffic and parking section of this staff report provides a more specific response to the traffic and parking issues raised by this comment. This alternative would have greater environmental impacts than the alternatives addressed in the EA, and is not considered feasible. Staff recommends against amending the EA or preparing an EIS to further analyze this alternative.

3. Failure to address cumulative traffic impacts/ impacts to Marina neighborhood.

Preserve the Presidio Campaign stated that impacts to the Marina neighborhood were not adequately addressed and that an EIS should be prepared. Marina Civic Improvement and Property Owners Association (MCIPOA) also stated that the EA was inadequate because of its failure to disclose and mitigate cumulative traffic impacts to Marina Boulevard.

The GMPA/EIS included both an analysis of and mitigation for traffic impacts, including cumulative traffic impacts, to neighborhoods outside of the Presidio boundary. The EA incorporates by reference the GMPA/EIS and supporting documents including the Presidio Transportation Planning and Analysis Technical Report. The EA, in section 4.2.12 and 4.3.12 also addresses cumulative impacts. No new significant, greater or different impacts were identified that were not previously addressed in the GMPA/EIS. The specific traffic concerns raised in these comment letters are addressed in the traffic section of this staff report.

4. Consistency with San Francisco Master Plan

Marina Civic Improvement and Property Owners Association (MCIPOA) states that the EA is inadequate because it fails to discuss impacts to the SF Master Plan. Consistency with the SF Master Plan is addressed in the EA at 3.1.3.3. Although not specifically addressed in the EA, consistency with the Transportation Element policy cited by MCIPOA, "to reduce impacts of automobile traffic in and around parks and along shoreline recreation areas", is accomplished through the mitigation included in the GMPA/EIS and in the traffic calming features of the proposed plan such as narrowing traffic lanes and altering the alignment of Mason Street, provision of a separate bike path, as well as through the screening provided in the proposed plan by vegetation and landforms.

5. An EIS should be prepared.

MCIPOA, Preserve the Presidio Campaign and one individual specifically state that, in their opinion, an EIS is required for the Crissy Field Plan. The following reasons were cited by one or more of these commenters:

Commenter felt that significant beneficial impacts would result. There are no new significant beneficial environmental impacts not already addressed in the GMPA/EIS.

Commenter felt that a significant resource (Marina Green) would be impacted by the proposed plan. There are no impacts to Marina Green beyond those disclosed in GMPA/EIS.

In the commenter's view, traffic and parking impacts on Marina Boulevard are controversial. We do not agree that traffic impacts associated with the proposed plan are controversial, or that there are significant new impacts not previously addressed in the GMPA/EIS.

Commenter felt that a precedential decision is involved. We do not agree with the commenter that the proposed plan sets a precedent regarding future decisions related to the Marina/Mason/Lyon/Doyle Drive intersection, Doyle Drive reconstruction or other traffic patterns, beyond the precedent already set in the decisions in the GMPA and already evaluated in the EIS. In defining the planning area from Mason Street north, NPS has retained flexibility regarding future decisions for this area.

An EIS is required to address cumulative traffic impacts to Marina Boulevard and include mitigation. This is addressed above and in the traffic/parking section of Staff Report.

6. The NEPA Process was flawed:

MCIPOA stated that the NEPA process was flawed because a 1995 planning schedule indicated that the process would conclude with a FONSI. The comment acknowledged that the EA clearly states that the process could conclude either with a FONSI or a Notice of Intent to prepare and EIS. We feel that the process was not flawed in this regard and that NPS was fully aware that the analysis in the EA could result in a decision to prepare an EIS.

Conclusion: Careful consideration of the NEPA issues raised confirms that they have been adequately addressed in the EA or in the GMPA/FEIS which is incorporated by reference in the EA. The range of alternatives analyzed in detail in the EA properly excludes those suggested by the commenters.

TRAFFIC AND PARKING

Traffic and parking concerns, including confusion regarding information in the EA were expressed by several commenters. Transportation was a major part of the GMPA planning effort and influenced many of the decisions reflected in the final plan.

Analysis of the alternatives in the Crissy Field EA included a confirmation of GMPA/EIS land use assumptions which were the basis for projections of traffic in the years 2000 and 2010, and concluded, as noted in the EA, that traffic associated with the alternatives in the EA were within these projections.

The issues identified by staff, or information requiring clarification include the following:

1. The EA should have evaluated an alternative to eliminate rather than reduce cut through traffic on Mason Street. Many individuals as well as Sierra Club Presidio Task Force (SCPTF), Presidio Heights Association of Neighbors and National Parks and Conservation Association (NPCA) noted concerns about cut through traffic (traffic on Mason Street not destined for Crissy Field, but using Crissy Field as an alternative route to other destinations, primarily the Golden Gate Bridge). Many of these commenters suggested ending Mason Street at the commissary and a few suggested closing Crissy Field Avenue to motor vehicles.

Marina Civic Improvement and Property Owners Association (MCIPOA) suggested closing the Marina gate to all automobile traffic, incorrectly stating that the Marina gate has been historically closed to automobile traffic. The Marina gate was a predominantly open gate under military operation, closing only for periods of emergency (war) or for operational needs, including night time closure during some periods.

The EA cites a 1992 through-traffic analysis which indicated that eastbound pass-through traffic is very light, and westbound traffic is also very light except during periods of significant congestion westbound on Doyle Drive. The GMPA commits to periodic monitoring of traffic to assess impacts and benefits of implementing the plan. The GMPA also commits to keeping all existing entrances open, to maintain an equitable distribution of traffic. A 1996 traffic count shows that all Presidio gateways carry some degree of pass-through traffic. The data shows that under normal conditions, 8% of westbound Mason weekday traffic (7% on weekends) passes through the Presidio to the Golden Gate Bridge. Only 2% of eastbound Mason traffic passes through from the bridge to the Mason gateway (weekdays and weekends). Changes to Mason Street proposed in the Crissy Field Plan are designed to slow traffic and discourage its use as a pass-through route, further minimizing its already low percentage of pass-through traffic.

All of the traffic studies and analyses conducted to date for Presidio planning indicate that closure of any park entrance would be undesirable because it would shift significant amounts of traffic onto adjacent entrance routes. For example, closure of the Marina gate would be expected to adversely affect the Gorgas and Lombard entrances, as well as many of the nearby routes to and from the gates, both inside and outside the park boundaries. Traffic models and the accompanying analyses also clearly indicate that closure of any of the major routes within the Presidio will have the undesirable effect of shifting significant traffic loads onto adjacent roadways. As a result,

closure of Mason Street near the commissary, as considered but rejected in the Crissy Field EA, would create adverse impacts to Lincoln Boulevard and several connecting streets and intersections. The traffic impacts analysis for Crissy Field, cited in the EA, clearly indicated that the resulting impacts to Lincoln Boulevard would be very serious, adversely affecting bicycle and pedestrian traffic in addition to auto traffic.

Crissy Field Ave. is outside the scope of the proposed action, however the proposed plan does not preclude modifications, such as those identified in the GMPA to change the direction of traffic flow to further reduce cut through traffic. Monitoring of cut through traffic on Mason Street will continue, to confirm the success of traffic calming features in the proposed design. As a separate action, NPS will give serious consideration to other measures to further reduce traffic on Mason Street, such as directional changes or closure of Crissy Field Avenue.

2. Lyon/Mason/Marina/Doyle Drive intersection safety concerns. Several commenters including St. Francis Yacht Club, NPCA, and several individuals urged a more proactive role on the part of NPS in resolving the issue of safety improvements at this intersection.

Although this intersection lies largely outside of NPS boundaries and authority, and is outside the scope of the proposed action, NPS will take a proactive role in working with the City to identify interim safety improvements which can be implemented pending a more comprehensive, long term design solution. In addition, during the design development, NPS will explore additional safety improvements to Mason Street which can be made as part of this plan.

3. Impact of Crissy Field improvements on Marina Boulevard Traffic. MCIPOA commented that Crissy Field users contribute to significant cumulative traffic impacts on Marina Boulevard traffic and that the plan and EA do not mitigate this impact. Suggested mitigation focused on the closure of the Mason St. gate to automobile traffic.

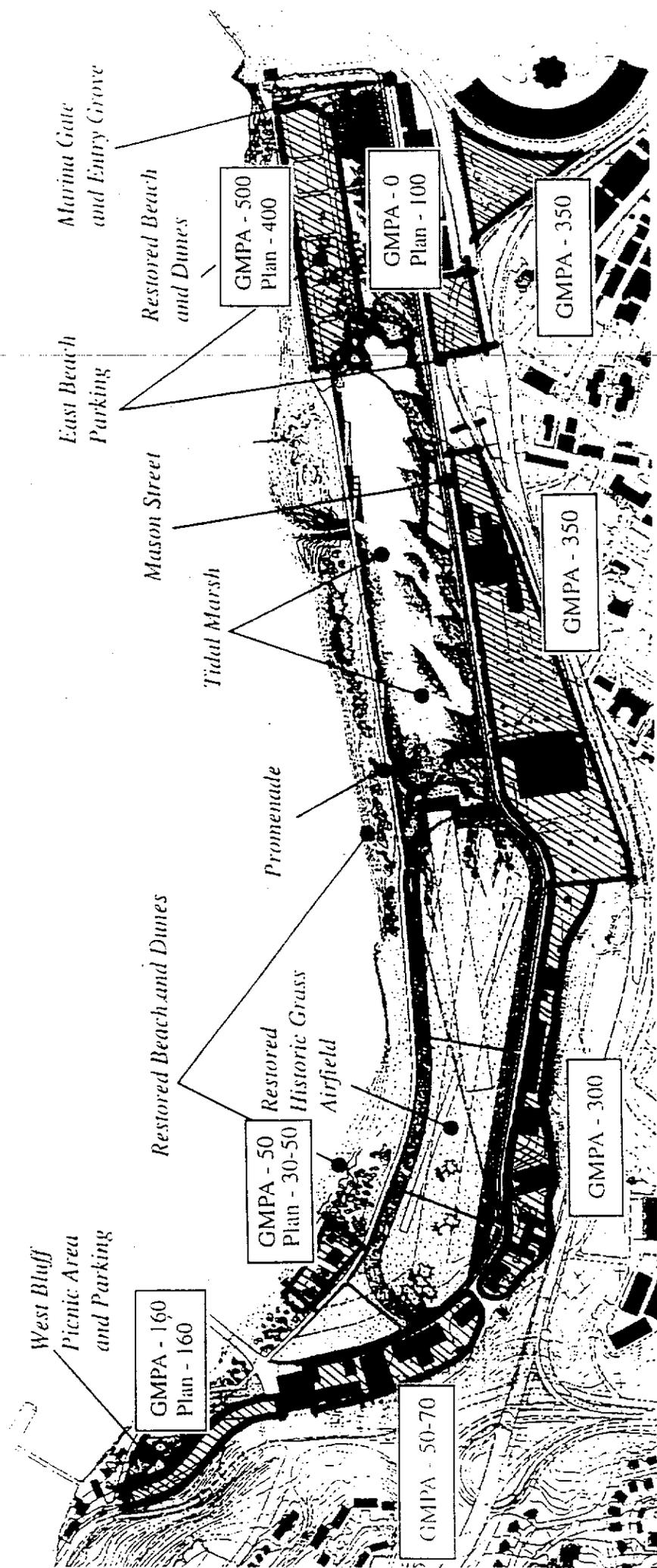
The traffic impacts analysis for the Crissy Field EA specifically compared land use and trip generation potential for the proposed action against that addressed in the Presidio GMPA. The analysis showed that the proposal is generally consistent in these terms, and the traffic which would result from the proposal is consistent with projections in the GMPA. The GMPA addressed cumulative impacts of traffic growth outside the Presidio, and committed to mitigation including ongoing monitoring of traffic and travel modes, development and implementation of a comprehensive Travel Demand Management (TDM) program to reduce traffic growth, a commitment to pursuing improvements to transit service, and development and implementation of a comprehensive parking management program to support TDM and transit objectives while minimizing parking related impacts to the park and its neighbors. All of these mitigation efforts are under way to address Presidio wide traffic growth, projected in the GMPA, with which this plan is consistent.

4. Clarify the parking information in the EA, and how it relates to the GMPA/EIS parking. Discuss location of special event parking and how it will be accommodated. The City of San Francisco Planning Department letter raised these issues. (Figure 1)

Parking provided for in the proposed action is consistent with the parking needs identified in the GMPA. The GMPA calls for 1,760 parking spaces in the entire 150-acre Crissy Field planning area, which includes about 50 acres south of Old Mason Street - outside the scope of the proposed action. The GMPA recommended a distribution of parking spaces throughout Crissy Field in relation to anticipated demand. That allocation called for about 500 spaces at east Crissy Field, about 350 in the vicinity of the Palace of Fine Arts, about 350 spaces near the Commissary south of Mason Street, about 300 spaces south of Old Mason around Stillwell Hall, and about 260 spaces at the west end of the historic airfield extending out to Torpedo Wharf.

The traffic impacts analysis for the Crissy Field EA verified that travel demand, and therefore parking demand for the proposal in the EA was consistent with projections in the GMPA. The Crissy Field plan provides 400 of the 500 recommended east Crissy parking spaces north of Mason Street, and the remaining 100 spaces south

San Francisco Bay



Parking Proposed in Presidio GMPA and Crissy Field Plan

of Mason west of the warehouses. This arrangement will conveniently meet normal demand while minimizing impacts to the area. It will also meet peak demand, with slightly less convenience to the peak-period users, which is consistent with travel demand management strategies that are built into both planning efforts.

The 700 spaces recommended in the GMPA in the vicinity of the Palace of Fine Arts and central Crissy south of Mason Street near the Commissary are outside the EA planning area, and will be addressed in the future in Doyle Drive reconstruction planning efforts. In the meantime, existing parking spaces in these areas will continue to meet projected demand. Similarly, 300 spaces recommended in the GMPA for the area around Stillwell Hall south of Old Mason Street are also outside the EA planning area. Existing parking in this area will also continue to be available throughout Crissy Field development.

Finally, the 260 parking spaces recommended in the GMPA for the area west of the historic airfield to Torpedo Wharf includes some parking to be developed south of Mason among the historic hangars, with the rest to be north of Mason around the Coast Guard Station and farther west at Torpedo Wharf. The Crissy Field EA plan includes continued use of 30 existing parking spaces at the Coast Guard Station, the potential addition of 20 spaces east of the Coast Guard Station in response to public comment (see page 10) and 160 spaces at Torpedo Wharf, which is consistent with parking demand expected at those locations. An additional 50-70 spaces (depending on whether 20 spaces are added adjacent to the Coast Guard Station) will eventually be developed around the hangars outside this planning area. As in the other cases, existing parking in this area will continue to be available throughout Crissy Field development.

The Presidio's GMPA also called for 200 special event overflow parking spaces to be located on the airfield. The Crissy Field EA specifically concludes that use of the restored airfield for overflow parking is not desirable or necessary. This need for event parking can be satisfied through event management and the Presidio's parking management plan, which will require event scheduling and shuttle services sufficient to utilize large parking areas south of Old Mason Street on Crissy Field (350 spaces planned for central Crissy) and those within the main post (1,782 spaces planned) and Letterman (1,554 spaces planned) planning areas, for whatever events generate the need for that overflow parking. Crissy Field parking observations conducted during several special events since the GMPA was completed indicate that the need for spaces beyond the planned 1,760 should be relatively rare, easy to identify in advance, and therefore feasible to address with the parking management plan coordinated through the GGNRA Special Park Uses Group (SPUG) which handles event permitting. Event guidelines regarding size will be determined to assure consistency with the GMPA.

5. A parking management plan is needed to address parking issues including special event parking, accommodating peak recreational demand and managing parking to discourage unnecessary automobile trips and reduce impacts on neighborhoods. This was specifically recommended by the SF Planning Department. The Planning Department, the St. Francis Yacht Club and many individuals also expressed the need to manage the grass parking at the east beach to avoid competition between recreational uses and parking or expressed concerns about whether the design would be able to assure that the unstructured space would accommodate the desired number of vehicles were also expressed.

In the GMPA/EIS, the NPS committed to development and implementation of a parking management program for the Presidio. Implementation of this commitment has already begun, in the form of a study and recommendation report developed for the NPS by a traffic engineering consultant in coordination with park staff and SF Planning Department staff. Continued implementation is under way in the form of incorporation of parking management requirements in Presidio lease agreements, and the development of parking management coordination for permitted events. The NPS will continue to develop and implement a parking management program in accordance with recommendations presented to date and the specific requirements of ongoing planning efforts for Presidio resources.

The generous amount of space allocated for grass parking in the east beach area is more than adequate to accommodate the desired parking as well as associated recreational activities, such as rigging and picnicking.

During the design phase, design details will be developed to provide for appropriate separation of these activities, and provide enough structure to guide parking in a space efficient manner. Staff and the designers will also work with representatives of the San Francisco Boardsailing Association on these and other details of the east beach area. Signage and management will also be important in assuring that this space is used as intended.

6. Have the impacts of not extending Mason Street through traffic through to Fort Point as envisioned in the GMPA been assessed?

Yes, analysis completed for the EA concluded that impacts would not be significant. The transportation analysis for the GMPA/EIS specifically recommends extension of Mason Street through to Marine Drive, directly linking Crissy Field and Fort Point to alleviate traffic pressure on the steep, narrow, and historic Long Avenue. The transportation analysis also includes considerable discussion about the tradeoffs of travel distribution between Long Avenue and the Mason/Marine extension, including the long-term effects of implementing a shuttle system in the Presidio. The discussion indicates that several variations on the recommended access scheme could be implemented, dependent on development of site design details.

The Crissy Field EA includes provisions for a limited-access connection of Mason and Marine Drive through a parking lot near Torpedo Wharf. The access-controlled connection would allow transit, emergency, and some operational travel through the corridor, thereby reducing demand for travel on Long Avenue. The connection also provides direct access to the Torpedo Wharf area, since the parking lots constructed at the end of Mason (east of the access control) are designed to serve both Crissy Field and Torpedo Wharf visitors.

The transportation analysis conducted for the Crissy Field EA also specifically addresses traffic impacts of making or not making the Mason / Marine connection. The analysis concludes that traffic volumes generated by Fort Point and Torpedo Wharf could be accommodated by either route alone, possibly with concentrated impacts at the intersection of Long Avenue and Lincoln Avenue, or at the intersection of Lincoln Avenue and McDowell Avenue. The proposed action distributes traffic among both routes without creating a new route for pass-through traffic of any kind. As a result, concentrated impacts at key intersections will be minimized or eliminated altogether.

7. How to accommodate future parking demand and assure adequate parking during construction.

Currently, Crissy Field, the Letterman complex, and the main post all have excess parking. Construction activities affecting Crissy Field parking areas are expected to be sequenced so that they don't all occur at once. Replacement parking can also be provided in other nearby Presidio lots during construction. In the future, Doyle Drive's reconstruction will need to be achieved in a way that maintains parking supplies and traffic routing throughout construction. This issue is not a function of the actions proposed by NPS here, and will need to be addressed in the Doyle Drive reconstruction project planning.

8. Other comments regarding the amount of parking. Comment on the EA indicated that while there is general agreement about the amount and location of parking, there is still some concern on the part of the public. Comments included St. Francis Yacht Club's concern about adequate parking capacity and possible spillover onto the lot adjacent to the Club, San Francisco Boardsailing Association's request for additional parking east of the Coast Guard Station to accommodate boardsailing launching as well as an individual's request to eliminate the 160 car West Bluff parking lot and the SF Bicycle Coalition preference for fewer parking spaces.

The number of parking spaces included in the GMPA represents a balancing of competing needs of various groups, transit goals, preservation of open space and other considerations. The planned parking supply is designed to match expected demand both now and in the future, transitioning to lower demand rates as transit use and travel demand management programs become increasingly effective, consistent with the GMPA. Demand rates are calculated for planned land uses based on available and planned facilities and observed patterns of usage for non-building-related activities. Presidio parking areas are distributed to provide slight surpluses along boundaries (to minimize impacts to neighbors), and slight shortages in the interior of the park. Locations are selected to accommodate planned activity centers.

All development and activities planned for Crissy Field in the EA are consistent with the GMPA. Because of the timing of the Crissy Field development compared to Doyle Drive, additional parking spaces identified in the Doyle Drive corridor will remain available throughout the first few years of Crissy Field usage, and can be adjusted to provide additional capacity or reduced to provide additional non-auto incentives as justified by performance of the system at that time. Mitigating measures identified in the Presidio's GMPA/EIS specifically call for ongoing monitoring of and adjustments to parking supplies throughout the Presidio. As with parking anywhere in the park, the Crissy Field parking facilities are an integral component of the Presidio's parking system, and will be actively coordinated through a park-wide parking management program in response to current and planned parking demand and supply data. Based on the number of parking spaces provided and additional mitigation identified in the GMPA, NPS doesn't believe that there will be spillover onto the lot near the St. Francis Yacht Club.

In response to the suggestion that approximately 20 spaces be added immediately east of the Coast Guard Station, staff recommends that this small adjustment be made, subject to confirmation that it can be incorporated in a way that minimizes its intrusion on the waterfront, is compatible with the Coast Guard Station site and will not adversely affect views. This additional parking would provide space for disabled access, recreational users, and will serve the Coast Guard Station.

The West Bluff parking lot is necessary to serve the planned uses of the site and should not be eliminated.

MASON STREET BIKE PATH WIDTH

In response to numerous requests to widen the bike path along Mason Street, staff recommends that a minimum of 12 feet be used in the detailed design. Other design suggestions will be considered in the detailed design.

HELIPAD

The San Francisco Planning Department raised several issues related to the helipad facility and its availability for use not related to the operation of the park. The Planning Department expressed concern with the elimination of ongoing emergency medical transport use of the Crissy Field helipad as well as future use for disaster response, and suggested that the heliport be retained until other options are available. Staff has discussed this issue with the City Planning Department, the Emergency Medical Services Administrator, the Port of San Francisco, and emergency medical transport providers.

The EA states that Crissy Field will remain available for helicopter use in the event of a disaster or other emergency but that the permanent features that currently exist there will be eliminated. This is generally consistent with the GMPA which states that the helipad would be retained for limited and specific uses, that the fencing would be removed, that it would be blended into the airfield, and that the location on the airfield could change. The GMPA did not address the level of use. The EA, in Section 4.2.1.3 states that emergency helicopter landing could be accommodated on the restored airfield. In addition, the EA notes that the restored airfield would be available for other disaster relief functions.

Although the concrete pad and lighting are desirable for a permanent heliport as the City Planning Department asserts, restoration of the historic airfield will require demolition of the existing helipad features. Reconstruction of these as permanent features on the restored historic airfield is not compatible with the restoration or future recreational uses, and temporary lighting and fencing can be utilized in a disaster or other emergency situation. NPS has identified several helispots (emergency landing locations) throughout the park which would be used in emergencies.

NPS does not believe that the impact of relocating this use to other facilities is a significant impact. The current medical emergency transport use of the helipad averages only 12 landings a month. Poor weather at Crissy Field

often makes it undesirable for helicopter use. Other facilities currently exist within the City to accommodate this use, and the travel time difference from the other facilities to area hospitals is not significant.

The city has also indicated its desire to improve access to San Francisco hospitals in cases of medical emergency in order to improve the overall functioning of the city's medical transport capability. We will consult and continue to work collaboratively with SF Planning Department, San Francisco EMS Agency, the Office of Emergency Service and other disaster response organizations to assist them in their efforts to effect a smooth transition from use of Crissy Field as a helipad site for emergency medical services.

AIRFIELD RESTORATION

Several comments were received regarding design details related to the restored airfield. These included suggestions to remove trees, and eliminate various features including the pathways, the racetrack delineation, and to extend the length of the airfield restoration. Comments also were received expressing concern over the loss of historic resources from a later period, the treatment of the airfield edges, and the design elevation.

A minimum number of paths has been proposed to cross the airfield for visitor access and to accommodate the disabled. These will be designed in such a way that they have a minimum visual impact on the airfield but provide important accessible routes connecting nearby structures with the beach and promenade. It is important to understand that on a flat field this vast (28 acres) these paths will be imperceptible unless one is standing immediately adjacent to them.

Photographs from the period of greatest significance show a trace of the racetrack still visible on the airfield -- thus it is historically accurate to restore some trace. The proposal calls for a very subtle representation, such as the use of a slightly different grass or mowing height.

The EA states that the interpretation of the airfield's historic patterns of use shown in the proposal are examples, and that the actual restoration details will be developed in the design phase in consultation with park staff specialists, and if necessary, the State Historic Preservation Officer. Pedestrian paths are necessary for disabled access on this large site. The EA states that trees on the airfield which are retained in the plan would not be replaced when they are no longer viable. The EA also states that a programmatic agreement (PA) was developed in 1994 to address the effects of the implementation of the GMPA on historic properties at the Presidio, and that all effects of the proposed action were addressed in the PA, completing compliance with the National Historic Preservation Act.

MARSH

Strong support for marsh restoration was expressed by more than 190 individuals and 46 agencies/organizations commenting specifically in favor of the marsh component of the plan, or in support of the overall proposed action.

Along with the expressions of support were several comments suggesting design modifications and suggestions to reconsider technical assumptions and criteria to improve the functioning of the marsh.

1. Suggested Design Modifications

Marin Audubon Society, Environmental Forum of Marin and several letters from individuals suggested modifications to improve the ecological functioning of the marsh, primarily encouraging reduction in overlooks and relocation of paths or the boardwalk. Other suggestions included relocating the marsh channel to avoid impacts to the existing dunes or expressing concern over the interruption of pedestrian access along the beach by the marsh channel.

The location of the marsh channel as well as the extent and location of access represents a careful balancing of other resource and recreation values, including avoiding a known archeological site. The EA evaluates the impact

of constructing the marsh channel through existing dunes, concluding that it is not a significant impact and will be offset by other dune restoration.

The proposed design incorporates many features to reduce the impact of access on future ecological values such as designing overlooks as blinds, incorporating barrier fencing, self closing gates and a vegetative buffer. It has also eliminated a second boardwalk which was included in an earlier design and relocated the existing boardwalk in response to these concerns. Although staff acknowledges that further reductions in access would improve wildlife habitat values, we do not recommend further changes in the location or extent of access/overlooks at the marsh with the following exceptions. During the detailed design, the location of the overlook adjacent to the south end of the boardwalk will be reconsidered to reduce impacts of visitors, while retaining the intended overlook function and design integrity. Detailed design will also consider the addition of a pedestrian crossing closer to the beach

In response to comments, staff also recommends consideration of moving the western access road to the east beach parking lot as far eastward as is practical and safe to consolidate uninterrupted dune scrub.

Additional changes are not recommended because of the need to balance other requirements. NPS believes that these are design details that do not alter the impact of the proposed action.

2. Size of marsh, future construction of culvert.

Several commenters expressed the opinion that the marsh should be larger for better ecological value or hydrologic functioning, or that the provisions for and commitment to expand the marsh in the future should be strengthened. Comments suggesting that the impacts of a culverted inlet on views and recreational activities would be significant were expressed. Future construction of a culvert is identified as mitigation to improve tidal functioning in the event that frequency of future maintenance becomes problematic. Marin Audubon Society and one individual suggested greater flexibility in response to future evolution of the marsh, allowing it to become intermittently tidal in the event of frequent closures.

The GMPA clearly states that a larger marsh should be restored if feasible. As noted in the EA, design of the marsh in this phase of implementation includes features which would facilitate its future expansion to the area south of Mason Street.

The culvert is recommended as a mitigation feature if needed. Based on analysis in the marsh design, as noted in the EA, maintenance frequency to maintain an open channel is not likely to become an issue in the next 30-50 years. If the marsh is expanded to 30 acres within this timeframe, a culvert would not be necessary. NPS acknowledges that in the future, if it would become necessary, a separate environmental document would be prepared to address visual impacts and alternatives including expansion of the marsh (retaining a natural inlet), and allowing the marsh to become intermittently tidal. Consideration of a culvert does not preclude other future options.

3. Technical Comments: One individual expressed strong support for marsh restoration and offered detailed technical comments regarding selection of a broader range of reference systems to guide the detailed design; recommending reconsideration of information regarding tidal sedimentation patterns and rates and modification of the design and evaluation criteria to reflect a different assumption regarding the relative influence of sand and mud in the evolution of the marsh; suggested modification in location of the tidal channel for greater stability and to reduce the impact of the channel on shoreline configuration; and reduction of the upland buffer and island components of the marsh in favor of greater intertidal habitats.

These technical comments have been carefully reviewed with the commenter and Philip Williams, the design consultant for the marsh, and several of these comments will be further considered in the more detailed design of the marsh. During the design phase of the project, continued refinement of the information regarding sediment input will be used to identify any adjustments in the design needed to reflect new information. Design

modifications which could be made in response to these comments, such as changes in the initial grading of the marsh plain terraces, or reduction in island and buffer habitats, would not have environmental effects in addition to those already disclosed in the environmental assessment, and would not change the basic nature of the marsh as described in that document.

A broad range of reference systems was used in the design of the marsh, including references such as those suggested by the commenter. The predictions of expected tidal sedimentation patterns and rates used in the marsh design was based on several sources including soil corings, dredging records, and direct measurements of sedimentation made at the St. Francis Yacht Harbor. We feel that this is adequate information upon which to base the design. Since the assumptions regarding sediment rates were very conservative, the question of the relative dominance of littoral sand versus mud in the evolution of the marsh would not change the environmental effects of the proposed action as described in the EA.

Rubble which would remain in the beach and dunes would stabilize the location of the entrance channel. Any adjustments of the shoreline configuration in response to the marsh channel would be small in scale and would not affect archeological resources or net littoral transport. In addition, the potential area of impact is limited primarily to between the proposed marsh entrance channel and the stormwater culvert approximately 500 feet to the east and this impact would not be significant. We do not feel that the proposed changes in the location of the marsh channel location are feasible or would result in fewer environmental impacts and do not recommend these changes.

Additional technical review of the more detailed design will be obtained by the NPS in the design phase through assistance from other NPS professional staff, other agency technical staff, peer review or other technical consultants as needed.

4. Opposition to marsh

Although the tidal marsh was strongly supported by the majority of those commenting on the plan, several individuals as well as the Council on America's Military Past continue to express opposition to the tidal marsh. Other commenters, including Cow Hollow Association, Inc. and one individual stated a preference for the dune alternative. Five individuals preferred the no action alternative. Reasons cited included concerns regarding viability, cost, maintenance, compatibility with other recreational uses, and preference for either the existing condition or other values. One commenter stated that a feasibility study, as called for in the GMPA was required.

One letter from an individual enclosed petitions circulated prior to release of the EA. Although there were 3 separate petition texts, over 2700 stated that: "We, the undersigned, oppose the creation of an artificial Crissy Field wetland that would cause conflicts with traditional recreational uses, including off-leash dog walking. We strongly support expanded opportunities for off-leash dog walking at Crissy Field, and consider it essential that this activity be officially preserved, and protected in the design plans for Crissy Field." Over 800 additional signatures were collected on petitions which were silent on the issue of a wetland, addressing only the support of continued opportunities for off leash dog walking at Crissy Field and other sites.

The Crissy Field Plan addresses the concerns raised in these letters. The plan also addresses the concerns raised by the petition. It includes expanded opportunities for off leash dog walking, and the marsh design, as noted in the EA, incorporates features to avoid conflict between other recreational activities, such as off leash dog walking, and wildlife. These comments do not raise issues beyond those already addressed in the EA.

As noted in the EA, a feasibility study and a preliminary design have been completed.

VEGETATION

Several comments were received suggesting correction of species lists, and for use of species to enhance wildlife habitat. Comments from U.S. Fish and Wildlife Service and one individual suggested reconsideration of the

opportunities to restore special status plant species in the project area. California Native Plant Society (CNPS) notes some errors in the list of species which would be used in revegetation, and made recommendations for using commercially available (rather than locally collected) native seed. Other comments suggested changes in the plant species list to either correct errors, or eliminate plants such as poison oak and blackberries, which some reviewers perceived as undesirable.

CNPS recommended removal of the small cypress grove within the dunes.

1. Suggested changes to plant species:

The decision to avoid the introduction of special status species in the restoration was made recognizing the high level of recreational use at Crissy Field anticipated to continue in the future and the concern expressed by many individuals that special status species could cause a change in management of the site that would restrict recreational uses. Although it is still our intention to avoid introductions of special status species that could create future conflicts, or adversely affect these species, there may be opportunities to consider certain plant species in the marsh where protective fencing and barrier vegetation would preclude public access and prevent conflicts. Staff recommends that careful consideration be given to introduction of special status plant species in the marsh, and that this action only be undertaken with the confirmation that future conflicts would not occur.

2. Other vegetation comments: These comments do not suggest changes which would affect the environmental impacts as discussed in the EA. Poison oak will not be used in revegetation. Suggestions to correct the list of species to be used in restoration will be reviewed by staff specialists, and modifications made to the detailed design as necessary. The cypress grove in the dunes will be retained for its recreational and aesthetic value, however these trees will not be replaced when they are no longer viable.

COASTAL PROCESSES/IMPACTS TO ST. FRANCIS YACHT CLUB/ HARBOR AND NEIGHBORHOOD

Both the City Planning Department and St. Francis Yacht Club expressed concern about potential sedimentation of the harbor and St. Francis Yacht Club expressed concern about impacts to the club's breakwater and foundation as a result of rubble removal. The City Planning Department also expressed the concern that windblown sand would impact adjacent neighborhoods.

The EA in 4.2.4.1 addresses the concerns regarding littoral transport of sand, concluding that the removal of rubble would not affect siltation of the yacht harbor because rubble does not currently impede the littoral transport of sand. Removal of rubble and reconfiguring the beach would also not affect the St. Francis Yacht Club breakwater/foundation. As noted in the EA, rubble will be retained or replaced with engineered shore protection where needed for this purpose, including in the area adjacent to the Marina Green seawall.

Wave energy from the northwest is the primary cause of impacts to the seawall which cause deterioration requiring periodic maintenance and repair. Wave energy from the northwest would not be affected by the proposed reconfiguring of the beach.

Windblown sand will be limited primarily to the area of active foredunes, north of the promenade. Because of the distance between the nearest adjacent residences and this area and the large area of stabilized dunes and other landscape treatments which would be used at the east end of the site, windblown sand from Crissy Field after project implementation will not affect adjacent neighbors. Windblown sand will better captured on site by the proposed vegetation.

DOGS

Several commenters including Marina Neighborhood Association, National Parks and Conservation Association, Environmental Forum of Marin, Sierra Club Presidio Task Force and Marin Audubon Society stated one or more

of the following: concern about the impacts of off-leash dogs, enforcement of voice control and dog restrictions, preference for no off-leash dog walking, need for monitoring of impacts of off-leash dog use and a procedure for adjusting areas available for off leash dog use. Fifteen individuals expressed concerns that dog walkers do not clean up after dogs, or that owners do not adequately control their dogs.

The plan provides access to areas where staff felt conflicts would be minimized. Prohibiting dogs in the marsh and the waterbird protection area, and requiring them to be leashed on the Promenade west of the Coast Guard Station and in the West Bluff area provides opportunities for other visitors and protects sensitive resources.

~~To address problems of cleaning up after dogs and appropriate dog behavior in voice control areas, NPS will work with the SPCA and dog walker representatives to begin an active education program as soon as possible. NPS will enforce voice control and clean up requirements, and monitor the results of these efforts. Areas available for off leash dog use will be periodically reevaluated and adjustments made in management if necessary. Proposed changes in off leash dog access will be brought to the attention of the Advisory Commission prior to taking action.~~

ENVIRONMENTAL CLEAN UP

Comments were received from Arc Ecology, Sierra Club Presidio Task Force, and an individual member of the Presidio Restoration Advisory Board (RAB) questioning the adequacy of the ecological risk assessment and existing hazard analysis in the EA and requesting responses to specific questions regarding existing contamination, completion of the Army's Remedial Investigation and Feasibility Study (RI/FS), the Army's cleanup schedule and contingencies for addressing previously unknown contamination which may be discovered during or after remediation. Comments were also received from the U.S. Army identifying recent developments in the restoration program which could affect the proposal and scheduling and funding concerns. The State Department of Toxic Substances Control (DTSC) commented, suggesting minor changes in the EA, and recommending a Health and Safety Plan and a Contingency Plan be prepared. These comments are addressed in detail below.

The Army's cleanup of contaminated sites is a separate project, addressed in separate environmental data collection, analyses and documentation. This cleanup is ongoing and is regulated by DTSC and RWQCB. NPS acknowledges that this process has not concluded, and that cleanup levels and strategies have not been finally approved. The EA relied primarily on information for which analysis had been performed in the Army's studies. With regard to issues involving contamination and remediation, the EA concluded that the project would not significantly impact the environment for the following reasons:

1. An interagency agreement between the Army and the Department of the Interior, known as Subagreement 7 commits the Army to fulfilling its environmental restoration obligations at the Presidio in a manner that is protective of human health and the environment and which meets all applicable legal requirements. Subagreement 7 cites the GMPA as the indicator of future land use in the remedial decision-making process.
2. CERCLA, the National Contingency Plan, and the State Health and Safety Code all require cleanup to levels protective of human health and the environment.
3. As noted in the EA, where necessary, the NPS will not implement elements of this project in areas affected by contamination until the Army has completed its remediation in accordance with Subagreement 7 and applicable laws regarding health, safety and the environment.
4. New information regarding the Army's cleanup program will be evaluated as it becomes available to determine if significant new impacts would result from the proposed action (Crissy Field Plan). Additional environmental analysis and public review would be performed, if necessary.

5. To coordinate plan implementation with clean up, and to identify any additional modifications/mitigations, NPS will continue to work with state and federal regulators and the Army in the detailed design phase of the plan.

Following is a response to the comments received organized by common topics:

Comment: The Army's cleanup at Building 207 (former gas station at Halleck and Mason) may not be in place or completed in time for the plan implementation; other new contamination problems could be encountered during excavation of the wetland site or in other areas such as at the Commissary (old fuel lines), or new underground storage tanks could be discovered.

Response: The recent finding of contamination at 207 will require the Army to investigate and abate contamination at that location in an expeditious manner, working closely with NPS. We believe that the contamination can be quickly remediated if the appropriate methods are used and the needed funding is secured. We also have requested the Army to fast track the investigation, and, if needed, remediation of the possible fuel lines in the Commissary area. No excavation will occur in that area prior to cleanup activities.

We are exploring ways to address the possible discovery of additional tanks or contamination in the course of plan implementation. We will develop a contingency plan to address how any currently unknown hazardous substances that may be encountered during the construction phase will be handled. We will request that the Army maintain emergency funds and capability to respond to such discoveries. If necessary, we will also require the contractor who performs the plan implementation to have hazardous waste handling capability, so NPS can exercise maximum efficiency in developing the site in a timely and cost effective manner.

Comment: Limited funding is available in the Army's overall restoration program; funding shortfalls for sites within or adjacent to Crissy Field may be identified once the cleanup work begins in these areas.

Response: The Army has been in discussions with NPS regarding its funding status. We understand that the Army is in the process of developing a comprehensive budget request for FY-97 through FY-2003 to fully address Crissy Field and other cleanup needs at the Presidio. We have requested that the Army, as part of a strategic plan for cleanup of Crissy Field, identify the needed funding for this work, at the soonest possible opportunity. NPS is working with the Army to prioritize where available monies are best spent consistent with its reuse objectives; however, NPS expects the Army to seek and obtain funding to fulfill its obligations under Subagreement 7.

Comment: Why is there no discussion about the Building 231 contamination area and possible impacts to the wetlands?

Response: Building 231 is mentioned on page 3-39 of the EA. While the Army must address and remediate contamination in this area; we do not expect that it adversely impacts this phase of the Crissy Field reuse plan because contamination from this site has not migrated into the wetland area. Currently, drainage through storm drains is routed to the east of the Building 231 area and does not directly pass through it. However, cleanup of this area needs to be completed prior to restoration of the riparian corridor, a separate project identified in the GMPA.

Comment: Why does the EA reference the Army's draft Remedial Investigation (RI) report, which has not been accepted by the regulators, the RAB or the NPS?

Response: NPS used the Army RI report because it is the most comprehensive available source of information on this topic. When the Final RI is available, we will review it in consultation with the regulatory agencies to ensure that there are no new impacts that have not been addressed in the EA. Any new impacts will be addressed and mitigated where possible. During the plan design phase, NPS will perform additional independent analyses, as needed. In addition to the RI, the EA draws on other available sources of information regarding water quality, such as the Dames and Moore Storm Water Management Plan.

Comment: The EA needs to present more current information regarding the Building 937 site groundwater data and the effectiveness of the UVB treatment system.

Response: We do not expect the presence of groundwater contamination at the 937 site to adversely impact this phase of the Crissy Field plan, except from a design standpoint. This is because the plan does not call for subsurface activities that would encounter groundwater in this area. However, NPS will need to incorporate treatment plant design and location of facilities into its design for this area of Crissy Field. Also, any source removal of contaminated soils required at this site must be performed prior to plan implementation. We refer you to the Army for additional information regarding data for this site and the effectiveness of the treatment system.

Comment: Why is lead contamination from the Golden Gate Bridge not addressed in the EA?

Response: Lead contamination from the Bridge District is not expected to reach this area of Crissy Field. Based on topography and distance, it is unlikely that lead contamination from sandblasting operations traveled east of Torpedo Wharf. The Army has conducted extensive investigations in the area of former Buildings 949, 950, 973, 974, 975, 976, and 979 and is addressing contamination found in these areas, including lead. NPS also conducted tests in 1992 which found low lead levels and no evidence of sandblast paint chips in Crissy Field beach sand.

Comment: The EA only cites one sample taken from El Polin Spring; is this information enough to base the analysis on? Why did the EA not take into account more recent data?

Response: This one sample is not intended to provide an entire analysis; but is rather used to provide historical information. More pertinent are the Dames and Moore 1994 storm drain analyses, which looked at flows of surface water quality from the watershed at various points. The Draft RI report and Marine Ecological Sampling and Analysis Plan have shown concentrations generally consistent with the conclusions in the EA with the exception of new data for copper, which exceeds Aquatic Water Quality Criteria. As with the other metals, it is expected that dilution from tidal exchange will mitigate this contaminant.

Comment: Did members of the NPS environmental team review the EA before it was released for public comment?

Response: Yes.

Comment: The Affected Environment Section 3.5.3.2-3.5.3.3 only addressed drinking water criteria.

Response: See Section 4.2.5.3 where surface water was evaluated against Aquatic Water Quality Criteria.

Comment: Section 3.5.2.2-3.5.3.3 focuses on heavy metal contamination; was a full suite of analyses performed for groundwater contaminants?

Response: Yes, a full suite of analyses was included for groundwater in the Army's sampling program.

Comment: The most recent data sets used are from 1994; the lack of current data compromises the analysis.

Response: For the most part, the data collected in 1994 are from the most recent sampling that was performed for the 2nd Revised Draft RI. Limited additional data has subsequently been collected and will be reported in the Final RI; NPS will review the Final RI against conclusions reached in the EA. The design phase of the plan implementation will use the most recent data and data interpretation, as presented in the final RI report - in particular regarding the ecological risk assessment - to factor in any needed mitigation or design features to address specific contaminants.

Comment: The EA should contain a chart of the contaminated areas showing their significance, cleanup status, cleanup schedule, cost, funding and an estimate of impact to the Plan implementation schedule.

Response: NPS is working closely with the Army, the regulators and the RAB to address the issues of coordination between the cleanup and Plan implementation. We have requested that the Army work closely with NPS and the RAB to develop a strategic cleanup plan for Crissy Field that should result in the kind of analysis suggested in your comment. We acknowledge that the Army's cleanup schedule will affect Plan implementation.

Comment: Have all cleanup levels been set and if not why? Will the Army be responsible for further cleanup once cleanup levels are set?

Response: All cleanup levels have not been set since a RAP/ROD has not been signed for this site. The NPS is working aggressively with the Army and RAB to ensure that cleanup levels are determined. The goal for sites on Crissy Field is to complete cleanup at each site to the appropriate cleanup level, consistent with the reuse plan so that further cleanup is not needed. If needed, the Army (under Subagreement 7 and applicable environmental laws) would be responsible for any additional cleanup where interim actions do not set the final cleanup level.

Comment: What is the timing for the completion of the Remedial Action Plan/Record of Decision?

Response: According to the Army's current schedule, the RAP/ROD is scheduled for the Summer of 1997. We are working with the Army and the RAB to develop alternative, expedited means of reporting and decision making for Crissy Field sites.

Comment: How long is long term for operation and maintenance of cleanup actions, and could cleanup activities delay implementation of the Plan or portions of it?

Response: Long-term refers to operation and maintenance of groundwater treatment plants, which can be 5-30 years. Long-term operation and maintenance of groundwater treatment units should not interfere with NPS' reuse plans, because NPS will work with the Army to incorporate the plant and facility locations into the plan design.

Cleanup activities could delay implementation of the Plan. This could occur if the Army is unable to either fund or perform the cleanup work in the needed timeframe or because the parties do not agree on cleanup methods or cleanup levels. While this delay might have cost impacts for Crissy Field, it is not expected to result in additional or different environmental impacts related to actions proposed by NPS in the Crissy Field Plan.

Comment: Has the Army met all of the deadlines on task orders outlined in the Regional Board's May 1996 Cleanup Order?

Response: Yes.

Comment: When will the proposed individual CAPs be developed to address site-specific cleanups where groundwater contamination occurs?

Response: Development of site specific CAPs for petroleum contaminated sites impacting the Plan area will have to be determined as part of the Army's Crissy Field strategic plan mentioned above.

Comment: What are the sources of contaminants in the Tennessee Hollow watershed and what other watersheds drain into Crissy Field?

Response: Sources of contaminants in the Tennessee Hollow watershed include nonpoint source urban runoff, materials in the storm drain system, several landfills (1, 2 and E), and at the lower end, Buildings on Halleck street where underground tanks and piping or other releases to the environment occurred, such as Building 231,

228 and 207. The only other major watershed that drains into Crissy Field is from the area to the west that drains through the Cavalry Stables area.

Comment: What types of measures are proposed to divert surface and groundwater flows to the Bay once construction begins and would the tidal marsh inlet channel act as a conduit for contamination?

Response: Water generated by dewatering to construct the marsh would be tested to determine whether it would be discharged to the bay or to the sanitary sewer system. As noted in the EA, plan implementation would follow the Army's cleanup of the site. Any remaining contaminants would be sufficiently diluted through tidal exchange to negligible concentrations. A recognized value of wetlands is their ability to trap, break down, or sequester pollutants generated from upstream runoff prior to discharge into receiving waters. As noted above, during the design phase of the project stormwater management practices needed to improve the quality of freshwater and stormwater flow to the marsh will be incorporated as appropriate. EPA standards will be met.

Comment: How effective are the Interim Groundwater activities for Building 637 and when will long-term remediation plans be implemented?

Response: We do not expect the Building 637 site to pose a significant impact on implementation of this phase of the Crissy Field Plan because of its location relative to the proposal. Modeling conducted to date shows that groundwater from this site is not reaching the proposed wetland footprint, nor is it moving in that direction. However, some additional monitoring of the plume needs to be conducted by the Army to confirm this. The Interim Groundwater Remediation activities for this site were simply to skim floating product off of the groundwater table; however, this did not accomplish the goal of long-term remediation. Soil removal actions also occurred which served to remove a significant portion of the source of contaminants from the site. The final implementation schedule for this site has not yet been determined.

Comment: The EA concludes that the risks to aquatic organisms would be low because of substantial seawater exchange; yet the Army's analysis indicates some interaction between groundwater and tides that affects the spread of contaminants.

Response: Substantial exchange of seawater is expected due to the open tidal inlet, as stated in the EA. This comment appears to refer to Army discussions regarding other areas of Crissy Field, such as the 937 site. Tidal mechanisms occurring in wetlands enable the flushing of surface waters; whereas tidal influences on groundwater can, due to changing groundwater levels, create a smear zone of contaminants near the groundwater surface.

Comment: California EPA, Department of Toxic Substances Control (DTSC) commented that the EA should be amended to include lead and TCE in groundwater at the DEH yard, indicate that groundwater monitoring for lead is being conducted at the Fort Point Coast Guard Station and that the terminology in the EA of "ROD" be changed to "RAP."

Response: We appreciate and have noted these corrections. In the planning efforts with the Army to address contamination at the DEH yard, lead and TCE in groundwater will need to be addressed to the satisfaction of the State. These corrections do not affect conclusions of the EA regarding impact significance because implementation of the plan will follow the Army's cleanup for soil and should not impact the ability to conduct long-term groundwater monitoring or remediation.

Comment: DTSC commented that a Health and Safety Plan needs to be developed to ensure worker safety during the construction period; also, a contingency plan needs to be developed to address any hazardous substances encountered during the construction phase.

Response: A Health and Safety Plan as well as a Contingency Plan will be developed for the project.

Comment: DTSC requested deletion of the statement in the EA that the risk of human exposure following remediation is low, since the level of cleanup has not yet been agreed upon.

Response: We acknowledge that a cleanup level has not yet been agreed upon. The premise of this statement was that a cleanup level would be agreed upon that would be protective of human health and the environment, consistent with NPS' reuse plans. Under the terms of Subagreement 7, all cleanups performed by the Army must comply with the California Health and Safety Code, CERCLA and the National Contingency Plan and therefore, must be protective of human health and the environment unless there is a Presidential waiver.

~~Comment: DTSC requested amendment of Section 5.2 to include consultation with the California Department of Toxic Substances Control, the California Department of Transportation, the Golden Gate Bridge District and the California Department of Fish and Game.~~

Response: This section of the EA referred to agencies which had been consulted during preparation of the EA. This section should have included DTSC, California Department of Fish and Game and the Department of Transportation. The Golden Gate Bridge District was not specifically consulted, but did attend the public meeting where the plan was presented and received copies of the environmental assessment.

OTHER COMMENTS

Several commenters suggested changes in the text of the EA including those of an editorial nature, to correct inaccuracies in the document, or to clarify information, with the misunderstanding that the EA was a draft document which would be republished as a final EA. The EA is a final document, which in combination with the Staff Report and FONSI or NOI will complete this phase of the NEPA process. It will not be revised and republished. However, staff have reviewed all of the requested changes. Based on this review, we conclude that the EA as clarified by this report reflects all of the relevant factors to be considered by the decision maker and is adequate to support informed decisions regarding significance of impacts and whether or not an EIS is required.

Comments which address the scope or adequacy of the document or the decision regarding whether to conclude with a FONSI or NOI have been addressed in the Issues discussion above. Other questions and comments request clarification, relate to policy choices among the range of alternatives, preferences of the commenter, or design decisions that do not affect conclusions in the EA regarding environmental impact. Responses to these questions and comments are included in the following section. Editorial suggestions are not responded to in the Staff Report.

DESIGN ISSUES

During public comment a number of design issues were brought up. Some of these issues are already addressed in the plan. Others raise issues to be addressed during the design development phase -- careful consideration will be given to comments made at that time. These issues are organized by area.

East Beach

Comment: Add indoor showers, snack bar, equipment rentals, concession, storage lockers, etc..

Response: The east beach parking area design will include restrooms, outdoor showers, sailboard washing and drying racks, hose bibs, a safety tower, and picnic tables. Amenities such as equipment rentals and a snack bar would have to be provided by a concession or other outside vendor, and as such are beyond the scope of this proposal.

Comment: Provide drop-off area for boardsailors at east beach.

Response: A drop-off area has not been included at the east beach parking area because it was deemed unnecessary in conversations with boardsailors. This issue will be revisited with them during design development.

Comment: Add plexiglas windbreaks at east beach.

Response: The proposal includes a number of vegetated berms or landforms along the west and south edges of the parking area to provide wind protection. No artificial windbreaks will be employed beyond these landforms because of aesthetic or practical considerations.

Comment: Use live oaks rather than cypress in entry grove.

~~**Response:** Monterey cypresses are to be planted in the entry grove as an historical reference to other Presidio gates.~~

Comment: Include a "wave runner" (rescue craft) for boardsailor safety

Response: Special equipment for boardsailor safety is beyond the scope of the proposed action.

Comment: Include rubble removal below the high tide line to improve safety for boardsailors.

Response: Rubble will be removed as much as possible to improve safety of boardsailors.

Marsh

Comment: Provide an overlook of the marsh accessible by automobiles.

Response: Overlooks on the marsh have been designed to minimize their impact on wildlife and maximize their interpretive value. The design carefully minimizes intrusion of automobiles into recreational and natural spaces.

Comment: Soften the edges of marsh.

Response: The ultimate form of the marsh will result from design development. However, it is important to bear in mind that this is a reconstructed tidal marsh in an urban setting, and that other criteria (such as maximizing tidal prism) require some constructed forms.

Comment: Alter location of barrier fencing near the marsh to maximize buffer.

Response: Fencing will be set only a minimum distance into the dune scrub vegetation to mask it from view.

Mason Street

Comment: Use different materials to distinguish between pedestrian and bicycle paths.

Response: The pedestrian and bicycle paths along the south side of the site are being created as a result of restriping and narrowing Mason Street, and thus will be asphalt. Use will be differentiated using signage and other visual cues.

Comment: Make bike path intersection improvements to ensure safety.

Response: During design development, intersection designs will be developed to reduce potential safety conflicts between uses and cars at intersections with entrance roadways to East Beach Parking, at Crissy Field Avenue, and at West Bluff parking area.

Promenade

Comment: Make promenade more curving or wider.

Response: The promenade has been designed to follow the route it currently does, which seems to work efficiently. Given the great volume of users, only the most modest curves would be practical. The final configuration and location of the promenade will be established during the design development phase. The 20 foot proposed width of the promenade is expected to be adequate to comfortably accommodate the intended uses.

Comment: Provide night lighting along the promenade.

Response: During scoping we heard from the public that the present character of the site, including natural light conditions, should remain as it is today. The promenade would be illuminated where it comes near parking areas and roadways. Lighting details will be developed during design development.

Comment: Move the promenade south of marsh to reduce impacts on habitat.

Response: The promenade is located where that activity is located today -- to relocate south of marsh would severely impact recreational use and access. A number of features have been incorporated to minimize the impact of the promenade on the marsh including buffer fencing and barrier plantings.

Other

Comment: Provide night lighting along bike path.

Response: As bike path is parallel to Mason Street it will continue to be illuminated as it is today.

Comment: Include telephones on site.

Response: These will be sited during design development.

Comment: Control rollerblading.

Response: Conflicts between recreational users will be minimized by zoning different users and through signage. Details of this will be worked out during design development.

Comment: Signs should be included for education, enforcement and safety purposes.

Response: A detailed approach to signage will be developed as part of the design development process.

Comment: The 100 car parking lot south of Mason Street should be informal.

Response: This parking area will be developed in an area that is currently paved. Irregular parking in this area will be formalized with striping, curbing or other details to maximize efficiency of use.

Comment: Provide a visitor center at Crissy.

Response: In a separate action, a proposal to rehabilitate an education and stewardship center is proposed for Building 603, south of the planning area, to serve community stewardship activities at Crissy. The Presidio Visitor Center will remain where it is currently located, at the Main Post.

Comment: Include pedestrian links to the Exploratorium.

Response: Detailed design will consider how the paths in the planning area link to pedestrian connections serving the Palace of Fine Arts.

Comment: Restore "Column of Progress" (an automobile roundabout) from PPIE at intersection of Gorgas and Halleck.

Response: This historic feature, although interesting, does not date from the period of greatest significance nor have any remaining historic context. It also involves design outside of the current planning area.

Comment: Provide small boat mast up yard and launch ramp near Coast Guard Station.

Response: The offshore areas between the Coast Guard Pier and Torpedo Wharf will be off-limits to boats and other craft as a waterbird protection area, making this an unsuitable location for a launch ramp. Safety and noise concerns are also considerations.

Comment: Provide dog water fountains.

Response: This will be considered in design development where appropriate.

Comment: Ensure that beach is wheelchair accessible.

Response: As noted in the EA, making the promenade and dunes accessible through trail improvements will dramatically improve the accessibility of the beach. Additionally, beach wheelchairs will be made available for public use to make the sandy beach at Crissy more accessible.

Comment: Allow for future light aircraft landing at the airfield.

Response: Because of safety considerations, compatibility with other values, and FAA restrictions, this capability is not included in the proposed plan.

QUESTIONS AND ANSWERS

Q: How will additional maintenance needs be met?

A: Maintenance requirements of the site were analyzed as part of the overall design process. Several design elements were included to reduce the need for maintenance at the site including: the use of native plants with low water requirements, the use of plant with low pruning or trimming requirements, the use of durable, non-corrosive materials, the use of self-propagating and self-sustaining native plant species, and the development of community-based site restoration and stewardship programs. Implementation of marsh greatly reduces the cost of replacing stormwater outfalls, providing a large cost savings, estimated at several million dollars.

Traditional grounds maintenance activities will focus on about 45 acres of the site concentrating on those areas which are irrigated or are used for recreational activities including the East Beach parking area, the promenade, the airfield and the West Bluff picnic area. National Park Service maintenance personnel will be supplemented with an additional 2-3 full-time workers. Project funding will include funds to supplement initial maintenance activities and longer term funding strategies are under examination as part of the planning process.

The community stewardship program, a key component of the plan, will significantly reduce maintenance costs at the site. This program, which is estimated to cost \$50,000 annually, will involve community volunteers in ongoing planting activities, removal of invasive plants and debris as well as monitoring. An endowment will be established through the Golden Gate National Parks Association to provide ongoing funding for this program.

Implementation of the marsh will eliminate the need for costly replacement of several stormwater outfalls. This cost saving will offset the estimated \$3-5 million cost of stormwater outfall replacement.

Q: When will the stormwater management plan be implemented to improve the quality of stormwater discharged to the Bay?

A: Implementation of the SWMP is ongoing. A key element of the Stormwater Management Plan (SWMP) to improve the quality of stormwater discharged to the bay is the implementation of the Crissy Field wetland. Best Management Practices (BMPs) identified in the SWMP to remove suspended sediment before reaching the marsh, such as biofilters and pretreatment basins, will be considered in the more detailed design phase as appropriate. Individual Presidio projects involving new construction have incorporated BMPs and NPS has implemented a street sweeping program. A spill contingency/response plan for the Presidio has been completed.

Q: Does the Presidio have a general stormwater permit; if so is it in compliance? Repairs to stormwater and sanitary sewers have been implemented on specific sites related to rehabilitation.

A: The State Water Board has implemented the USEPA storm water regulations by requiring industries and construction activities to apply for a statewide general permit, and municipalities with populations greater than 100,000 to apply for individual National Pollution Discharge Elimination System (NPDES) permits. Based upon communications with the State Water Resources Control Board, the Presidio does not require an NPDES permit as a municipality or urbanized area. The preparation of the Storm Water Management Plan complies with the

Regional Water Quality Control Board's request for north bay counties. A stormwater permit would be required for implementation of the Crissy Field Plan since more than 5 acres would be disturbed.

Q: Will high fecal coliform collect in the wetlands? What are the impacts to the wetlands?

A: Fecal coliform is addressed in the EA in section 3.5.3.2 which notes that improvements were made to eliminate cross connections between stormwater and sewer systems, that fecal coliform counts during 1994 stormwater sampling were within the range expected for typical urban storm event runoff, and that recent monitoring has confirmed that the recreational contact standard was not exceeded at the Crissy Field Stations. As noted in the EA in section 4.2.5.3, risk to aquatic organisms from contamination would be low because of the dilution occurring as a result of tidal exchange. In addition, corrective measures and monitoring identified in the Stormwater Management Plan (SWMP), cited in the EA, will further improve the quality of stormwater collected and discharged to the marsh. The SWMP includes wetlands restoration as a recommendation to improve the quality of stormwater discharged to the bay and reduce costs associated with replacement of under capacity and poor condition piping and outfall systems.

Q: Why is a portion of the beach to be made part of the waterbird protection area?
Clarify the extent of the waterbird protection area.

A: The GMPA, which is referenced in the EA, states that "waterbird habitat will be protected in a designated portion of the waters between the Fort Point and Coast Guard Piers and in any restored wetland areas." This area was intended to protect waterbirds, such as grebes, diving ducks, cormorants) as well as shorebirds which utilize the beach and water's edge. The EA notes that watercraft would be restricted from the water between the Fort Point and Coast Guard Piers, and that dogs would be prohibited from the adjacent beach, as well as the beach extending for 500 feet to the east. This section of beach is presently the best shorebird habitat at Crissy Field, and the restriction of dogs from this portion of beach will protect this habitat value.

Q: How will the design and management of the marsh avoid creating habitat for mosquitos and rodents?

A: During and subsequent to preparation of the plan and EA, NPS has consulted with mosquito abatement and vector control agencies in Marin/Sonoma, Alameda, Contra Costa and San Mateo Counties. The design has incorporated measures to avoid mosquito production or rodent habitat. Long term monitoring of the established marsh will be used to identify and implement needed drainage adjustments. Removal of rubble on the beach reduces potential rodent habitat. Ongoing litter removal will eliminate rodent food sources. NPS will continue to work with mosquito abatement districts during the design phase to identify appropriate monitoring and a contingency/response plan to address any future mosquito or rodent issues that may arise.

Q: Was the State of California Department of Fish and Game "Rare Find" data base list was used to verify all of the species listed in enclosure A?

A: This list was not specifically consulted, although NPS contributes to information included in this list. NPS consulted with US Fish and Wildlife Service as required by the Endangered Species Act.

Q: How will interpretation of natural and cultural resources be done, how will we involve the community in plan implementation, how will NPS involve non-traditional users?

A: In a separate process paralleling the site design for Crissy Field, park staff and GGNPA have worked with leading bay area educators and community groups to develop a community education and stewardship program to broaden and diversify public use of Crissy Field. It will build on existing middle and high school programs at the Presidio and Crissy Field, introduce an elementary school component, a mentor program, community outreach program, and stewardship program. An historic building south of the planning area is being considered

as an education facility and community center to support this effort. Other interpretation will use wayside exhibits, self guiding brochures and other traditional NPS interpretive tools.

Q: What efforts have you made to encourage non-automobile transportation to Crissy Field and provide parking for buses. How does this project the proposed future rail connection to the Presidio?

A: The Presidio GMPA outlines an overall strategy to encourage the use of public transportation to reach Crissy Field. The proposed plan for Crissy Field accommodates this overall strategy. Parking for school buses will be accommodated in parking lot design. The GMPA states that NPS will consider the City's future efforts to extend the F-line streetcar to the Presidio, and identified Crissy Field as the most appropriate terminus. Although not included in the proposed action, it would not preclude this future connection.

Q: What will the surface of the promenade be?

A: The EA states that the surface of the promenade will be stabilized aggregate or crushed oyster shell, the exact surface will be determined in the detailed design. This surface will be stable enough to make it accessible but still softer than asphalt or concrete.

Q: What rubble will be buried on the site?

A: Asphalt will be cold-milled and recycled for off-site use. Broken concrete rubble and stone, substances which are inert, will be buried on the site under vegetated landforms located at the south edge of the site. This will keep these materials from having to be sent to a landfill and also provide a stable base for the landforms.

Q: What is the "orientation center" that is proposed for Marina Gate?

A: Neither the GMPA nor the Crissy Field Plan propose an orientation center at the Marina gate. The GMPA states that the Marina gate would be redesigned and would provide orientation. Orientation will consist of appropriate signage or wayfinding panels to provide information to visitors entering the Presidio.

Q: Why aren't parking fees levied on parking close to the beach?

A: The GMPA states that parking fees would be considered for some areas, but in other key sites such as Crissy Field, free parking is desired to avoid impacts of spillover into the neighborhood.

Q: How will the airfield be interpreted?

A: The specific methods to be employed in the design for interpretation of the airfield will include wayside exhibits. Future educational programs or the future relationship to the aviation museum are outside the scope of this design.

COMMENTS SUGGESTING ACTIONS OUTSIDE THE SCOPE OF THIS ACTION

Several comments were received suggesting actions outside the scope of this project including:

- change or eliminate automobile access on Crissy Field Avenue
- address the future use/landscape design at the historic hangar buildings
- include design for the water shuttle dock
- include rail access to the Presidio

waterbird

- extend the bike path to the Golden Gate Bridge
- address the impacts of proposed extension of Anza Street (included in GMPA, not part of this proposal)

Although these suggestions are outside the scope of this project, the proposed plan does not foreclose options to consider them in future planning efforts.

ADDITIONAL COMMITMENTS RECOMMENDED IN THIS REPORT

Recommendations of the Staff Report requiring commitments in addition to those in the EA include:

- 1. Future design briefing:** The next phase of design will provide additional detail and specific design solutions in response to various public comments addressed in the staff report. At an appropriate time in this next phase, the NPS will provide a design briefing and update for the Commission and interested members of the public.
- 2. Detailed design of boardsailing area:** NPS and GGNPA staff and the designers will work with representatives of the San Francisco Boardsailing Association on the detailed design of the parking and rigging areas and other amenities that support boardsailing at this site.
- 3. Intersection improvements at Mason/Marina:** NPS will take a proactive role in exploring with the City interim improvements to the Mason/Marina/Lyon Doyle Drive intersection. Also, in the detailed design phase, NPS will look at improvements to Mason Street that could be made on NPS land at the Marina gate as part of this design, to improve the safety of automobiles, bicyclists and pedestrians.
- 4. Future construction of culverted marsh channel:** If future maintenance frequency of the marsh channel becomes problematic, NPS will address construction of a culverted channel in a separate environmental document which evaluates other alternatives including expansion of the marsh or allowing it to become intermittently tidal.
- 5. Helipad:** NPS will continue to consult and work collaboratively with SF Planning Department, Emergency Management Services Agency, Office of Emergency Service and other emergency response organizations to assist them in their efforts to effect a smooth transition from the routine use of Crissy Field as a helipad site.
- 6. Marsh technical review:** During the design phase of the project, continued refinement of information regarding sediment input and other technical comments will be used to identify any necessary design refinements. Additional technical review will be obtained as appropriate.
- 7. Mosquitos:** NPS will continue to work with mosquito abatement districts during the design phase of the marsh to identify appropriate monitoring and a contingency/response plan to address any future mosquito or rodent issues in the unlikely event that they arise.
- 8. Remediation:**
 - New information regarding the Army's cleanup program will be evaluated as it becomes available to determine if significant new impacts would result. Additional environmental analysis and public review would be performed, if necessary.
 - NPS will continue to work with State and Federal regulators and the Army in the detailed design phase of the plan to coordinate plan implementation with cleanup, and identify any additional modifications/mitigation.
 - NPS will develop a Contingency Plan to address how hazardous substances encountered during the construction phase will be handled; request the Army to maintain emergency funds and

capability to respond to such discoveries; if necessary, will require contractor performing plan implementation to have capability of hazardous waste handling.

- NPS will review final RI in consultation with regulatory agencies to ensure that there are no new impacts that have not been addressed in the EA. Any new impacts will be addressed and mitigated where possible. During the design phase, NPS will perform additional independent analyses as needed.
- NPS will develop a Health and Safety Plan for the project to address worker safety during construction.

9. Dog walking: To address concerns raised by commenters regarding problems of cleaning up after dogs and appropriate dog behavior in voice control areas, NPS will work with the SPCA and dog walker representatives to begin an active education program as soon as possible. NPS will enforce voice control and cleanup requirements, and monitor the results of these efforts. This information will be periodically reevaluated and adjustments in management made where necessary, bringing any proposed changes in off leash dog access to the attention of the Advisory Commission.

10. Parking management: NPS will continue to develop and implement a parking management plan which will include special event parking management. Design details, including signage, will be developed to provide for appropriate separation of recreational space and parking at the east beach to assure that the intended parking for 400 vehicles is always accommodated. Appropriate management strategies will be developed as needed.

11. Mason St. Bike Path: will be widened to a minimum of 12 feet, and appropriate safety features such as striping, signs and separation will be identified in the detailed design.

12. Other design modifications:

During detailed design, the following modifications will be considered:

- Incorporation of a marsh channel pedestrian crossing close to the beach
- Modifications to the design of the overlook on the south side of the marsh to further minimize its intrusion, while retaining its important design and access values.
- Shift the location of the westerly access road to the east beach as far east as is safe and practical.
- Addition of 20 parking spaces immediately east of the Coast Guard Station, upon confirmation that the detailed design is compatible with historic, natural, scenic and recreational values at this site.

13. Cut through traffic on Mason Street: monitoring of cut through traffic on Mason Street will continue, to confirm the success of traffic calming features in the proposed design. As a separate action, NPS will give serious consideration to other measures to further reduce traffic on Mason Street, such as directional changes or closure of Crissy Field Avenue.

CONCLUSION

Staff has carefully reviewed and responded to substantive comments contained in the written and oral comment received during the public review period, as well as answered questions and responded to comments which are not substantive but for which a response is appropriate or relevant to the decision making process.

With the inclusion of the additional commitments identified in the Staff Report, we recommend that the proposed action be approved and a Finding of No Significant Impact be prepared.

