

F O R T B A K E R

Final EIS

2.0 MASTER RESPONSES

There were several issues raised by more than one commentor and/or raised several times by the same commentor. Consistent with the NPS NEPA Guidelines (NPS-12), similar comments have been addressed by one comprehensive response (i.e., a “master response”) to reduce unnecessary repetition. All of the master responses are presented below.

Each master response has been assigned a number. This numbering system is used consistently throughout Chapter 3 to assist the reader in tracking and following NPS responses to comments. A summary of the issues raised is presented as an introduction to each master response, followed by a list of the relevant comments shown in []. For information on the number system and an index of comment letters, refer to Chapter 3.

Master Response #1 – Conzelman Road Closure

Several commentors requested reconsideration of the closure of the segment of Conzelman Road under the Golden Gate Bridge, pointing out its scenic value as well as its ability to provide an alternate route during periods of backup on Alexander Avenue or in emergencies. The Golden Gate Bridge, Highway and Transportation District pointed out that it required access for official vehicles for bridge operation and maintenance. [7-H, 24-A, 38-A, 38-B, 87-A]

Response

The proposed Plan designates Conzelman Road for closure to regular visitor and cut-through car traffic. Under the Plan, service and emergency vehicles would continue to have access on this road. The NPS believes that eliminating regular use of Conzelman Road by vehicles would have important safety and recreational benefits for bicyclists and pedestrians. The inconsistent widths, tight curves, and poor sight distances on the segment of Conzelman Road under the bridge have resulted in a relatively high number of bicycle accidents involving cars, compared to other park roads. (Please note that since January 1998, Conzelman Road was closed Monday through Saturday until 4:00 p.m. to accommodate Golden Gate Bridge seismic retrofit work. At the time this FEIS was being prepared, the GGBHD proposed and implemented 24-hour closure of Conzelman Road from September through July 2000 for the purpose of the bridge retrofit project.)

In response to the comments received on the Draft EIS, the NPS has revised the Final EIS to provide for conditional vehicle access to Conzelman Road. As described in Section 2.6.6 of the Final EIS, Conzelman may be opened to vehicles as a one-way exit during peak traffic conditions. Any use of Conzelman Road for this purpose would require implementation of protective/safety measures for bicyclists and pedestrians.

Master Response #2 – Parking

Several commentors made recommendations related to provision of parking, raised concerns that there would be too much or not enough parking provided under the Proposed Action, and that new parking and/or associated runoff could adversely affect resources. [13-A, 13-C, 14-B, 16-N, 66-D, 116-A]

Response

The analysis of parking requirements and potential traffic impacts associated with the Proposed Action are addressed in Sections 4.2.6.7 and 4.2.6.8 of the EIS. As discussed, the Proposed Action would provide adequate parking for proposed uses. Parking would be located in designated areas to

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serve the proposed uses and facilities without intruding on the resources of Fort Baker. These facilities are well within the capacity of the site, and would be located on previously disturbed sites or existing paved or developed areas. Table 2-1 in the EIS shows the comparison between existing and proposed parking (818/895 spaces). Under the approved General Management Plan (GMP) Alternative and Cultural Center Alternative, more parking would be provided in either the waterfront area or in the parade ground area.

Section 2.6.6 of the EIS described a series of traffic and circulation mitigation measures that have been incorporated into the Proposed Action by the NPS. A fundamental component of the traffic and circulation measures is implementation of a Transportation Demand Management (TDM) program for Fort Baker. The TDM would be focused on reducing individual vehicle trips to Fort Baker, and reducing overall traffic congestion. Section 2.6.6 also includes measures for the management and reduction of traffic and parking effects associated with special events. Section 2.6.10 identifies mitigation that calls for the use of permeable pavement, retention areas, and other site drainage improvements to reduce storm water runoff and improve water quality.

Master Response #3 – Treatment of Waterfront

Several comments questioned the treatment of the waterfront and asked for clarification of habitat values and impacts of recreation in the waterfront area. [14-F, 16-K, 16-L, 16-P, 17-A, 17-C, 17-D, 17-E]

Response

The treatment of the waterfront landscape is described in 2.2.5, Appendix B (plant species list) and Section 4.2.4.5 of the EIS. The waterfront area is intended to accommodate a variety of recreational uses and balance these uses with resource protection (Refer to Section 2.6.4 - mitigation; Section 2.2.5 - beach restoration description; Section 4.2.4.5 - enhancement of beach habitat areas; and 4.2.4.6 - enhancement of eelgrass beds of the EIS for additional detail). The proposed use of native plant materials in this area is intended to provide a public open space that could tolerate informal recreation, using a sustainable plant palette. It was recommended as a more appropriate treatment than the 1980 GMP concept of using an urban landscape treatment such as irrigated and mown lawn (see Section 2.3.5). The proposed use of native grasses and coastal strand species, or other appropriate drought tolerant species, would also reduce maintenance and irrigation requirements. The proposed waterfront restoration is not represented as a native habitat restoration in the EIS, and wildlife use of this area is not expected to be significant.

A band of coastal strand vegetation, similar to that shown in historic photos, is included in the proposed waterfront landscape as a transition between the beach to the grassland/meadow area. The boardwalk would provide an accessible trail surface that would encourage use on a designated surface to limit trampling of the coastal strand area. Dune restoration is not proposed.

Master Response #4 – Battery Cavallo

Several commentors recommended that a plan for the long-term and interim preservation and interpretation of Battery Cavallo be included in the Proposed Action. [15-A, 15-Q, 19-A, 125-H]

Response

NPS natural and cultural resource preservation staff are currently evaluating the condition and issues related to the preservation of the significant resources at Battery Cavallo. The goals are preservation of the battery, protection of the mission blue butterfly habitat, and interpretation and appropriate

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visitor access to the site. In conjunction with public safety and interpretive staff, they are addressing both the interim and long-term preservation and interpretation of the resources. Based on this evaluation, park staff will develop alternative plans to accomplish resource preservation and interpretation. A separate environmental document will be prepared, consultation with appropriate agencies completed, and through a public process a long-term plan will be proposed and implemented. Interim preservation and interpretation steps will also be developed for more immediate implementation.

Master Response #5 – Ferry/Water Shuttle

Commentors urged the inclusion of ferry/water shuttle connection as part of the plan, and some indicated that the cumulative environmental impacts should have been evaluated in this EIS. [15-D, 16-J, 74-A, 125-A, 127-D]

Response

Background

The use of ferry service was originally identified as a potential use at Fort Baker in the *Golden Gate National Recreation Area and Point Reyes National Seashore General Management Plan (GMP)*. Since its inclusion in the 1980 GMP, water transit within the Bay Area region, including potential service at Fort Baker, has become the subject of a larger planning effort. In February 1999, the Bay Area Council and Bay Area Economic Forum published the results of this effort in *Charting the Course: Bay Area Water Transit Initiative - Vision and Conceptual Design*. Three locations within the GGNRA were identified in that document as potential water transit terminals: Fort Baker, Fort Mason, and the Presidio (Crissy Field). The NPS is currently conducting a feasibility analysis specific to the three GGNRA sites. This study will help further define potential opportunities for future service at each site, and will be integrated within the context of other regional planning efforts including the Highway 1 study currently being prepared as a joint effort led by Marin County, the California Department of Transportation, and the NPS.

Proposed Plan and EIS

For the purposes of the Fort Baker Plan and this EIS, implementation of ferry service at Fort Baker was identified as a potential future or cumulative project. As described throughout the EIS, implementation of ferry service at Fort Baker is being analyzed as part of a separate planning process and will be subject to future environmental review under the National Environmental Policy Act (NEPA) and consultation with relevant regulatory agencies including the National Marine Fisheries Service and United States Fish and Wildlife Service. (For additional information on ferry service at Fort Baker, refer to Appendix D: Background Information on Cumulative Projects.)

Several commentors expressed concern that this EIS should consider the impacts of ferry service at Fort Baker. A detailed evaluation of the environmental effects associated with ferry service at Fort Baker is not possible in this EIS due to lack of information about this use. Information such as the proposed frequency of trips, volume of passengers, footprint of landside physical facilities, and associated transit or parking facilities is unknown at this time. In response to the comments raised on this issue, however, a general discussion of these effects has been prepared and incorporated into the cumulative impact analysis in the Final EIS (see Chapter 4).

Master Response #6 – Preference for Docks over Moorings

Commentors stated a general preference for docks over moorings for a variety of reasons including: the ability to attract more boats with docks; safety concerns associated with moorings; reduction in

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shoreline access associated with moorings; and need for docks to accommodate disabled vessels, sailing schools/lessons and other programs. [15-E, 21-A, 26-A, 27-A, 28-A, 30-A, -C, 32-A, 33-A, 34-B, 36-A, 37-A, 41-A, 43-A, 44-A, 50-A, 55-B, 56-B, 57-C, 59-A, 60-B, 62-A, 63-B, 64-A, 66-A, 68-A, 71-C, 73-A, 76-A, 77-B, 78-A, 85-A, 88-A, 89-B, 95-A, 96-A, 98-A, 114-B, 118-A,-B, 119-B, 126-C]

Response

The Proposed Action seeks to make Horseshoe Bay available for use by the boating public, with a maximum number of 60 recreational boats being accommodated at any one time within the Bay. To achieve this, the Plan and Draft EIS proposed a combination of docks and moorings at a 30% to 70% ratio. To encourage and promote the public access and use of the marina, daily/short-term or overnight stays are preferred over long-term dock rentals. Although moorings provide many advantages including lower costs, less visual impact and promoting broad public use/access, the NPS acknowledges the benefits of docks pointed out by commentators. In response to the comments received on the Draft EIS, the Final EIS has been revised to indicate that the ratio of moorings/docks will be determined as function of future detailed design work, and the “70% to 30% ratio” was removed from the EIS (please refer to Section 2.2.3).

The NPS consulted with a marina consultant and engineers familiar with San Francisco Bay conditions, who expressed the opinion that moorings can be safely secured (Moffatt & Nichol, April 1998). The actual layout, spacing and total number of moorings provided will be determined through future design work. Such design will consider maneuverability, turning radii, operations and other safety factors, as well as provisions for planned eelgrass protection and enhancement. All future design work will be done within the overall constraint identified in the EIS of up to 60 boats.

The Proposed Action in both the Draft and Final EIS calls for provision of some dock facilities to accommodate distressed vessels, and to provide staging for public support activities such as temporary off-loading of passengers, sailing lessons, boat rentals and other program-related boating needs. Signage and other educational measures would be provided to inform boaters arriving at Horseshoe Bay of local conditions. Provisions would be made to allow boaters to tie up docks for reasons of physical abilities. The NPS will work with the future operator of the marina and others to consider shore boat or water taxi service to help boaters without a dinghy to go ashore.

Master Response #7 – Preference for Retaining PYC/Travis AFB

Many commenters expressed preference for retaining the Presidio Yacht Club and/or Travis Air Force Base management of the marina and boat shop. [15-J, 26-A, 27-B, 28-C, 31-A, 33-B, 35-A, 39-A, 40-A, 41-A, 42-B, 43-B, 45-A, 46-A, 47-A, 49-B, 51-B, 52-A, 53-A, 54-A, 55-A, 56-A, 57-A, 59-B, 60-C, 61-A, 62-B, 63-B, 65-A, 66-B, 67-A, 68-A, 69-A, 70-A, 71-A, 71-B, 73-A, 75-A, 77-A, 79-A, 80-A, 81-A, 82-A, 83-A, 84-A, 86-A, 88-B, 89-A, 90-A, 91-A, 93-A, 94-A, 95-B, 96-B, 97-A, 100-B, 101-A, 102-A, 102-C, 103-A, 104-A, 105-A, 106-A, 107-A, 108-A, 109-A, 110-A, 111-A, 112-A, 113-A, 114-A, 118-A, 119-A, 125-A, 126-A]

Response

The NPS recognizes the important contribution and role that the Presidio Yacht Club (PYC), under the management of Travis Air Force Base and with the assistance of many members/volunteers, has played at Fort Baker. According to the legislation that established the GGNRA (PL92-589) in 1972, Congress mandated that the lands and resources included in the park be preserved for public use and enjoyment. The legislation specifically stated that when Fort Baker was declared excess to the needs

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of the Department of the Army, that it be transferred to the NPS for purposes of the Act that established the park, including public use. Consistent with this mandate, the goals and objectives of the Proposed Action are focused on preserving Fort Baker's resources and promoting and providing for public access to these resources by current and future generations. (Refer to Section 1.3 of the EIS for additional discussion of the goals and objectives of the project.)

Although the PYC clubhouse and food service is open to the public on a limited basis, its docks are almost entirely reserved for long-term rental by its members, who are limited to active-duty and retired military personnel and other persons associated with the federal government or Coast Guard Auxiliary. As stated in the Draft and Final EIS and proposed Plan, the NPS would continue to work with the PYC and Travis AFB to identify opportunities to provide for the continued involvement of its members. In selecting the future operator of the marina, the NPS would consider proposals from the PYC/Travis AFB which satisfy the Plan's objectives and which do not continue privileged exclusive access. Regardless of the future operator selected to manage the marina, active and retired military personnel including PYC members and volunteers would have full access to enjoy the marina. Such access, however, would have to be on the same basis as other members of the public.

Master Response #8 – Impacts to Current Users of the Boat Shop and Marina

Commentors expressed concern related to the impact on Presidio Yacht Club and its members, and that the EIS should evaluate this impact. [1-A, -B, -C, 49-A, 51-A, 57-B, 62-B, 62-D, 63-A, 69-A, 70-A, 73-A, 77-A, 84-A, 86-A, 96-B, 101-B, 103-B, 117-A, 126-A]

Response

The decision to close Fort Baker as a military installation was made when the 1995 Base Realignment and Closure Act (BRAC) list was passed by Congress and signed by the President. The proposed reuse of the boat shop and marina facilities under NPS management must be done in a manner consistent with the NPS mission and the goals and objectives of the Plan (as described in Section 1.3 of the EIS). The NPS is required to promote and provide public access to National Parks. Consistent with this mandate, the proposed Plan for Fort Baker recommends the conversion of the marina to a facility that is available to the general public, rather than a membership.

The NPS acknowledges the impact to current PYC members, and Section 4.2.11.2 of the EIS addresses this issue and concludes that this would be an adverse impact on PYC members. Section 5.3.1 (Adverse Impacts That Cannot be Avoided) also identifies and describes the impact of converting the existing marina from a private to public facility.

It is important to note that the NPS Plan does not propose the closure of Fort Baker, rather it proposes its reuse as a new unit in the National Park System consistent with the mission and policies of the NPS. As discussed in the Plan and EIS, the NPS will continue to work with the PYC and their military sponsor, Travis Air Force Base, to identify ways for its members to remain involved in the new park operation. The NPS would fully consider proposals from the PYC which satisfy the NPS mission and Plan objectives, and do not continue privileged exclusive access. Also see Master Response #7.

Master Response #9 – Dredging

Several comments identified concerns and/or requests for clarification related to existing and future dredging activities, the disposal of dredged materials, and associated environmental effects. A

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comprehensive response to the substantive issues raised is presented below. [16-A, 16-D, 16-E, 16-F, 16-G, 16-H, 16-R, 16-S, 25-B]

Response

The Proposed Action would not increase the frequency or volume of current dredging practices within Horseshoe Bay. The most recent dredging activities occurred in 1994 when the US Coast Guard removed approximately 15,000 cubic yards (CY) of material. This was conducted primarily to maintain navigability and the entrance channel for the search and rescue operations performed by the Coast Guard. The dredged sediments were disposed of at the US Army Corps of Engineer's designated dredge disposal site near Alcatraz Island, in accordance with existing policy related to the disposal of dredged material within the San Francisco Bay (Corps, 1997a). The current need for dredging associated with the Coast Guard's operation is approximately every 5 to 7 years.

The marina has also required maintenance dredging, although on a much smaller and less frequent basis. Records reflect that this minor dredging activity has been required on a schedule of approximately every 10 years, with the last dredging of 800 CY occurring in 1993. Prior to 1993, approximately 775 CY of material was dredged in 1983. Dredging for marina maintenance has been performed in the area between the main dock and the shore (pers. comm., Duane McQuilliams, Presidio Yacht Club). It should be noted that the bottom of the bay was recently examined by NPS, and it was determined there is no need for dredging at this time in the area of the marina. The discussion of current dredging practices in Section 3.2 of the FEIS has been expanded to incorporate the above information related to existing dredging for marina operation.

Under the Proposed Action, dredging would only be conducted to the extent necessary to allow for Coast Guard operations and for the marina small boat use to continue. The total number of recreational boats accommodated at the marina under the Proposed Action would be reduced slightly (from 70 to 60). Although this represents a reduction, is not anticipated to substantively reduce the frequency or amount of potential dredging activities especially given the minor contribution of the marina to overall dredging needs within Horseshoe Bay.

Consistent with the San Francisco Bay Conservation and Development Commission's (BCDC) findings and policies related to dredging in the Bay, and the Long-Term Management Strategy (LTMS) for the placement of dredged material in the San Francisco Bay Region, future dredged material from Horseshoe Bay would be considered for on-site beneficial reuse as a first priority. If not possible, off-site beneficial reuse would be considered, and finally disposal. If disposal is required, then disposal at non-tidal sites would be used to the maximum extent feasible. The NPS has, and continues to, support beneficial reuse and the establishment of non-tidal disposal sites.

The potential water quality and biological impacts associated with implementation of the Proposed Action, including ongoing dredging operations at Horseshoe Bay, were evaluated in the EIS. Among the impacts discussed were the potential for suspension and redistribution of pollutants in the water column, increases in turbidity, and decreases in dissolved oxygen to occur. Please refer to Sections 4.2.3 and 4.2.4 of the EIS for additional information. In response to the comments received on the Draft EIS, additional analysis of the cumulative effects of dredging and disposal of dredged material was incorporated into the Final EIS.

All dredging activities at Fort Baker would be conducted in accordance with relevant regulatory requirements and consistent with adopted environmental plans and policies including the Long-Term

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Management Strategy (LTMS) program. Section 4.2.3.2 of the FEIS has been expanded to include additional information on these requirements. In addition to the existing regulatory requirements, mitigation presented in Sections 2.6.3 and 2.6.4 of the FEIS have been refined to be more stringent based on input received from the commentors, including the National Marine Fisheries Service (refer to response to comment 3-A for additional information).

The recommendation that the objectives of the Proposed Action be changed from “minimize impacts” to “avoiding adverse impacts” is noted. Avoidance of all environmental impacts, however, is not realistic given the history of the site and the other stated objectives of the plan that include promoting public access consistent with the NPS mission and ensuring compatibility with existing permanent tenants, including the Coast Guard. The Coast Guard is responsible for responding to emergency calls on the Bay and providing search and rescue activities over a large area of the coast, requiring maintenance of a clear channel to ensure public safety. The mitigation measures presented throughout Section 2.6 have been incorporated into the Proposed Action to reduce or avoid impacts to the greatest degree feasible.